

GHD

Integrity Management Guidelines

Rev 8

September 2017



GHD Group Integrity Management Policy

At GHD, we commit to ethical business behaviour in regard to both the internal conduct of our business and our engagement with external stakeholders and the public.

The core values of Safety, Teamwork, Respect and Integrity will guide all our activities.

We will only seek work and participate in business transactions under high standards of corporate ethics and with complete integrity.

We will act in the interests of the client and community while undertaking our services with professional integrity. We will not conspire with any party to defraud anyone or act in an improper manner in our operations. An approach of 'zero tolerance' applies towards any unethical business practices.

We foster an open environment in which our people can report any suspected, fraudulent or other improper practice without fear of reprisal. All reported incidents will be treated in confidence and investigated promptly independently with appropriate follow-up.

We will cooperate fully with external agencies investigating corrupt practices within any legal parameters.

A handwritten signature in black ink, appearing to read 'Rob Knott', written over a light blue horizontal line.

Rob Knott
Chairman

April 2017

A handwritten signature in black ink, appearing to read 'Ashley Wright', written over a light blue horizontal line.

Ashley Wright
Chief Executive Officer

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1. Introduction

1.1 Purpose

In more than 80 years of existence, GHD has established a strong reputation for technical performance, quality, reliability and client relationships. This performance has been built on the foundations of our core values of Safety, Teamwork, Respect and Integrity. As an emerging global business we face many challenges of operating in new markets and with new cultures.

GHD's Integrity Management System (IMS) is integrated within the Management System Framework of the GHD governance model. The IMS consists of the following:

- **[Integrity Management Policy](#)**: Commitment of the Board and Executive to ethical business conduct
- **Integrity Management Procedure** ([QP 1.05.01](#)): Administrative processes relating to monitoring of compliance, investigating possible breaches, and reporting to management and the Board
- **Integrity Management Guidelines**: Policy, principles and rules for our internal conduct and engagement with external stakeholders and the public

These documents are supported by other elements of the Management System, topic specific guidelines and instruction manuals that define controls and processes required to implement the behavioural principles in the Integrity Management Guidelines. Refer Figure 1.

