

Transport for London
**Engineering Vehicles:
Design and Supply of Materials**

Environmental Submission

TfL Reference No: PSEC0013

August 2016

ch2m.SM

Please describe how you embed resource efficiency into your design processes for the full life cycle of the product. Please provide an example of how this has been incorporated in a previous project.

Our understanding of resource efficiency principles

We understand the importance of the Mayor's commitment to environmental management and sustainable use of resources, and the role that we, as part of your supply chain) can play in supporting this vision. We have a mature understanding of resource efficiency and successfully embedding these principles into our design processes and those of our clients.

An holistic approach across our operations

We take an holistic view of resource efficiency, considering not only material use and waste, but also energy and water resources over the full life-cycle of the product. Our key principles include:

- **Minimising resource use** – we maximise resource efficiency in the design process by considering the whole life cycle and how resource efficiency can be maximised – and replicating this process through to product and component level
- **Minimising waste** – designing out waste both in production and during the product life
- Where possible, **specifying recycled materials** in products, minimising the use of virgin and non-renewable materials, hazardous or rare materials
- **Designing to ensure durability and ease of maintenance** – where possible, with the goal of zero maintenance, recognising not only the resource efficiency but also the benefits of limiting interruptions on the network for maintenance work
- Taking a **circular economy** approach – designing for disassembly at end of life or in maintenance to ensure products and components can be reused or are readily recyclable

Embedding resource efficiency into our full life cycle design processes

We will integrate resource efficiency considerations into our design process following the approach outlined in Figure 4.1, ensuring it is considered at all key design stages and is given equal consideration alongside other priorities such as quality, programme, cost and safety.

We will follow a logical resource management planning process to maximise opportunities to develop a resource efficient solution from the earliest design stage. Some of the ways in which we will do this include:

- Use of recyclable materials, especially in the component parts of brackets and cabinets
- Modular designs – which deliver economies of scale, fully utilise common components already in use across LU stock
- Use of 3D and other innovative design tools to minimise paper waste and repeat work
- Use of collaborative tools such as Skype and SharePoint to minimise travel to meetings

We will work collaboratively with London Underground (LU) to set clear objectives, targets and KPIs aligned to our key principles, which will be incorporated as key considerations from the outset of the project. We propose these are tracked throughout project delivery at performance management review points using the balanced scorecard and considered at the concept, detailed and final design reviews.

Our approach will integrate resource efficiency considerations into design and engineering meetings throughout the project delivery process and where necessary, hold focused design workshops to address specific challenges.

Mobilisation

Work collaboratively with LUL to set project specific resource efficiency objectives, targets and KPIs for the design brief and include in our Project Management Plan and Quality Plan

Concept Design

As part of the initial data gathering exercise CH2M will engage with the current operator, maintainer, LU and Thales to understand any resource efficiency challenges.

As part of the internal workshop to produce a variety of different concept design ideas we will identify opportunities to maximise resource efficiency over the product life cycle based.

Through the concept design production we will prioritise opportunities and further develop and incorporate viable options.

Detailed Design

Throughout the detailed design phase resource efficiency viable opportunities will be developed into the final product design.

CH2M will develop an Action Plan to ensure we maximise the potential to implement resource efficiency opportunities through assigning owners and actions to incorporate opportunities into the final product and adequately address any risks.

Progress against resource efficiency objectives and targets will be tracked at internal design reviews and LU will be consulted at regular intervals for their review and comments.

Material Supply

Working collaboratively with our supplier partner, LH Group, and integrated into our Procurement Plan and Environmental Management Plan we will use procurement to ensure any resource efficiency specifications are realised in the delivered product.

Figure 4.1: Embedded resource efficiency across project life cycle

At the outset, we will identify opportunities for resource efficiency over the product life cycle, starting at a system level and then considering product and component levels. Figure 4.1 on the previous page illustrates the process we will apply to embed resource efficiency across the project lifecycle.

In identifying resource efficiency opportunities, we will take lessons learned from experience on past projects of a similar scope, from our design process and from our engagement and strong relationship with our key supply chain partner; LH Group.

We will prioritise opportunities based on their potential impact, ease of implementation and whole life cost, seeking opportunities that deliver a cost benefit, while ensuring they do not impact on safety or reliability of the equipment being installed.

Our project management, environmental management, waste management and procurement plans will all support the objective to maximise resource efficiency.

Aligned to our risk and opportunity management process, we will develop a resource efficiency opportunities matrix and action plan to record and track opportunities (or risks) throughout the design process. Ian Chapman, our project manager will ensure they are implemented, measured and the benefits are captured.

In Section 2 of our submission, we have described the way in which we will manage material supply. We will ensure that we integrate resource efficiency principles, alongside other requirements of the Greater London Assembly (GLA) Responsible Procurement Policy to ensure any resource efficiency opportunities are realised in the delivered product as well as all materials meeting responsible sourcing requirements.

Previous experience to deliver

CH2M and our supplier partner LH Group bring a wealth of experience in responding to client's sustainability challenges and delivering practical innovations and

design changes to products to both improve product quality and deliver whole life resource efficiency benefits.

Included here are examples from both CH2M and our supply partner, LH Group, where we have successfully embedded resource efficiency into our design process. While the first example CH2M provides is not rail sector, the principles applied are the same as we propose for this contract, and have been proven to demonstrate tangible benefits.

Project example: Aone+ managing agent contracts, Highways England

CH2M is part of the A-one+ consortium, managing design and operation of assets for Highways England. A-one+ have implemented measures which have embedded resource efficiency throughout the way they work which cover:

- Policy and commitment
- Measurement and monitoring
- Procedures, plans and regulation
- Culture change and knowledge management
- Innovation and challenging 'the norm'
- client and regulator engagement
- Supply chain partnership

Working with supplier VersCo, A-one+ are the first managing agent to use renovated Vehicle Restraint System (VRS) beams. This is a step change in resource efficiency by increasing the lifespan of safety barriers through renovating and re-using beams.

Working in partnership with Morelock Signs Ltd, A-one+ were one of the first companies to use the multi-purpose glass-resin reinforced polyester (MP GRP) material on the highway network for permanent signs. The material has been used to replace the standard aluminium used to make sign structures. The key benefits that have arising from this are:

- Costs savings of around 12% saved on scheme delivery compared to traditional products; MP GRP is made of recyclable materials, and is also recyclable at the end of its life
- Carbon footprint data shows MP GRP has between 50-70% less embodied carbon than aluminium
- Increased material security – there is no scrap value for MP GRP signs; therefore, resource and money is not wasted on replacing stolen signs
- Improvements in health and safety – MP GRP is 40% lighter than aluminium, making the signs easier and quicker to install, reducing risks from manual handling

We designed a programme using new technology to maintain filter drains in situ leading to: recycling of 10,400 t of drain aggregate; reducing 1,300 lorry movements; reducing carbon footprint by 107 t and avoiding £26,000 in landfill tax.

Project example: LH Group, various

Our material supply partner, LH Group, have implemented various product improvements through engineering and workshop initiatives to respond to client challenges. For example, while working for Irish Rail in response to oil leaks occurring on **Class 22000 PowerPacks**, their team developed a redesigned and improved bell housing unit, not only addressing the initial problem – of preventing oil leaks – but also developing a 'zero maintenance' solution. This eliminated the need for additional checks during service, offering clear whole life resource efficiency benefits.

