

CODE OF CONDUCT

GOLDER IS COMMITTED TO HIGH STANDARDS OF ETHICAL BEHAVIOR IN THE CONDUCT OF ITS BUSINESS.

Our Code, built on and reflective of our values, guides the behaviors of all our employees, at all levels, wherever they conduct business.

OUR VALUES



INTEGRITY

We are honest, reliable, ethical and trustworthy



CARING

We respect and care about each other, our clients, communities and the environment



INCLUSION

We are inclusive and embrace diversity



EXCELLENCE

We pursue excellence in all we do



TEAMWORK

We are a connected community, actively sharing knowledge and experience



OWNERSHIP

We take pride in our work and are invested in our company and its success

Our culture of responsibility to each other and all our stakeholders demonstrates our commitment to living our values every day. Our people behave in a manner that upholds and builds our reputation.

Golder and its employees act in accordance with the following principles of behavior:

CONDUCT TOWARD EMPLOYEES

Golder...

- works to protect the health and safety of all our employees by providing knowledge, tools and support.
- acts and communicates honestly, fairly and respectfully.
- provides a supportive work environment, where employees have the opportunity to reach their fullest potential, where employee diversity is valued, and where employees are free from discrimination and harassment.
- protects the privacy of our employees.
- compensates fairly relative to the local marketplace.

- strives to develop the capabilities of our employees to continuously improve our knowledge base, tools and performance.
- supports teamwork, collaboration, global connectivity, and the sharing of knowledge and experiences.

EMPLOYEES' CONDUCT TOWARD GOLDER

Our employees...

- comply with this Code of Conduct and adhere to established policies and procedures.
- maintain a safe and healthy workplace by following health, safety, security and environmental reporting rules, practices, processes and procedures.
- act in the interests of their colleagues' health and safety.
- individually and collectively keep the workplace free of harassment, intimidation, bias, violence, threatening behavior and unlawful discrimination.
- do not release or share confidential information, intellectual property, knowledge or Golder data without appropriate permission.
- respect the privacy of other employees.
- act in the best interest of Golder and if aware of a Code of Conduct violation or a conflict of interest, real or perceived, report the situation to their direct supervisor or in accordance with the reporting procedures noted below.

CONDUCT WITH CLIENTS AND SUPPLIERS

Golder...

- acts in the interests of our clients' and suppliers' health and safety.
- expects suppliers, agents, consortia members, joint venture participants, and subcontractors working with us to behave in a manner consistent with our Code of Conduct and Health and Safety policies.
- only undertakes project assignments when it has the capability to carry out the work either solely or with others.
- endeavors to avoid conflicts of interest, both as a company and as individuals, and will inform clients of any known conflict of interest in the execution of our work.
- acts with equity, fairness, courtesy and good faith towards clients, suppliers, and business associates.
- respects client confidentiality provisions in our contracts.
- encourages our clients to undertake projects in a sustainable manner.

CONDUCT REGARDING COMPANY ASSETS

Our employees...

- prudently and effectively use funds and resources.
- use assets, supplies and equipment for company business.
- prepare timely, accurate and complete financial accounts and records.
- will not release or share Golder's intellectual property or confidential data without appropriate permission.

CONDUCT TOWARD INDUSTRY

Golder...

- competes fairly and offers services on the basis of qualifications and experience.
- when engaged by a client to critically review the work of another professional or firm, informs that professional or firm of the commission at an appropriate time in accordance with local professional ethical standards and legal requirements.

CONDUCT AS A MEMBER OF SOCIETY

Golder...

- makes a positive difference in our communities and in the environment.
- does not engage in acts of corruption or bribery.
- acts in accordance with applicable laws of the countries in which we conduct our work.

REPORTING COMPLIANCE CONCERNS

If any employee is aware of a situation that they believe may not comply with this Code of Conduct, is unethical, inappropriate or illegal, they should promptly bring it to the immediate attention, in confidence, of their supervisor(s), unless the incident involves the supervisor(s), in which case it should be brought to the attention of the operating company President or Managing Director.

Any employee may, in confidence, report their compliance concern to an external or alternate internal resource. Resource contact information can be found at:

- <https://golder.alertline.com/gcs/welcome>

Golder treats all reports confidentially to the extent permitted by law, company policy and the need to conduct a thorough investigation. 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

February 2020