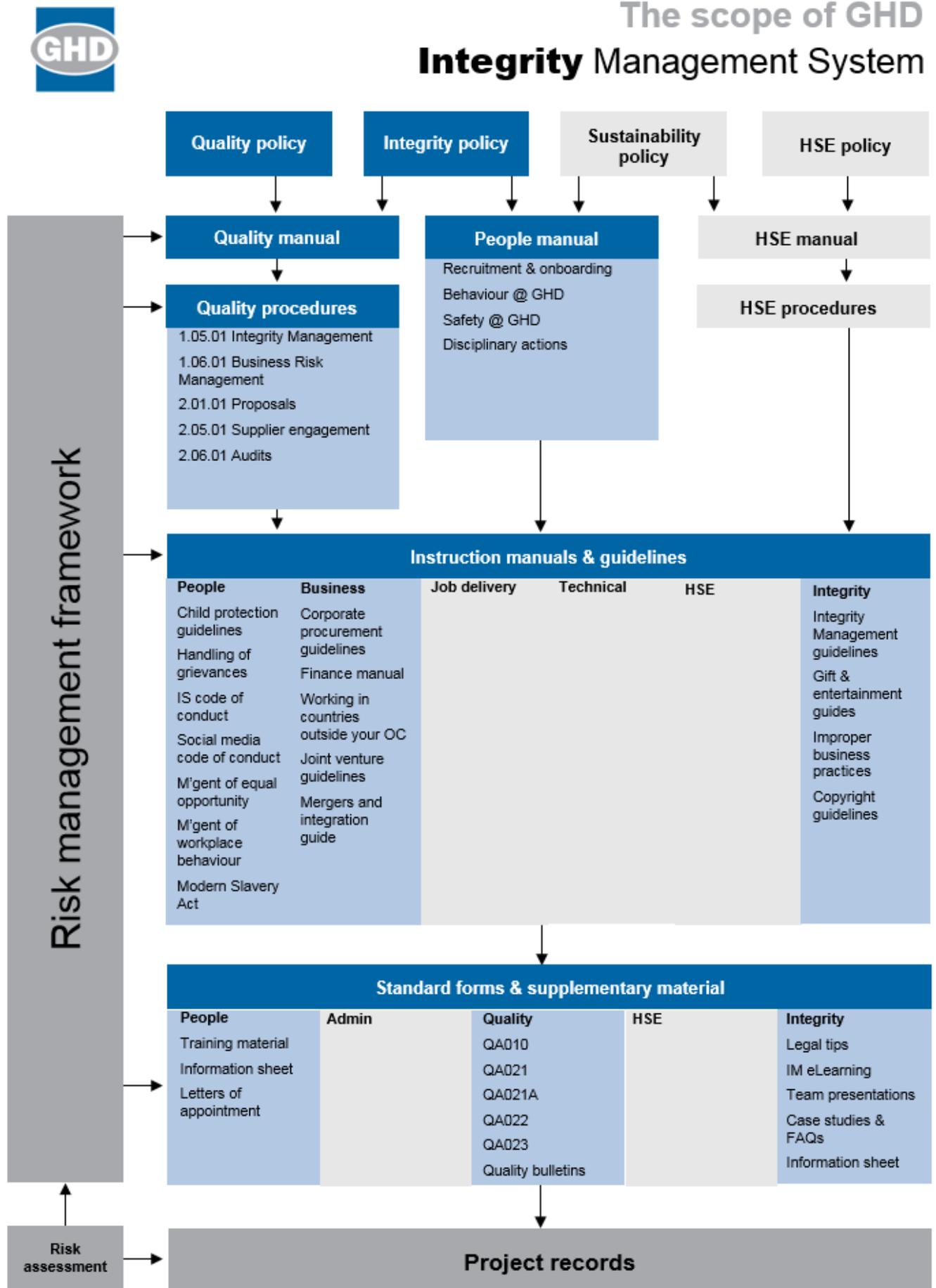
1.2 Integrity management guidelines

These Integrity Management Guidelines apply to all our people (GHD employees [regular and casual] and personnel contracted to work for GHD ["contract staff"] and including employees of all GHD entities and individuals whose conduct is controlled by GHD) with respect to both how we conduct our internal business and treat each other, and how we engage with external stakeholders (clients, subconsultants, subcontractors, suppliers, government agencies and other consultants) and the public.

GHD requires all subconsultants, subcontractors and suppliers to embrace the principles espoused in these guidelines in their own internal business affairs and either meet or exceed these principles. These guidelines are to be read in conjunction with the relevant contract agreements between the parties.

The guidelines have been developed based on international treaties relating to anti-corruption, human rights, privacy and sustainability (as referenced in Appendix A). They are aimed at complementing our values based culture by strengthening awareness of the law and moral standards which are integral to all elements of our business approach. The key message of these guidelines is zero tolerance towards any unethical or improper business conduct.

Figure 1 The scope of GHD Integrity Management System



2. Code of conduct

GHD's [Code of Conduct](#) establishes our behaviour expectations and conduct requirements. GHD will fully endeavour to comply with the laws of the countries in which we operate that are applicable to our work and our people, and promote ethical business and personal behaviour consistent with our core values of Safety, Teamwork, Respect and Integrity.

Safety

We keep our people and stakeholders safe

We intrinsically value the safety of ourselves and others affected by our operations and services. We aim to:

- Manage risk proactively and comply with GHD SAFEguards
- Never let the effects of drugs or alcohol put ourselves or others at risk
- Respect our client's measures to reduce risk and comply with their safety rules
- Implement the Authority to Stop Work when unsafe behaviours or conditions are identified
- Accept personal accountability, reward positive behaviour and discourage unwanted behaviour - **Safety Means Awareness, Responsibility and Teamwork (SMART)**

Teamwork

We are connected

We collaborate within our global community by helping and supporting each other to achieve personal, client and company goals. We aim to:

