



**INTEGRITY**

Consistent with Golder’s Anti-Bribery & Corruption Policy, Golder prohibits the improper giving and receiving of gifts, entertainment, and financial contributions. All employees and hired persons and entities must comply with this policy and, as necessary, communicate it to third parties with whom Golder conducts or seeks to conduct business.



**EXCELLENCE**

Golder prohibits all improper giving and receiving of gifts, entertainment and financial contributions:

- Employees shall not give or receive gifts or entertainment when the intention is to persuade anyone to, or reward anyone for, acting improperly or misusing their authority. Accordingly, gifts and entertainment may only be given or received if all of the following conditions are met: the gift/entertainment is: i) reasonable; ii) customary; iii) appropriate in the regions and cultures in which it is both given and received; iv) provided openly and transparently; v) permitted by all applicable laws, rules and regulations including, but not limited to, client policies; vi) in accordance with Golder’s Code of Conduct and Anti-Bribery & Corruption Policy; vii) in accordance with Golder’s Authority & Responsibility Matrix (ARM); and viii) properly documented.



**TEAMWORK**

- Employees shall obtain approval of the Operating Company Region President/Managing Director or their designate before giving or receiving:
  - Gifts valued at more than US\$100 (or local currency equivalent);
  - Entertainment (such as invitations to ordinary sports, theatre and other cultural events) valued at more than US\$250 (or local currency equivalent) per event;
  - Meals in excess of US\$150 per head per night (or local equivalent for a meal of the same standard); or
  - Travel or overnight accommodations.
  - Region Presidents, in coordination with Region General Counsel, shall establish, and locally publish, geography-specific amounts, as necessary, for each of the limits set forth above. Such amounts shall not exceed the US currency amounts established by this policy.



**CARING**



**OWNERSHIP**

- Employees shall not, under any circumstances, make political contributions of any kind on behalf of Golder or in Golder’s name.
- Contributions made to community projects or charities shall be made in good faith and in compliance with Golder’s Code of Conduct, Anti-Bribery & Corruption Policy, Authority & Responsibility Matrix and Corporate Social Responsibility guidance. Contributions and sponsorships should never be “compelled” or required as a condition to doing business.
- All employees and hired persons and entities are required to adhere to this policy and the associated Guidance Document. If you need assistance, or are in

doubt as to whether specific conduct may constitute a breach of this policy, please contact your Region General Counsel.

- Protecting Golder's values and reputation is every employee's responsibility. If you become concerned about or aware of any potential non-compliance with this policy please contact Golder's Ethics and Compliance hotline at <http://www.golder.com/coc>.
- An employee's violation of this policy will result in disciplinary action, which may include termination and/or notice to appropriate enforcement agencies. A third party's violation of this policy may lead to the suspension or termination of any or all agreements and/or notice to appropriate enforcement agencies.



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