Another example of design improvements from LH Group has been the redesigned **Turbostar 'Airflow' PowerPack** radiators. Responding to incidences of failures and damage due to the traditional radiator fin design, they developed an alternative design, that has not only eliminated these failure, through being more

easily cleaned and improving the durability and lifespan of the product, but they improved cooling efficiency (and hence energy efficiency) of the new design.

Project example: strategic resource management planning process, WRAP

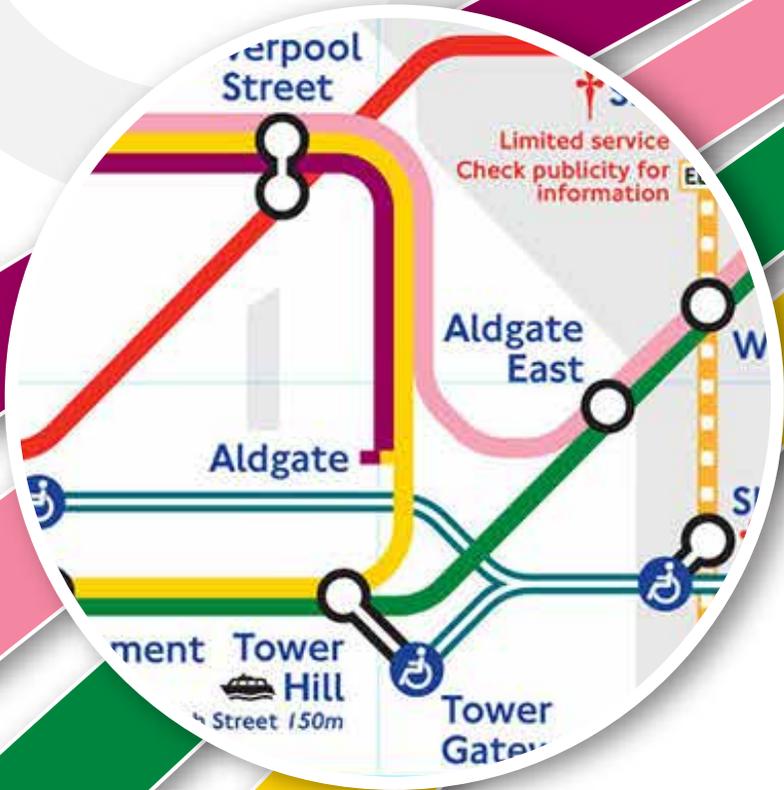
We have also worked with clients to inform the development of sustainability targets, including resource efficiency. The Waste and Resources Action Plan (WRAP) works with business, government and communities to improve resource efficiency.

CH2M was part of a consortium that developed and tested the Resource Management Planning (RMP) process for WRAP – a management framework to help consider and manage the key resource efficiency components for a project, across its lifecycle.

Following the successful trial for the RMP process, WRAP has rolled out the process and supporting documents to the UK construction industry.

Working in partnership with our clients: **HS2, Thames Tideway** and Highways England on the **Lower Thames Crossing** we are helping to develop their sustainability targets, objectives and KPIs, setting clear goals for designers and contractors over the life of the projects with a focus on efficiency as well as durability and reliability and embedding these targets and requirement into contracts.

As Delivery Partner for HS2, we supported the client to develop their approach to sustainable materials, including helping to develop the process for embedding resource management planning into their design processes. This delivers benefit through having a clear process to follow, which is included in contracts and sets clear targets and expectations for contractors. This builds on our previous work for WRAP and aligns to the new BREEAM Infrastructure standard – which we are also developing through projects such as HS2 and Thames Tideway.



Transport for London

Engineering Vehicles: Design and Supply of Materials

Equality and Diversity Submission

TfL Reference No: PSEC0013

August 2016



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Bidders should prepare and submit the following documents: Equality Policy and Diversity Training Plan.

Delivering services which promote ethical and inclusive business practice

CH2M's mission is to have a diverse and inclusive business culture that values every staff member's background, skills and potential. We recognise that to maintain our competitive edge we must encourage everyone to contribute to the company's growth and success.

ADDING VALUE

The Little Yellow Book, written by CH2M founder James Howland in 1982, captures the values on which the firm was built. This is the cornerstone of our culture and behaviour within the workplace, and employees are expected to respect one another, have honest, integrity and trust, a commitment to the community and to stay true to the company value of inclusiveness. All employees have provided with a copy of the Little Yellow Book upon joining the company (it is available in nine languages) in order to promote these values globally and as a reminder to challenge behaviour which is inappropriate.

We have developed an Equality and Diversity Strategic Plan and Equality and Diversity Training Plan which reflect this commitment and explains our approach to embedding this across our delivery of the 4LM Engineering Vehicles: Delivery and Supply of Materials (4LM) project. These Plans illustrate our approach, and are based on our Equality, Diversity and Inclusion (EDI) policies and corporate strategies. They also illustrate the way in which our service on this project might contribute to TfL's broader ambitions:

- To promote equality of opportunity

- To promote good relations between different groups and communities
- To eliminate unlawful discrimination
- To provide accessible transport for all.

On contract award we will work closely with TfL to review our Plans and identify any more specific equality, diversity and inclusion objectives which might be appropriate for this contract, Stuart Brown, our Senior Project Manager, will have ultimate accountability for the delivery of these equality and diversity objectives and plans. He will ensure that they are reviewed during mobilisation, with TfL, and on an annual basis over the period of the project.

Our EDI strategy

CH2M's policy is to ensure, promote and maintain a work environment free from all forms of harassment and discrimination, including harassment and discrimination based on UK legislation; the Equality Act (2010) and equivalent US equality legislation. This applies to service delivery, employment and our supply chain. We lead from the very top on our approach to equality and diversity - our CEO, Jacque Hinman, has made a personal commitment to lead the journey to a more diverse workforce - a positive reflection of this is the 50:50 split between men and women in the top team which she leads. Our EDI strategy is focused on achieving a number of outcomes, and these are reflected in the measures we have proposed for the 4LM project:

- Strong stewardship and commitment from senior leaders with EDI as a core attribute of CH2M's identity at all levels of the organisation
- Accountability for EDI from all levels of leadership
- Increased employee awareness of our EDI

initiatives and the benefits of this approach

- EDI becomes a sustained component of our culture with relevant metrics embedded in all our employment and business processes
- Attract, develop, engage and retain the best talent

In 2015, we undertook our first confidential, online, EDI census. This went to all employees, and looked across all nine protected characteristics as described in the Equality Act (2010) - age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion and belief, sex and sexual orientation, as well as our workforce with caring responsibilities and/or flexible working requirements. This survey provided a rich baseline of data which we compared with the Office of National Statistics as a measure of our trends versus the population in the UK.

The results of this survey are being refreshed through the 2016 survey which is currently in progress, however, we have provided just a snapshot of our 2015 results for age, gender and ethnicity, as illustrated in Figure 6.1. This understanding of the current diversity of our workforce and has helped inform the development of our policy and strategic planning objectives. Indeed, in 2016, we are introducing our first **Equality and Diversity Council** to help us drive forward our objectives and better monitor our practices, policies, process and actions in the UK.

INNOVATION

In 2015, our JuMP UK network for junior and middle level professionals won Employers Network for Equality and Inclusion (ENEI) national awards. The ENEI is the UK's leading employer network covering all aspects of equality and inclusion issues in the workplace.