- Openly communicate and collaborate with all team members and perform all tasks in a timely manner
- Engage in work practices that focus on cooperation and accomplishment, and encourage all team members to participate and share knowledge
- Recognise the skills, abilities and contributions of others and seek to bring the best out in other people
- Understand the commercial nature of our business and add value to our clients' businesses by forming lasting relationships through the delivery of high quality service

Respect

We care

We value each individual and nurture both internal and external relationships through listening and understanding. We aim to:

- Work with mutual respect and treat all people with dignity, fairness, and courtesy and appreciate individual and cultural differences
- Uphold and enhance GHD's reputation
- Maintain a workplace that is free from any form of inappropriate behaviour, unlawful discrimination and harassment or bullying and that creates an environment supportive of reporting of same without fear of reprisal
- Act in a professional manner at all times, demonstrate impartial judgement, be punctual, dress appropriately for the business circumstances, and act with common sense
- Use GHD equipment, services and facilities with utmost care and for the purpose for which they were provided. Protect GHD property, and where GHD has responsibility, the property of clients, from theft, misappropriation and misuse
- Take responsibility for working in a sustainable, healthy and safe manner

Integrity

We keep our word

We embrace honesty and trustworthiness through professional and ethical behaviour with our clients, communities and ourselves. We aim to:

- Abide by applicable laws, regulations and customs applicable at that time and in that location
- Comply with GHD policies, procedures, manuals, codes of conduct, guidelines and associated instructions
- Act honestly and fairly in dealings with colleagues, clients and the general public and look after GHD's business interests
- Never solicit, and refuse to accept gifts, financial payments, favours or benefits that are intended to, would be perceived to, or are likely to cause you to act in a biased manner in the course of your duties
- Never offer, promise or give gifts, financial payments, favours or benefits either directly, or through a third party, which are intended to provide GHD with an improper, unfair, or illegitimate commercial advantage or would be an inducement or reward for a person to act or refrain from acting in relation to the performance of their duties
- Never participate in fraudulent activity or cartels or other anti-trust/competitive activities, money laundering or any other form of corrupt practices
- Maintain the confidentiality of proprietary information, records or materials, whether GHD's or a client's, during and beyond employment at GHD
- Respect GHD's Intellectual Property rights and notify any breaches to the appropriate manager
- Respect the privacy of individuals and comply with privacy laws in relation to the collection, use, handling and storage of other people's personal information
- Avoid any conflict of interest or potential conflict of interest or the appearance thereof and disclose to the appropriate managers any personal matter that may lead to an actual or perceived conflict of interest
- Report to the appropriate managers' improper business conduct where discovered

Any breach of this Code is a serious matter that may result in disciplinary action and impact your ongoing employment with GHD.

3. Basic requirements of conduct

3.1 Compliance with law

Compliance with the law is fundamental to GHD and as such, all GHD people are expected to be aware of and conform with all relevant laws and regulations as applicable to their roles and responsibilities. Violations of the law must not occur.

Regardless of sanctions that could be imposed by laws on the company, any person guilty of a violation will be in breach of their employment duties and therefore subject to disciplinary consequences up to and including termination of employment.

3.2 GHD reputation

GHD's reputation is largely created by the actions and behaviour of all our people. Illegal activity or misconduct of individuals can seriously damage the whole company. Each person should be concerned with maintaining and promoting the proud reputation of the company.

3.3 Management responsibility

The culture of integrity and compliance starts with all leaders and managers across the organisation. All managers are role models, performing their duties of supervision diligently, bearing responsibility for their people and earning respect through exemplary personal behaviour.

Managers provide their people with appropriate latitude and leeway for individual responsibility while making the need for compliance very clear. They remain accessible at all times to assist with people who need to raise compliance concerns, ask questions or discuss a professional or personal problem.

Managers remain responsible to ensure there are no violations of laws within the area of responsibility that proper supervision could prevent. They remain responsible even if they delegate the particular task.

