



**INTEGRITY**



**CARING**



**INCLUSION**



**EXCELLENCE**



**TEAMWORK**



**OWNERSHIP**

Golder is committed to complying with all anti-bribery and corruption laws in the countries in which it does or intends to do business. Under this Anti-Bribery & Corruption Policy, Golder prohibits corrupt payments and other improper conduct. All employees, directors, officers, and third parties are required to comply with this Policy and are expected to monitor business activities to ensure continued compliance with the Policy when promoting or conducting Golder business.

### We prohibit bribery and corruption:

- Under no circumstances shall an officer, director or employee, or any third party working on Golder's behalf, give, offer, or promise anything of value to a government official or any other individual or entity, including those in the private sector, with the intent to obtain or retain any business or other advantage.
- 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.
- Employees are NOT authorized to make "facilitation" (or expediting) payments to expedite or secure the performance of routine, non-discretionary functions or routine government actions. Employees may only pay official service fees that are publicly posted on fee schedules and for which payment is properly documented. Payments made in emergency situations where there is a threat to an employee's life, limb, or liberty do not violate this Policy, but should be properly reported and recorded in Golder's books and records.
- Employees shall not improperly give gifts, meals, entertainment, travel or contributions to persuade anyone to, or reward anyone for, acting improperly or misusing their authority. This Policy applies even when personal funds are used and no reimbursement from Golder is sought. Consult the Golder [Gifts, Meals, Entertainment, Travel and Contributions Policy](#) and related Procedure for more details.
- Golder does business only with reputable third parties who share Golder's commitment to anti-bribery/corruption compliance. When considering whether to retain a third party, Golder must conduct thorough due diligence to understand the third party's true identity, ownership, control, relationship (if any) with government officials and reputation with regard to improper activities. This diligence must be completed prior to Golder entering into any binding commitments with the third party. Consult Golder's Third Party Due Diligence Policy and Procedure for more details.
- Unless exempted, all employees shall participate in annual training concerning this Policy and shall annually confirm their understanding of the Policy and the consequences of non-compliance.

- Golder recognizes that business practices vary regionally and culturally. What is considered unacceptable in one region may be normal or usual practice in another. Nevertheless, Golder expects its employees and third parties to adhere to this Policy and the associated Procedure at all times. If you need immediate assistance or are in doubt as to whether conduct may constitute a breach of this Policy, please contact your Region General Counsel.
- If you become aware of or are concerned about any potential non-compliance with this Policy, please contact the Golder Ethics and Compliance hotline at: <https://golder.alertline.com/gcs/welcome>. Employees who ask a question, raise a concern, make a report or participate in an investigation in “good faith” will be protected from retaliatory actions and discrimination. Acting in “good faith” means that you sincerely believe that there is an issue or concern with questionable, unethical or illegal behavior and are not deliberately making a false report. It does not matter whether your report uncovers illegal or unethical behavior, only that you came forward with honest intentions. Deliberately making a false report can result in disciplinary and/or legal action.



**Hisham Mahmoud, PhD, PE**

Principal

Global President & CEO

Golder Associates Corporation

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