Our Equality and Diversity Policy

Our current policy covers four key areas:

Non-discrimination - ensuring equal employment opportunity to all job applicants and employees, and to make employment-related decisions based upon qualifications and abilities without regard to: race, colour, creed, religion, sex, national origin, age, disability, veterans' status, sexual orientation, citizenship, gender identity, genetic information, marital status, and any other status protected by law. We recruit, hire, assign, transfer, promote, train, compensate, provide benefits, and administer programmes without consideration of these differences. And we provide a work environment free from discrimination and harassment based upon any of these protected differences.

Individuals and subcontractors - we will not discriminate on the grounds of race, religion, color, sex, national origin, age, or disability in the selection and retention of subcontractors, including in the procurement of materials and leases of equipment. In all solicitations, either by competitive bidding or negotiation, including for procurements of materials or equipment, each potential subcontractor or supplier shall be notified of its obligations under the contract and our commitment to nondiscrimination on the grounds of race, color, national origin, sex, age, disability, and low income status.

Valuing Diversity and Inclusion – we are committed to valuing diversity in all respects. Embracing differences provides dignity and worth to each of our employees and promotes an environment in which all employees are free to realise their full work potential and meaningfully contribute to the fulfillment of our goals.

Affirmative Action – we positively seek out qualified minorities, women, disabled individuals, and protected veterans for hire and promotion as opportunities arise and are firmly committed to the advancement of these individuals at all levels of management and decision-making positions.

The way in which we will develop our policy objectives and measures for TfL has been set out in the Table 6.1, our Equality and Diversity Strategic Plan. To support and strengthen this plan, we have provided, our Equality, Diversity and Inclusion policies which best reflect the aims of TfL, specifically:

- **Employee Ethics and Business Conduct Principles**(Appendix 6.1) – this document is a cornerstone of the CH2M approach and underpins all of our approach to equality, diversity and inclusion, and more generally, the way in which we do business.
- **'Equal Employment Opportunity, and Affirmative Action Policy'** (Appendix 6.2), **'Disabilities and Reasonable Accommodation Policy'** (Appendix 6.3), and **'Anti-Harassment and Non-Discrimination Policy'**(Appendix 6.4) – these policies cover race, gender, disability, age, faith and sexual orientation and include provision for current UK legislation. These policies shape our recruitment and employment procedures which have been developed to ensure that we do not discriminate, create unfair conditions of employment or create unequal rates of pay, particularly between men and women.

- **'Supply Chain Ethics and Business Conduct Principles'**(Appendix 6.5), **'Anti-Bribery Policy'** (Appendix 6.6) and **'Anti-Bribery Corruption Policy'** (Appendix 6.7) – these policies set out our expected behaviours, and the non-negotiable position we hold around ethical behaviour as it applies to working with suppliers and third parties, at all times, including as this applies to equality and diversity issues.

INNOVATION

We recognise employees and projects that have successfully increased spend or exceeded sub-contracting goals with small and diverse businesses.

In monitoring the diversity of those sub-contracting to us, we are able to assess our progress to strive towards providing equitable sub-contracting opportunities for these small and diverse businesses through:

- Contracting to qualified minority and women-owned small businesses
- Ensuring competition by structuring sub-contracts to allow the largest number of qualified small and businesses to compete
- Training programme/project managers with regard to their socio-economic responsibilities

Reporting on the achievement towards our small and diverse business sub-contracting goals in compliance with our clients' contractual requirements.

CH2M 2015 Survey Analysis

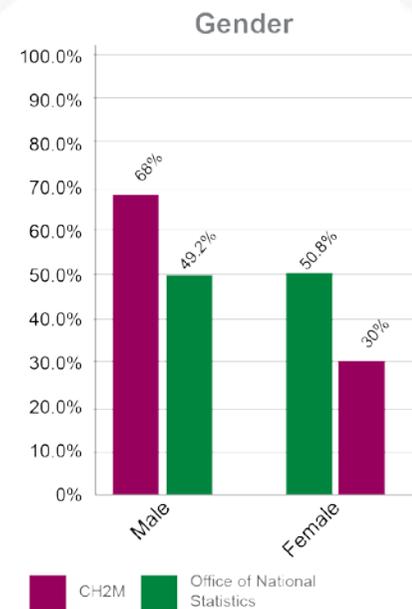
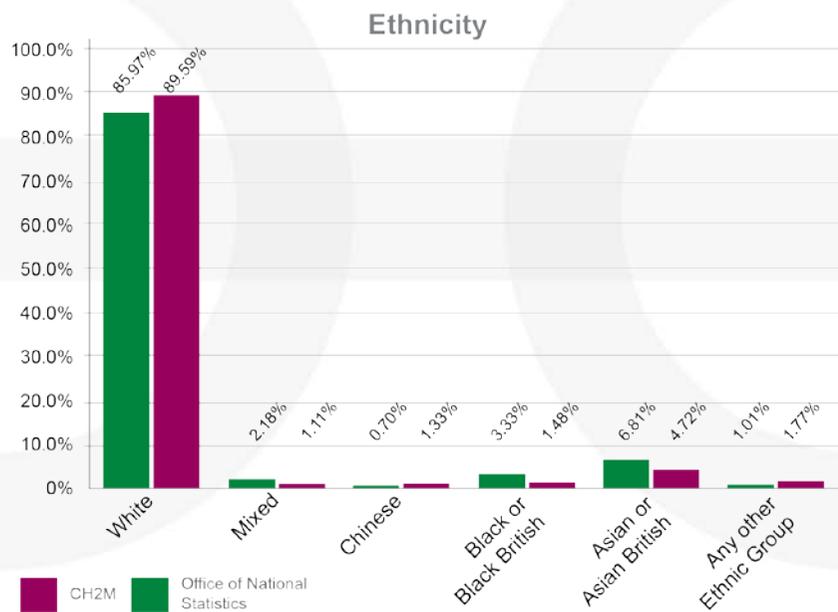


Figure 6.1: Headline results of our 2015 Diversity Census

Table 6.1: Our Equality and Diversity Strategic Plan

Current position/Baseline	Action/task	When	Person responsible	Resource implications	Measure of success
NON-DISCRIMINATION					
Equality and Diversity Objective 1 – We will ensure that equal employment opportunity is available to all job applicants and employees, and to make employment-related decisions based upon qualifications and abilities without regard to race, gender, disability, age, faith or sexual orientation					
<p>Our Policy emphasises our commitment to providing equal opportunities to all job applicants and employees across the full employee life cycle - recruitment, hiring, transferring, promotion, training, compensating and providing benefits.</p> <p>Current baseline figures for gender, age and ethnicity have been provided in Figure 6.1. Other data is available on faith, disability, sexuality and caring responsibilities, and can be provided if this is required.</p>	<p>We will undertake an annual survey of members of the 4LM project team to monitor diversity.</p>	<p>Annually</p>	<p>One HR – we operate a system whereby HR representatives partner with business leaders.</p> <p>Stuart Brown – Senior Project Manager</p>	<p>Survey analysis, provided centrally</p>	<p>Positive change in employee demographic and diversity.</p>
Equality and Diversity Objective 2: We will recruit, hire, transfer, promote, and train 4LM team members without regard to race, gender, disability, age, faith or sexual orientation.					
<p>We have a clear equal opportunity and disability accessibility statement on all recruitment advertisements confirming our commitment to being an equal opportunity employer. Similarly, our contingent labour providers, Agile 1, also clearly state their commitment to equality and fairness as part of their recruiting processes to ensure we attract a population of candidates reflective of the local diverse areas.</p>	<p>We will monitor the diversity of our local communities – in this case Derby, to ensure that our team reflects the local population demographics.</p> <p>We will ensure that job adverts clearly provide reasonable accommodations and clearly state our commitment to diversity during recruitment process.</p> <p>We will advertise all vacancies using a variety of sources and mediums to attract diverse candidates.</p>	<p>Continuous</p>	<p>One HR</p>	<p>Recruitment partner support, provided centrally</p>	<p>Monitor candidate diversity as part of the recruitment/resource process.</p> <p>Feedback from new hire surveys and annual review of new hire survey content.</p>
<p>For promotions, and to monitor equal pay, we have generic job descriptions, professional role matrices and a well-defined grading structure with corresponding global and local salary grading, which provide a common job architecture and ensure</p>	<p>We will ensure that all job descriptions are available on the Intranet site for all supervisors to set roles and</p>	<p>Continuous</p>	<p>OneHR</p>	<p>HR Business Partner support, provided</p>	<p>Internal and external benchmarking of grade and salary to ensure consistency and equality.</p>