4. Engagement with external stakeholders

4.1 General

GHD is required to interact with a broad range of external stakeholders as part of our everyday business including clients, partners, subconsultants, contractors, and suppliers. We expect the same level of behaviour and compliance from all external stakeholders as we do internally.

4.2 Fair competition and anti-trust laws

Fair competition is fundamental to allowing markets to develop freely and compete for market share. All our people must abide by laws and rules for fair competition.

Anti-trust laws can differ from country to country and case by case. As a guide, the following behaviour is likely to lead to a violation of anti-trust laws in most jurisdictions and therefore not permitted at GHD:

- agreeing with our competitors to behave in the same way regarding prices, output, capacities, sales, bids, profits, profit margins, costs or any other parameter that otherwise provides a basis for fair competition
- entering into an agreement with a competitor not to compete, to restrict dealings with suppliers, to submit bogus offers for bidding or to divide up clients, markets, territories or service programs
- obtaining competitive intelligence by using industrial espionage, bribery, theft or electronic surveillance or communicate knowingly false information about a competitor or its products or services

4.3 Anti-corruption: offering and granting advantages

We compete fairly for our commissions based on quality, price and innovative services, not by offering improper benefits to others. No one may directly or indirectly give, offer, promise, grant or authorise the giving of money, something of value or a benefit to any person, including clients and government officials to obtain an improper advantage or that would be an inducement or reward for a person to act or refrain from acting in relation to the performance of their duties.

Friendly gifts considered for special occasions must comply with applicable laws, and GHD and client policies. Personal favours should not be given.

In addition, our people are not to give money or anything of value directly or indirectly to a subconsultant, agent, intermediary, business partner or other third party if there is a possibility that it may be passed directly or indirectly to a government official or client to influence official action or obtain improper advantage in any business transaction.

People who are responsible for engaging contract staff, subconsultants, project partners and agents must take appropriate action to:

- ensure that all external parties understand and will abide by GHD's anti-corruption policies
- complete a thorough due diligence on all external parties including qualifications, experience, financial status and reputation
- include appropriate provisions in agreements and contracts designed to protect GHD

4.4 Anti-corruption: demanding and accepting advantages

Our people must not use their jobs to solicit, demand, accept, obtain or be promised advantages. This does not apply to gifts of symbolic value or meals or entertainment reasonable in value that are consistent with applicable laws, local customs and GHD's policies.

4.5 Prohibited political contributions

GHD does not make direct or indirect political contributions including donations to politicians, political parties or political candidates. This includes in-kind donations.

GHD people contributing personal donations or payments will not be reimbursed by GHD.

This policy is not intended to fetter GHD people making personal political donations permitted by law, however, they must not be made to influence decisions relating to, or obtain an improper advantage for, GHD.

Where legislation or government guidelines exist for the attendance at political lunches, dinners and other activities, they must be strictly adhered to.

4.6 Charitable donations

As a responsible community member, GHD makes monetary donations and provides pro bono services to selected and worthy community causes through the GHD in the Community initiative.

Donations that are not considered include payment to:

- individuals and for-profit organisations
- private accounts
- payment to organisations whose goals and values are incompatible with GHD
- paid to organisations that by association could damage GHD's reputation

All donations must be transparent and clearly documented including the recipient's identity and confirmation that it was used for the intended purpose.

4.7 Sponsorship

Sponsoring of events organised by a third party in return for the opportunity to advertise at an event and or participate as a speaker and receive entry tickets is acceptable subject to the following conditions:

- a transparent process
- written agreement
- legitimate business purposes
- commensurate value offered by host

Contributions may not be promised, offered or made to secure competitive advantages or other improper purposes. Also, they may not be made to organisations that have incompatible goals with GHD and by association may damage GHD's reputation.

4.8 Government agencies

GHD competes for contracts with government agencies and government owned businesses around the world. In all dealings and interactions, we act in a transparent, honest and accurate way. We comply with applicable laws and regulations relating to procurement including laws prohibiting improper influence of government officials.

The payment of a facilitation fee to public officials to secure the performance of routine government activities contravenes the law in a number of countries. Our people must not, in any country, initiate, participate in, or sanction the payment of facilitation fees to public officials either directly or indirectly through a third party.

