



MODERN SLAVERY ACT TRANSPARENCY STATEMENT FOR FINANCIAL YEAR 2018

This statement is made on behalf of Golder Associates Corporation, and all its subsidiaries and affiliated companies (hereinafter “Golder”) for the 2018 financial year. In accordance with Section 54, Part 6 of the UK Modern Slavery Act 2015 this statement sets out the measures we have taken to prevent slavery and human trafficking in our supply chains and in our business.

Golder is an employee-owned, global organization providing consulting, design, and construction services in our specialist areas through technical excellence, innovative solutions and award-winning client service.

We are committed to high standards of ethical behaviour in the conduct of our business. We believe it is an indisputable truth that all people are entitled to be treated with dignity and respect. Modern slavery, in any form, is unacceptable. Golder does not and will not tolerate any association with modern slavery or human trafficking in any form.

Our written Code of Conduct [available at: <https://www.golder.com/about-us/corporate-responsibility/>] affirms that we are committed to:

- having integrity in our business by operating in an honest, reliable, ethical and trustworthy manner in both our relationships and work; and
- respecting and caring about our people, clients, and the communities and environments in which we live and work.

Our Code of Conduct also clearly expresses our expectation that our suppliers behave in a manner consistent with our Code of Conduct and our Health and Safety Policies.

We actively encourage employees to report any situations which they believe do not comply with the Code of Conduct or that are unethical, inappropriate or illegal. Golder maintains an ethics and compliance hotline, through which employees can report compliance concerns securely and confidentially.

In 2018, we took steps to increase the visibility of our ethics and compliance hotline, and we are continuing this effort in 2019. Further, we are planning, via live training, to encourage our global leadership and, by extension all our colleagues, to report any concerns they may have surrounding slavery and human trafficking.

Golder is also a signatory of and committed to the UN Global Compact Ten Principles which seek to ensure that businesses operate in ways that, at a minimum, meet fundamental responsibilities in the areas of human rights, labour, environment and anti-corruption, including the elimination of all forms of forced and compulsory labour and abolition of child labour.

Effective internet and information technology controls help deter human trafficking and forced labour by preventing the use of such resources for anonymous communications and illegal transactions. In 2018 Golder implemented additional security features that help us determine the presence of “The Onion Router” (or “Tor”) type browsers on Golder networks and computers. Unethical parties can use these browsers to remain anonymous online and avoid detection of their activities. Such browsers have routinely been linked to illicit trade. Consequently, Golder prohibits their use and has taken steps to ensure these browsers are not used on Golder’s networks or downloaded to Golder’s computer hardware.

Throughout 2018, we also took steps to strengthen our risk-based third-party due diligence program. The goal of our program is to mitigate bribery and corruption risks associated with our



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engagement of third parties and gain greater visibility into the ethical practices of the third parties with whom we do business. Golder engaged a third-party due diligence provider to help facilitate our due diligence program.

We intend to continue working towards raising awareness of, and further minimizing risks associated with, slavery and human trafficking within our business and supply chains. We will detail these efforts in our next annual statement.

Approved by the Board of Directors

A handwritten signature in black ink, appearing to read "Hisham Mahmoud".

Hisham Mahmoud, PhD, PE
President & CEO
Golder Associates Corporation

September 2019