



INTEGRITY

Golder prohibits the improper giving and receiving of gifts, meals, entertainment, travel, and contributions (“Benefits”). Golder directors, officers, employees and all other persons and entities doing business on Golder’s behalf must comply with this Policy and with Golder’s Gifts, Meals, Entertainment, Travel & Contributions Procedure (the “Procedure”). This Policy applies to all Benefits given or received by Golder (and any person or entity acting on Golder’s behalf) and all parties with whom Golder does business (e.g., clients, subconsultants, suppliers, agents, etc.).



EXCELLENCE

- Golder employees shall not give Benefits to persuade anyone to, or reward anyone for, acting improperly or misusing their authority. This Policy applies regardless of whether personal funds are used; regardless of whether reimbursement is requested; and anytime a perception could be created that Benefits are being given by or for Golder’s improper advantage. Further, all Benefits must comply with Golder’s [Code of Conduct, Anti-Bribery and Corruption Policy](#), and the applicable [Authority and Responsibility Matrix](#) (“ARM”).



TEAMWORK

- Government Officials: Various laws and regulations govern the giving of Benefits to Government Officials. Violation of such laws and regulations may expose Golder and its employees to criminal and civil penalties. Therefore, all Benefits given to, on behalf of, at the request of, or associated with Government Officials or the family or household members of Government Officials – *regardless of the value of the item given* – must be pre-approved in accordance with the applicable Region ARM. Provided however, such Benefits may never be given as a condition of doing business. For guidance on who may be considered a “Government Official,” please consult the Procedure.



CARING



OWNERSHIP

- All political contributions by or on behalf of Golder, if any, must be pre-approved in accordance with the ARM. Such pre-approval is required regardless of whether such contributions are made with personal or corporate funds and regardless of whether reimbursement is to be requested.
- The Operating Company Region President (or designee) must pre-approve the giving or receiving of Benefits that exceed the Country-specific amounts set forth in Addendum 1 to the Procedure. If the country in which a Benefit is to be given or received does not appear in the Procedure, employees must contact their respective Region General Counsel (or designee) for guidance prior to seeking approval from their Operating Company Region President (or designee).
- The Procedure provides further guidance on the appropriate giving, receiving and documenting of Benefits. All Benefits given or received must be supported by appropriate documentation and properly recorded in Golder’s Benefits Registry.
- Please contact your Region General Counsel (or designee) or Golder’s Senior Legal Counsel for Compliance if you need assistance or are in doubt as to whether any particular conduct may constitute a breach of this Policy.

GIFTS, MEALS, ENTERTAINMENT, TRAVEL & CONTRIBUTIONS POLICY

RL3, FINAL

- 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.
- Protecting Golder's values and reputation is every employee's responsibility. 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.



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