4.9 Working with suppliers and subconsultants

GHD requires that its suppliers and subconsultants act in accordance with the following principles:

- prevent corruption
- respect basic human rights of employees
- comply with laws prohibiting child labour
- prevent human trafficking, slavery and forced labour
- take responsibility for health and safety of their employees
- respect personal privacy
- conform to applicable statutory and any applicable international standards regarding environmental protection
- in turn, promote compliance amongst their suppliers of the principles in GHD's Integrity Management Guidelines by applying these principles to their supplier agreements

4.10 Client Relationship Management

Developing and maintaining good client relationships are fundamental to a sustainable business. By nature, these processes often include opportunities for entertainment and gifts. GHD acknowledges that small gifts and entertainment may be offered and accepted but only for acknowledging important social and business milestones and events intended to foster good relationships with care taken to avoid any impression of a reward or encouragement for a favour or for preferential treatment. It is also important to recognise and respect that most clients, particularly government sectors in most jurisdictions, will have their own strict guidelines for accepting gifts and entertainment.

Gifts and entertainment are to be modest and comply with applicable laws and recognised local customs. Compliance with the law is paramount.

Acceptable activities as part of a client relationship management program include:

- inclusion of client's staff in GHD training
- secondment opportunities
- dinners and lunches
- entertainment such as sporting or cultural events

The giving or receiving of gifts of money or money equivalent (such as gift cards) is not permissible.

4.11 Extortion

If any of our People have serious fears of imminent danger to their or another's health, safety or liberty, EMG approval can be sought to make an extortion or facilitation payment in exceptional circumstances which must be made in accordance with the law, transparently recorded and if appropriate, reported to the relevant authorities.

5. Conflicts of interest

5.1 General

It is expected that our people make business decisions in the best interests of GHD and not based on their personal interests. Everyone must inform their manager of any possible personal or business interest that may potentially conflict or give the appearance of conflicting with the execution of their professional duties. Such interest may be a family, financial or other connection.

This is particularly applicable to those people who exercise a direct or indirect influence upon whether an entity, in which they have a direct or indirect interest, receives a GHD contract or the benefit of one of GHD's clients' contracts.

5.2 Competitor organisation

Our people must not operate or assist a company or any enterprise that competes with GHD. An employee must not engage in any competing activities.

5.3 Sideline work

Our people must not have any direct or indirect interest in any outside work or business activity:

- (a) that conflicts with their duties as GHD employees
- (b) which will require use of their knowledge or confidential plans, projects or information, or use of equipment, of GHD or its clients
- (c) that will or is likely to negatively influence or affect them in carrying out their duties as GHD employees or
- (d) that would present the appearance of conflict with a client's interests

Our people are to seek written permission to engage directly or indirectly in any sideline work. Permission will not be granted if it is considered potentially detrimental to GHD's interests. It is expected that approved sideline work will be conducted totally during the individual's own time and not at a GHD workplace.

5.4 Interests in other companies or businesses

Our people must disclose to the Company Secretary, at the earliest possible opportunity, any interest they or a close family member, has or intend to acquire with a client organisation, competitor company or business partner organisation at a level where it is possible to exert any influence on the company's management.

Our people involved directly in project procurement work must also disclose any shareholding or vested interest in a third party stakeholder (e.g., a construction contractor) seeking contracts for projects over which the individual has influence. Disclosure is to be made at the earliest possible time to the individual's immediate manager to avoid conflicts of interest.

Once an interest in another company or business has been disclosed, GHD will take appropriate measures to avoid the manifestation - or mitigate the impact of - the conflict of interest.

All disclosures of interests must be recorded on our Interests Register on BWISE.

6. Company property

GHD utilises a wide range of devices and equipment across the business such as telephones, copying machines, computers, software, internet/intranet, and other technology which is only to be used for official company business. The use of company property must not:

- relate to illegal activity
- cause an actual or perceived conflict of interest
- lead to significant added costs, disruption of normal business or other adverse effects for the company

Information cannot be retrieved, received or transmitted if it is culturally, racially or sexually offensive, is of a violent or criminal nature, includes offensive or derogatory words, images and videos or includes viruses.