Current position/Baseline	Action/task	When	Person responsible	Resource implications	Measure of success
internal equity. We are therefore able to fairly manage and monitor reward and compensation; provide global consistency and transparent process to career progression; and give discipline and governance. We structure managers' decision-making approaches to ensure promotions are accountable, robust, and comparable to peers and objectives, with rigorous approval processes to reduce the risk of discrimination.	grading within the 4LM team.			centrally	
Equality and Diversity Objective 3: We will provide a work environment free from discrimination and harassment.					
Our Equal Opportunities Policy is also supported by our Employee Ethics and Business Conduct Principles, a living document that is periodically updated to reflect our changing business and evolving regulatory environment. All employees regardless of seniority, are required to review the principles annually and take, <i>and pass</i> , a training course and quiz on the key components embedded in the document. As a condition of employment at CH2M, all employees are required to commit positively to follow these principles, which includes confirming their commitment to our diversity and equality policies.	All new hires will attend a corporate induction in our London office and complete mandatory online induction process. Our 'onboarding' process raises awareness for all policies and procedures of fair and equal treatment at work. All employees undertake an annual test and training on ethics and business conduct, which includes EDI topics.	Induction Annual	One HR and Stuart Brown	Project team time	100% attendance rate at corporate induction. Employee Ethics and Business Conduct Principles training pass rate over 80%. New employees must complete within 3 months of start date.
Employees have a number of routes if they wish to report any violations of the company's policies: their supervisor, HR Business Partners, or a confidential hotline called ' <i>The GuideLine</i> '. This allows our employees to seek guidance, ask questions or report concerns about possible violations of standards of business conduct that are a part our Employee Ethics and Business Conduct Principles. When employees contact <i>The GuideLine</i> they may choose to remain anonymous or they can say who they are without fear of retaliation.	All employees will be made aware of the reporting procedure and <i>The Guideline</i> which is available 24 hours a day, seven days a week, 365 days a year, anywhere in the world	Continuous	One HR	HR Business Partner support, provided centrally	All cases investigated within 24 hours of being raised, or an appropriate timeframe to allow for a fair and thorough investigation to take place into the reported incident and any identified corrective actions implemented. Complainant's anonymity is assured.
INDIVIDUALS AND SUBCONTRACTORS					
Equality and Diversity Objective 4 – We will not discriminate on the grounds of race, gender, disability, age, faith or sexual orientation in the selection and retention of subcontractors, including in the procurement of materials and leases of equipment.					
Our successful and active <i>Supplier Diversity Programme</i> develops schemes and initiatives that provide subcontracting opportunities and partnering relationships for small and diverse	We will monitor LH Group's commitment to EDI, by including their team in our	Ongoing	Alex Savoury, Assistant Project	-	To increase the number of small and diverse businesses supplying to this project.

Current position/Baseline	Action/task	When	Person responsible	Resource implications	Measure of success
<p>business enterprises. Our Supplier Diversity Programme Policy Statement is signed by Chief Executive Officer Jacque Hinman, and distributed throughout the company.</p> <p>In the past 5 years, we have sub-contracted £13.6 billion in support of project delivery around the world. Of this, we sub-contracted £2.7 billion (19.6%) to small business enterprises (including those owned by minorities, woman, or those in the LGBT+ community).</p> <p>To deliver the 4LM project, we have identified our key supply chain partner, LH Group, because they have proven capacity to deliver, and are aligned with our ethics and business conduct policies and practices.</p>	<p>annual survey, and support strategies to increase spend with small and diverse businesses through the material supply elements of this project.</p>		<p>Manager – key link to LH Group and their supply chain</p>		
<p>VALUING DIVERSITY AND INCLUSION</p>					
<p>Equality and Diversity Objective 5 – We will value diversity in all respects, embracing differences and promoting an environment in which all employees are free to realise their full work potential and meaningfully contribute to the fulfillment of our project goals.</p>					
<p>Our Global Diversity and Inclusion Department will partner with TfL and our 4LM team to ensure our project team members commit to EDI in their everyday jobs by:</p> <ul style="list-style-type: none"> Working to establish a culture of respect and tolerance for colleagues and our clients from every culture and ethnicity to create an inclusive work environment where all employees feel valued. Conducting cross-cultural training and coaching to ensure our employees work as ‘One team’ 	<p>Strong stewardship and commitment from senior leaders on the 4LM team to access meetings and activities provided by the Global Diversity and Inclusion Office.</p>	<p>Continuous</p>	<p>Stuart Brown</p>	<p>Project team time</p>	<p>Increased employee awareness of the EDI strategy and its benefits</p>
<p>The diversity of our workforce is reflected in the variety of networking groups that promote and nurture a rich array of perspectives and which embrace diversity and difference. Open to all employees to join and participate, these networks are:</p> <ul style="list-style-type: none"> JuMP – Junior and Mid-Level Professional Network Group Black Employee Network Group – Harambee, which means “working together” in Swahili LIFE – Leadership Inspiring Full Equality (Gay, Lesbian, Bisexual, Transgender, and Allies Employee Network) SHARE – Sharing Across Respective Ethnicities (for employees of all ethnicities to collaborate and learn from one another) Women’s Network 	<p>We will promote and encourage membership of employee networks and provide access to employee network forums, presentations and support.</p>	<p>Continuous</p>	<p>Ian Chapman</p>	<p>Time out of project-related tasks</p>	<p>At least 50% of the 4LM team to be a member of an employee network.</p>

Current position/Baseline	Action/task	When	Person responsible	Resource implications	Measure of success
<ul style="list-style-type: none"> A.C.E. – Assist, Connect, Educate – Disabled Employee Network Group <p>The network groups are fundamental to the promotion of our approach to promoting a diverse workforce.</p>					
AFFIRMATIVE ACTION					
Equality and Diversity Objective 6 – We will positively seek out under-represented groups for hire and promotion as opportunities arise					
<p>All opportunities - whether they be entry into, or progression within, the company - are based on individual merit irrespective of hours of work, age, disability, gender, gender reassignment, race, religion or belief, sexual orientation, pregnancy or maternity leave, or marital status.</p> <p>We are aware that the Traction and Rolling Stock industry is not particularly diverse, as reflected in our current team. However, we have over 50 STEM ambassadors (around 15% of our 4LM project team) who deliver bespoke activity in schools from career talks, mentoring for CREST awards, practical STEM lessons, speed networking and STEM club support.</p> <p>Our new competition; ACE (Access to Construction and Engineering Challenge) also involves teams of Year 9 girls producing a campaign to encourage girls into engineering and construction jobs.</p>	<p>We are committed to positively supporting under-represented groups into the team, as opportunities become available.</p> <p>We will work with schools, colleges and employment agencies to ensure that we promote this team, and the rail industry, in a more inclusive light, and inspire under-represented groups to join.</p>	Continuous	STEM Ambassadors	Project team time	<p>Numbers of school events (tbc).</p> <p>Number of schools engaged and relationships built (tbc).</p>