No-one is permitted without approval to make records, files, video, audio recordings (including of phone conversations, and then only in compliance with applicable laws) or reproductions using GHD equipment or facilities if the activity is not directly related to company business.

7. Handling of information

7.1 Records and financial integrity

GHD's reputation with clients and stakeholders is enhanced through open and effective communication based upon accurate and truthful reporting. We maintain sound processes and controls so our transactions are executed according to recognised accounting and business practices. All our people are required to ensure all inputs to these systems are:

- complete
- accurate
- honestly reflect each transaction or actual expenditure
- are timely and in accordance with applicable accounting rules and standards

7.2 Confidentiality

Confidentiality must be maintained for all GHD's internal confidential or proprietary information. Non-public information obtained from or concerning suppliers, clients, employees, agents, subconsultants and other third parties must be protected in accordance with legal, professional and contractual requirements.

There is an obligation to maintain confidentiality beyond the termination of a particular relationship as future disclosure can still cause damage to GHD's business or the client's business at that time.

Improper disclosure may result in legal action for breach of confidentiality agreements and for the recovery of damages and/or violations of codes of conduct of professional licensing authorities.

7.3 Data protection and data security

The use of the Intranet and Internet, and worldwide information exchange and dialogue is fundamental to our daily business. This form of communication exposes us to risks related to data security. Acknowledgement of these risks is an important component of IT management, leadership and behaviour of each individual.

High standards must be maintained with regard to data quality and protection against unauthorised access.

Data relating to GHD and/or its clients may only be used during the course of a person's employment and for a legitimate business purpose.

7.4 Personal information

Personal data about a person is handled with respect for the protection of the individual's privacy and may only be collected, used, handled and stored in compliance with applicable privacy laws and regulations.

Personal data must be maintained in a secure manner with appropriate precautions being taken during transmittal.

The use of personal data must be transparent for those concerned and rights safeguarded in relation to correctness and if applicable, to amending, blocking or deletion of information.

Personal Data breaches occur when there is unauthorised access to, disclosure of, or loss of personal data.

7.5 Making a report

We require our people to report any suspected personal data breaches.

Options to report a suspected personal data breach include:

- a) in the Integrity Incident Register on B Wise
- b) through ISHELP
- c) email or phone to the Integrity Compliance Officer
(E integrity.officer@ghd.com | T [+61 7 3316 4374](tel:+61733164374) | V 414374)
- d) via GHD's external website (see below)

8. Health, safety and environment

8.1 Work safety

Protecting the health and safety of our people in the workplace is of the highest priority for GHD. It is the responsibility of all our people to conduct workplace activities in a safe manner recognising the most appropriate accident prevention measure applicable to:

- the technical planning of workplaces, equipment and processes
- safety management
- personal behaviour in the everyday workplace
- the work environment must conform to the requirements of health-orientated design and with applicable laws

8.2 Environment

Through leadership and commitment of our people, GHD strives to conduct its operations in an environmentally responsible manner. All our people are expected to contribute to these goals through their own demonstrated behaviour.

8.3 Working environment

GHD maintains a working environment in all its workplaces that is consistent with GHD Core Values and legislative requirements. It is the responsibility of all our people to conduct workplace activities in a manner consistent with these principles.