Our Equality and Diversity Training Plan

CH2M provides comprehensive training and development opportunities for all of our workforce. We have a dedicated Talent Management and Development intranet portal which provides all employees with 24-7 access to curricula aligned to the company's values, including on equality and diversity. The courses complement our internal policies relating to EDI, as previously described, and give a broader understanding of workplace equality in areas such as:

- Managing diversity
- Understanding workplace diversity
- Diversity awareness simulation
- Managing a diverse team

Training is provided to all new people managers on leadership responsibilities to ensure they are fully equipped to lead on this important topic. This management training includes an orientation on the company's approach to EDI. Our **'Manager Essentials'** training embeds this approach further. It covers a multitude of topics such as:

- Engaging Your People
- Coaching Your People
- Hiring
- Developing Your People.

ADDING VALUE

We are currently focused on training hiring managers and supervisors on unconscious bias; working with Employers Network for Equality and Inclusion (ENEI) and Women In Science and Engineering (WISE), who are new corporate partners for CH2M in 2016.

The **'Manager Essentials'** modules are developed further to include complementary resources focused on EDI such as book abstracts, videos and workshops, and is developed across all the workforce as part of our induction and orientation process which is mandatory for all employees.

We also recognise the role we have to play in encouraging new entrants, especially those from under-represented groups, into our industry. We are working incredibly hard, especially in London, to make promote our sector and encourage more diverse applicants. In particular, we encourage traineeships and apprenticeships across our workforce and work closely with organisations such as the Social Mobility Foundation, alongside schools and industry bodies such as ICE to promote a diversity in engineering. Through the Social Mobility Foundation, we are helping high-achieving young people from low-income backgrounds into the top universities and professions. We are involved in two of its core programmes, the Aspiring Professionals Programme and the Speaker of the House of Commons Parliamentary Placement Scheme. As part of this project, we sit on the Social Mobility Foundation Board. Our employees provide mentoring and placement opportunities for young people who are engaged on the Social Mobility Foundation programmes.

ADDING VALUE

In 2015, CH2M hosted a group of 25 interns from the Social Mobility foundation for one week. Throughout the week, the students were exposed to the world of bridge design, rail infrastructure and transport planning and programme management. They were also coached by human resources, current graduates and apprentices on the educational paths that would lead them to a career in engineering. This project is currently being repeated in 2016, and is intended to become an annual event.

CH2M's first cohort of apprentices joined the company in 2011 and year on year we have increased the number of apprentices that join. At present we have 38 apprentices in the company and have committed to at least a further 15 apprentices this August/September. In addition, we hold a seat on the Technical Apprenticeship Consortium (TAC) and are currently appointing members to sit on the regional working groups that feed into TAC.

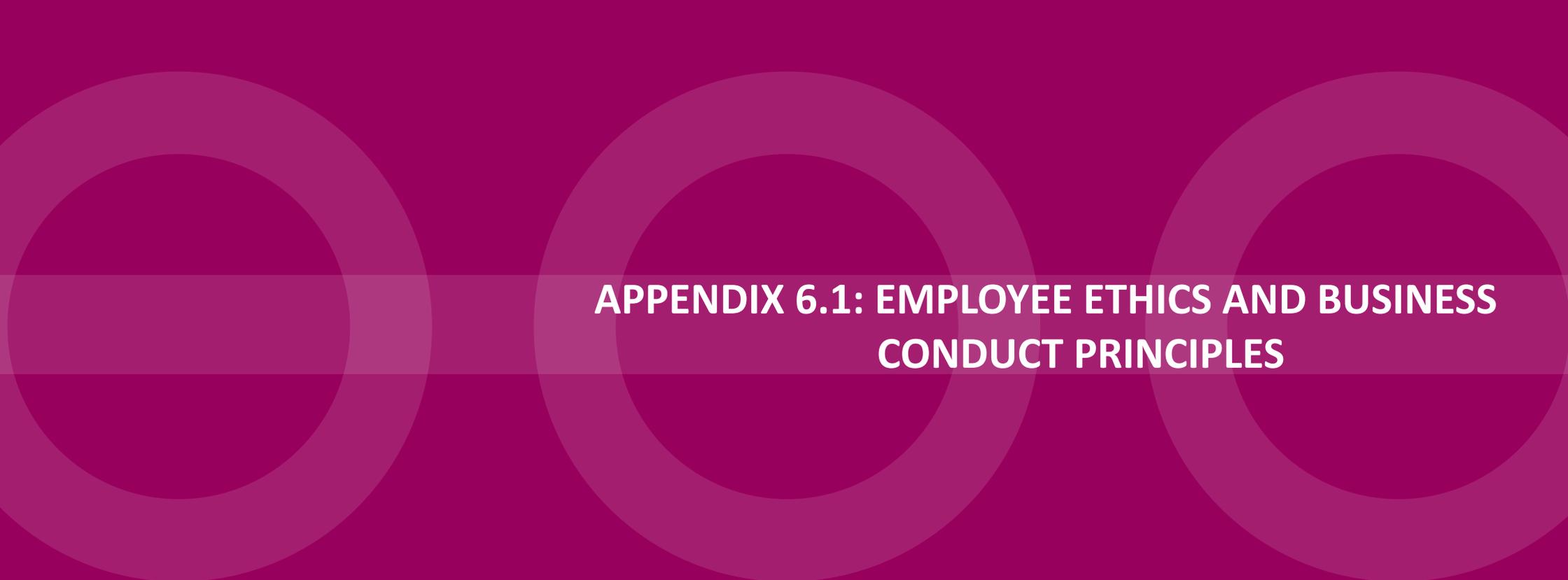
ADDING VALUE

As Delivery Partner for the Thames Estuary Asset Management 2100 flood de-fence programme (TEAM 2100), we committed to a 5% target for intern/apprentice staff on the programme. We have been working hard on this programme since 2014 - supporting schemes such as the Engineering Education Scheme (Royal Academy of Engineering), ICE under-19s programme and Year-In-Industry students with a view to one day seeing young people enter the engineering and environmental professions. To date, we have 7 % intern/apprentices on this key infrastructure improvement project, so are already exceeding this target.