9. Reporting and investigating

9.1 Improper business practices

Improper business practices include, but are not limited to any actual or suspected:

- Questionable accounting, internal financial controls and auditing matters;
- Conduct or practices which are illegal or breach any law, regulation, contract or GHD policies;
- Bribery: Offering, promising, giving a bribe to another person, soliciting, agreeing to receive or accepting a bribe from another person. A “bribe” is something intended to bring about the improper performance of another person’s function and is usually associated with gaining an undue business advantage;
- Fraud: Deceiving someone in order to gain an unfair or illegal advantage. Examples include altering records, such as financial records, CVs and reports, and falsely claiming authorship of material;
- Anti-competitive behaviours: Collusive and coercive behaviour. Collusion is a secret agreement between parties to conspire to commit actions aimed to deceive or commit fraud with the object of improper business advantage. Examples include bid rigging and price fixing. Coercion is using one’s position to procure something which is otherwise not merited. Examples include unmerited price reductions or project opportunities;
- Conflict of Interest: Set of circumstances that creates a potential risk that professional judgment or actions involving GHD or client business activities may be unduly influenced by other interests or appear to be unduly influenced. Conflicting interests may be personal, financial or business interests. The conflict may be actual, perceived or potential;
- Abuse of authority;
- Wilful or recklessly negligent mismanagement of GHD resources;
- Unfair or unethical dealings with a client, supplier or business partner of GHD;
- Dishonest activity that causes actual or potential financial loss, or unjust advantage to GHD or any person or associate involved;
- Conduct involving substantial risk to public health or safety or environment; or misuse of sensitive, personal or confidential information;
- Behaviour which contravenes any part of these guidelines.

9.2 Making a report

We require our people to report any suspected improper business practices.

Reports relating to inappropriate behaviour as detailed in the GHD People Manual (e.g. harassment) are to be referred directly to the local people manager.

In the first instance, our people are encouraged to raise concerns with their manager as part of the regular communication between staff and their managers that address questions, concerns, suggestions or complaints. If this is not considered appropriate, the matter can be elevated to a member of the regional Leadership Team or a member of the GHD Legal Team.

If the matter is sensitive, the individual can choose to contact the Integrity Compliance Officer directly (E integrity.officer@ghd.com | T [+61 7 3316 4374](tel:+61733164374) | V 414374).

Options to raise an incident include:

- in the in the Integrity Incident Register on BWISE
- email or phone to the Integrity Compliance Officer
(E integrity.officer@ghd.com | T [+61 7 3316 4374](tel:+61733164374) | V 414374)
- via GHD's external website (see below)

Any report of improper business conduct must be factual and made in good faith. Malicious or bad faith reports will be met with appropriate discipline, which may be up to and possibly including termination. The report should contain as much detailed information as possible.

9.3 Investigation

All serious allegations will be investigated in accordance with the Integrity Management Investigating Procedure. Investigations will be impartial, fair and adhere to the principles of natural justice and procedural fairness and any legal requirements of the local jurisdiction. All of our people are to cooperate with the investigation team and maintain confidentiality and respect personal privacy as required.

9.4 Findings and action

Where the investigation finds wrongdoings, GHD is committed to take action in relation to staff involved and make changes to inadequate processes as necessary. Where illegal conduct has occurred it will be reported to relevant legal authorities as required by law.

Appendix A

Major legislation, conventions and guidelines

Major legislation, conventions and guidelines

OECD Guidelines for Multinational Enterprises (2000)

UN Global Compact 10 Principles for Sustainable Business

UN Convention Against Corruption

Universal Declaration for Human Rights (1948)

Foreign Corrupt Practices Act (FCPA) USA – 1977

UK Bribery Act 2010

Modern Slavery Act 2015 (UK)

Australian Corporations Act 2001

Australian Criminal Code Act (1995)

People's Republic of China – Criminal Law

Chilean Labour Law and Law No. 20,393.

Law 20.393, Chile – On criminal liability of legal persons in asset laundering, financing of terrorism and bribery

- Federal (Canada)

Competition Act (R.S.C., 1985, c. C-34)

Conflict of Interest Act (S.C. 2006, c. 9, s. 2)

Corruption of Foreign Public Officials Act (S.C. 1998, c. 34)

- Provincial (Quebec)

An Act Respecting Contracting by Public Bodies, CQLR c C-65.1

Integrity in Public Contracts Act

Qatari Penal Code No 11/2004

UAE Federal Penal Code Article 237

Privacy Laws (various)

All countries have legislation to protect personal information and most countries have law requiring reporting of data breaches. Refer to your specific country legislation.

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