6.2: Our Equality and Diversity Training Plan

Current position/Baseline	Action/ task	When	Person responsible	Resource implications	Measure of success
Equality and Diversity Objective 7 – We will continue to maintain and enhance our equality and diversity training programme across our workforce					
<p>All employees are required to review our Employee Ethics and Business Conduct Principles annually, undertake a training course and quiz. This reaffirms their commitment to the EDI work environment and embracing and accepting local cultures non-discrimination and anti-harassment.</p> <p>All employees must undertake this test and achieve 80%.</p>	<p>We will ensure that all employees – including those from our supply chain partner, LH Group, who are working on the 4LM project, undertake the online Ethics and Business Conduct Principles course, which includes equality and diversity</p>	<p>Annually, or within 30 days for new starters</p>	<p>One HR and Stuart Brown, Senior Project Manager</p>	<p>Project team time – normally one hour</p>	<p>100% completion rate of mandatory test. Training pass rate over 80%.</p>
<p>All new managers with supervision responsibility are expected to attend our ‘Managers Essentials’ training programme, which includes specific modules on EDI topics.</p>	<p>All new people managers will receive ‘<i>Manager Essentials</i>’ training by HR Business Partner.</p>	<p>Ongoing</p>	<p>OneHR</p>	<p>Project team time</p>	<p>100% attendance at Manager Essentials training for all managers with responsibility for recruiting, or developing others.</p>
<p>In 2016, we have extended our approach towards management training, through partnerships with the Employers Network for Equality and Inclusion (ENEI) and Women in Science and Engineering (WISE). In particular, we have developed an Inclusive Leadership diagnostic tool, to recognition and action on unconscious bias.</p> <p>We hope that this will strengthen our leadership teams and bring us closer towards achieving our aims to embed EDI as a core attribute of our identity at all levels of the organisation, and improve accountability at all levels of leadership.</p>	<p>We will implement our Inclusive Leadership diagnostic tool with the leadership team on 4LM.</p>	<p>Ongoing</p>	<p>One HR</p>	<p>Project team time</p>	<p>Diagnostic tool assessments – with relevant action plans where issues/areas for improvement are identified.</p>
Equality and Diversity Objective 8: To provide access to training and development opportunities for people in traditionally excluded or under-represented groups in our industry					
<p>We are fully committed to the development of our apprenticeship programme, and believe that it the responsibility of the industry as whole to build engineers to meet the needs of the future.</p> <p>At present we have 38 apprentices working across the UK, a number which we anticipate will increase to over 50 later this year.</p>	<p>We will work with TfL to identify any roles suitable for apprenticeships and either provide placement opportunities for TfL apprentices, or create similar opportunities through our own apprenticeship programme.</p>	<p>2017</p>	<p>Stuart Brown</p>	<p>Role within the 4LM organisation structure</p>	<p>Apprenticeship place identified and filled within the 4LM team.</p>

Current position/Baseline	Action/ task	When	Person responsible	Resource implications	Measure of success
<p>We offer work experience for post 16-year-old students with a structured programme in place to ensure they gain the most from the experience with us.</p> <p>We take around 20 students a year through this type of scheme.</p> <p>Just in July this year, we have supported a young woman from a local secondary school in Derby on one weeks work experience.</p>	<p>We will promote work experience opportunities in Derby, and engage with local schools to offer work experience opportunities.</p>	Ongoing	Stuart Brown	Project team time	<p>Number of work experience students placements.</p> <p>Feedback from work experience students.</p> <p>Numbers of returning students either to extended work experience opportunities or via apprentice route.</p>
<p>We lead a skills programme for young people and the long-term unemployed; CH2M <i>'Pathways to Work'</i> programme, providing free training and advice on how to successfully enter the recruitment market and find employment. The programme assists people with CV writing, job searches (using social media) and various types of interview preparation.</p>	<p>We will work with TfL to identify appropriate opportunities to replicate this programme for the benefit of this project.</p>	Ongoing	Corporate and Social Responsibility (CSR) Team	-	<p>Number of opportunities identified to support mentoring through Pathways to Work.</p>
<p>Equality and Diversity Objective 9: To ensure that our Equality and Diversity Plan and training is effectively reviewed and resourced to meet TfL requirements</p>					
<p>Our EDI Office is responsible for developing and championing EDI training; 2016 has a key focus on unconscious bias training.</p> <p>We take a blended approach to training which means there are a number of methods our employees can follow to access training. This makes our programme very accessible and means resourcing is focused on face to face training support, complemented by a range of videos, online learning, and webinars.</p> <p>Our Talent Management and Development intranet portal gives all employees 24-7 access to curricula aligned to the company's values on equality and diversity. The course complements our internal policies relating to EDI and give a broader understanding of workplace equality in areas such as: managing diversity, understanding workplace diversity, diversity awareness simulation and managing a diverse team.</p>	<p>We will maintain access for all employees to the current training and guidance offered on EDI and ensure that all of the 4LM team has undertaken some form of EDI training – either through STEM placements, mentoring, or formal training modules, on an annual basis.</p>	Annual	OneHR and Stuart Brown	Project team time	<p>Annual pass rate of the Employee Ethics and Business Conduct Principles.</p>



**APPENDIX 6.1: EMPLOYEE ETHICS AND BUSINESS
CONDUCT PRINCIPLES**

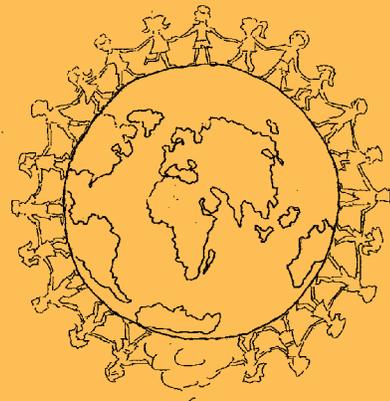




Employee

Ethics & Business Conduct

Principles



On the Cover

The illustrations on the cover and throughout this document are courtesy of Bill Shrader and Ric Lecznar

Throughout this document you will find references to policies, web sites, and other supporting documentation on various CH2M HILL ethics and business conduct policies. The Glossary of Links provided at the end of this document is a one page resource to locate those supporting policies by clicking on the hyperlinks in the list of links. The content of each link is currently only available in English.

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Message from our Chief Executive Officer

Dear employees,

Here at CH2M HILL, we turn challenge into opportunity and lay the foundation for human progress around the world. In all that we do, we uphold our highest ethical standards and core values—serving our clients and the communities where we work and live with distinction and delivery excellence.

CH2M HILL was built on a strong foundation of doing the right thing, and captured in the *Little Yellow Book* are essential values that we hold dearest. As we move forward and continue to grow in an increasingly complex marketplace, we must draw on our past as we look to the future, living each day with the founding values of our company in mind.

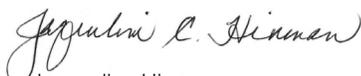
CH2M HILL's *Employee Ethics and Business Conduct Principles* further codify the firm's values and is your guide to how we interact with each other, our customers, our partners, our competitors and our suppliers. As an employee, I ask you to understand and commit to these principles. We owe it to ourselves, our colleagues and the people touched by our work to not only adhere to these ethical principles, but to also seek business partners who live by the same standards as well.

As we work together to solve some of the world's most complex challenges, there will be times when we are faced with difficult ethical dilemmas. It is imperative that we make the right call and conduct our business with the integrity that reflects our heritage and reputation as one of the world's most ethical companies. Live the CH2M HILL Way every day, and stay true to who we are: Respectful, collaborative, entrepreneurial, compassionate and fun.

These *Employee Ethics and Business Conduct Principles* apply to every CH2M HILL employee across the enterprise and are designed to help address issues that may arise from time to time. You will, however, encounter unexpected situations, and I ask that you let our core values and these principles guide the decisions you make. As one of our founders, Jim Howland, said in the *Little Yellow Book*, "A good test to determine if a contemplated action is ethical is to ask, 'Would I want to see it in the headlines tomorrow morning?'"

If you have a question on the best course of action in a difficult situation, or if you become aware of a possible violation of a CH2M HILL policy or a law that governs our business, please get help from your peers, your supervisor or *The GuideLine* (our safe, confidential hotline).

As we move forward, be proud of our achievement as one of the world's most ethical companies, and always remember, "Integrity is the all-important prerequisite to employment. The person must be honest with himself and others or we have no foundation on which to build." – Jim Howland, CH2M HILL Founder.



Jacqueline Hinman,
CH2M HILL Chief Executive Officer



Governing Values:

RESPECT

- Be the most respected company in our industry
- Commit to ethics and integrity
- Strengthen civility in the workplace
- Enhance careers through professional development and advancement opportunities
- Commit to sustainable business practices

DELIVERY EXCELLENCE

- Lead our industry in safety, health, and quality
- Think like our clients
- Apply the best resources to our clients' projects
- Achieve market leadership in delivery of all services
- Minimize bureaucracy
- Manage risk, not avoid it
- Improve business performance

EMPLOYEE CONTROL

- Build long-term stability
- Control our destiny
- Foster a sense of pride
- Reinvest profits in growing markets, projects, and people

Acknowledgement and Certification of Your Commitment to CH2M HILL's Employee Ethics & Business Conduct Principles

Please review this statement of acknowledgement and certification and sign it (electronically or in hard copy, as directed) after you have reviewed the entire document.

I understand that as a CH2M HILL employee I must embrace our Employee Ethics & Business Conduct Principles. These principles support and promote CH2M HILL's way of doing business and protect our employees, client relationships, financial integrity, public image, and shareholder value. As a condition of my employment with CH2M HILL, I agree to abide by these important and sustaining rules of conduct and confirm as follows:

1. I Understand and Endorse the Employee Ethics & Business Conduct Principles and Related Policies

It is my responsibility to be familiar with CH2M HILL's *Employee Ethics & Business Conduct Principles*, including all policies and procedures referenced in the principles, and to understand my obligations as outlined in this document.

I confirm that these *Employee Ethics & Business Conduct Principles* cover, among other things, our policies and expected conduct with respect to: ethical decision making; diversity; freedom from discrimination, harassment, and disrespectful behavior; health and safety; alcohol and substance abuse; violence in the workplace; conflicts of interest; corruption and entertainment; political and lobbying activities; rules for relationships with our competitors and suppliers; obligation to protect CH2M HILL assets; confidentiality of our and our customers' proprietary information; use of communication tools and technology (including social media); fair dealings obligations; fair treatment of labor; accurate record and time keeping; accurate financial reporting; insider trading; protection of personal information; and special requirements when doing work for U.S. Government clients.

I acknowledge that I have received, read, understand, and agree to these *Employee Ethics & Business Conduct Principles* without limitation. I also understand that I have the responsibility to periodically review and comply with other CH2M HILL policies and procedures that apply to my job and responsibilities at CH2M HILL. I confirm that I have access to these documents through CH2M HILL's Intranet, and if I would like a hard copy, I know that I can ask Human Resources for one.

2. I Understand and Endorse CH2M HILL's Policy Against Corruption

I understand that CH2M HILL has zero tolerance for corruption in our business practices. I understand that CH2M HILL does not directly or through others pay or facilitate bribes or provide anything of value to our supply chain or client representatives, including our government officials, to secure new or retain existing business opportunities. I have read and understand CH2M HILL policies dealing with corruption, and gifts and entertainment and agree to abide by them. I understand CH2M HILL rules on dealing with our supply chain and agree to abide by them.

3. I Have an Obligation to Report Violations

I agree to report any actual or suspected violations of these *Employee Ethics & Business Conduct Principles*, CH2M HILL's policies, laws, and/or regulations of any jurisdiction where I work. I understand that *The GuideLine* (CH2M HILL's internal hot line) is a safe and confidential way to report these violations. I know how to contact *The GuideLine*, (either by phone or through the Internet). I also understand that employees who report violations, in good faith, will be protected against any retaliation. I understand that CH2M HILL will only use *The GuideLine* in a manner consistent with laws that apply to me and to CH2M HILL.

4. I Understand and Accept the Consequences of Violating these Principles

I understand that a violation of the policies and ethical standards outlined in our *Employee Ethics & Business Conduct Principles* will subject me to disciplinary action up to and including termination of employment. I understand and agree that these *Employee Ethics & Business Conduct Principles* do not, nor are they intended to, confer any rights or benefits of employment, or constitute an assurance of continued employment or a change in employment status.

Signature _____ Date _____

Printed Name _____

Global Employee Number _____ Office Location _____

Last modified: April 2014

To report concerns or seek guidance about any issues raised here, contact *The GuideLine* at +1-866-924-4843 (U.S. and Canada), +1-720-286-4843 (outside North America) or online at www.reportlineweb.com/ch2mhill (which has international toll free numbers available).

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I. Responsibilities of CH2M HILL Leaders

“ ...the Staff's perception of its leaders is a major factor in motivating and holding strong people. Even though many may never have met the top people, if their perception is that the leaders are honest, intelligent humans working like mad to advance the company and those in it, the rank and file will respond in kind . . . A strong aspect of Leadership is example. ”

— Jim Howland, *Little Yellow Book*

Our leaders foster a strong and sustainable culture of ethics, compliance, respect, and professional excellence. They create a work environment where employees aspire to the highest ethical and professional standards, and where employees are comfortable challenging questionable conduct. Our leaders address allegations of wrongdoing promptly through timely and thorough investigations, corrective actions, training, and fair discipline. They make sure that there is no retaliation against those who, in good faith, report issues and concerns.

Our leaders lead by example. They make ethics and compliance a part of ongoing dialogue at CH2M HILL, not only with employees but also with customers, suppliers, and business partners. They set the right tone and right expectations by consistently focusing on and promoting the importance of ethics as an integral part of the CH2M HILL Way. They never compromise CH2M HILL's ethical standards, and they protect and preserve our most important asset—our reputation—by modeling ethical decision making every day, and expecting the same commitment to ethics from their teams.

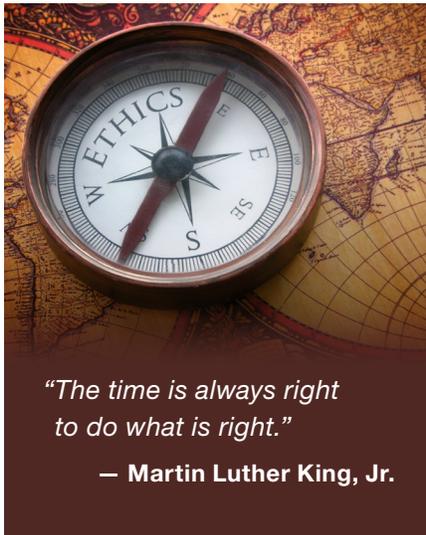
Our leaders believe, and empirical data supports, that ethical companies outperform unethical companies in every business where CH2M HILL works. Our leaders believe being ethical and doing business with integrity is good for CH2M HILL, good for our business, good for our customers, and good for our employees.



II. Do the Right Thing/Make the Right Call

“ Integrity is the all-important prerequisite to employment. The person must be honest with himself and others or we have no foundation on which to build. ”

— Jim Howland, *Little Yellow Book*



Ethical Decision Making

In today's complex business environment, you may, from time to time, encounter an ethical dilemma. If you are unsure of the right course of action, ask yourself the following questions:

- Is my conduct ethical?
- Does it comply with our *Employee Ethics & Business Conduct Principles* and other CH2M HILL policies?
- Does it comply with the law?
- Does it feel right?

If your answer to any of these questions is anything other than a resounding “yes,” do not take the action. If you are still in doubt, seek guidance by contacting *The GuideLine*, by phone or on the web at www.reportlineweb.com/ch2mhill

Seeking Guidance about and Reporting Potential Ethics Violations

We have a duty to CH2M HILL and our fellow employee-shareholders to report known or suspected violations of our *Employee Ethics & Business Conduct Principles*, CH2M HILL's policies, or law. If you suspect or are aware of misconduct, or if you have a question about what is the right thing to do, contact any of the following resources:

- Your supervisor, if not directly involved in the issue
- Your OneHR Delivery Partner
- *The GuideLine* by phone or on the web at www.reportlineweb.com/ch2mhill
- CH2M HILL's Chief Legal and Ethics Officer
- Any member of the [CH2M HILL Legal Department](#)

The GuideLine is our confidential hotline for seeking guidance, asking questions, raising concerns, or reporting potential violations of our *Employee Ethics & Business Conduct Principles*, CH2M HILL's policies, or laws.

You may contact *The GuideLine* via phone by calling +1-866-924-4843 (+1-TO-MY-CH-GUIDE) within the U.S. or Canada, +1-720-286-4843 or by using [MySafeWorkplace](#) to access a list of available international toll free numbers outside the U.S. or Canada, or via the internet at www.reportlineweb.com/ch2mhill, a web-based tool that allows you to report suspected violations or ask questions about a myriad of ethics and compliance issues, and is available in several languages.

Key Point:
CH2M HILL's confidential hotline, *The GuideLine*, can be accessed anonymously by phone or on the web.

If you are asked to participate in an investigation of any ethics or business conduct issue, CH2M HILL expects you to cooperate in good faith and will protect you from any retaliation. CH2M HILL needs and expects your help to protect our company values and reputation.

Reporting Concerns about Financial Reporting

CH2M HILL is a publicly registered company and we report our financial performance to our shareholders and other stakeholders accurately and timely. The accuracy of our financial reporting depends on you and how you record your time, manage change orders, and report project estimates, sales, and expenses. Our senior executives and those responsible for our financial reporting are required to sign our [Ethics Code for Senior Executives and Financial Officers](#), which imposes strict obligations to ensure that CH2M HILL properly tracks and reports our financial performance. We encourage employees to report any questionable accounting or auditing practices, which they can do anonymously and without fear of retaliation. If you have any concerns or questions about our accounting compliance or our financial reporting, you have an obligation to report it immediately to any one of the following:

- *The GuideLine* (our confidential hotline)
- The Chief Legal and Ethics Officer, if not involved in the issue
- The Chief Financial Officer, if not involved in the issue
- The Chair of the Audit Committee of the CH2M HILL Board of Directors

CH2M HILL does not retaliate against those who raise accounting or financial reporting concerns in good faith.

Reporting Concerns about Violations Involving our U.S. Government Work

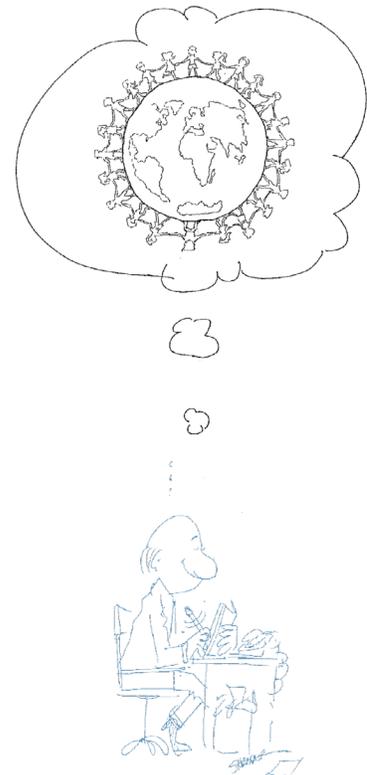
As a contractor to the U.S. Government, we are subject to a number of regulations that mandate how, when, and to whom concerns about our work for the US Government clients should be reported. We promptly disclose if we have credible evidence that we violated laws or received overpayment in connection with our U.S. Government work. If you have information that you believe should be disclosed or have concerns about how CH2M HILL uses U.S. Government resources on any of our U.S. Government contracts, contact *The GuideLine*. Many U.S. Government agencies have their own hotlines that you can also use to report violations.

Discipline

Conduct determined to be in violation of our *Employee Ethics & Business Conduct Principles*, our *Ethics Code for Senior Executives and Financial Officers*, CH2M HILL's policies, or the law will subject those involved to disciplinary actions, including termination of employment. If appropriate, we will report misconduct to the proper authorities, which may lead to civil liability and/or criminal prosecution.

Key Point:

CH2M HILL does not retaliate against those who report concerns about violations in good faith, or have questions about our practices.



Protection for Whistle-Blowers

The U.S. and many other governments around the world provide special protections to those who report violations of government procurement regulations (like U.S. Federal Acquisition Regulations) or any other laws or regulations that govern government work. If you have concerns about how CH2M HILL uses U.S. Government or other governments' resources, contact *The GuideLine*.

III. Respect for Each Other

“ In order to advance each other and CH2M HILL, we must take it upon ourselves to treat one another with respect and wholeheartedly support our colleagues' efforts. ”

— Jim Howland, *Little Yellow Book*



Key Point:

We are a geographically and culturally diverse company. We embrace and accept local cultures and customs in countries where we work, except when these customs are contrary to our core values. Discrimination and harassment has no place at CH2M HILL.

Diversity and Inclusion

CH2M HILL maintains a workforce that is as diverse as the customers we serve. Each of us must do our part by promoting an inclusive work environment that capitalizes on our different talents, optimizes our collective strengths, and minimizes our individual weaknesses. By virtue of our diversity, we achieve together what we cannot do individually.

Non-Discrimination

Discrimination has no place at CH2M HILL. Our commitment to a diverse workforce means that we must work together to eradicate and prevent discrimination. At CH2M HILL we do not tolerate discrimination or unequal treatment of any person or group because of certain characteristics such as: race, color of skin, national origin, age, religion, gender, gender identity, sexual orientation, disability, or any other status protected by law. For additional information about CH2M HILL's policies on this important issue, see our [Equal Employment Opportunity and Affirmative Action Policy](#) and our [Disabilities and Accommodation Policy](#).

Anti-Harassment

CH2M HILL prohibits all forms of harassment. Conduct that creates an intimidating, hostile, abusive, or offensive work environment is unwelcome regardless of whether it is acceptable within local norms, legal under the local law, or is acceptable in a country where we are working. What may be common behavior in certain countries because of local customs may still be a prohibited conduct for CH2M HILL employees because it is not consistent with our company values and policies.

In determining whether conduct constitutes harassment, CH2M HILL focuses on the effect of the action, not the intent of the action. For additional information, see our [Anti-Harassment and Non-Discrimination Policy](#).

If you know or suspect that discriminatory or harassing behavior is taking place, report the situation immediately by contacting a supervisor you trust, your OneHR Delivery Partner, or *The GuideLine*. You will not experience retaliation for making a good faith report.



■ What if?

Q: Amari's supervisor often makes inappropriate remarks about her appearance when he thinks she is out of earshot. He is making her time at work miserable. Since Amari is working at a project site that has few female employees, she is concerned that if she complains, she will be seen as "difficult." What should she do?

A: Amari should report her supervisor's inappropriate behavior. CH2M HILL's policy against harassment applies no matter where Amari works, regardless of her country of origin or citizenship. Her supervisor's behavior constitutes harassment, and it is therefore a violation of our *Employee Ethics & Business Conduct Principles*. CH2M HILL will not allow retaliation to occur as a result of her report.

“ We need to be interested in pleasant people of unimpeachable character and strong capabilities wherever we can find them. ”

— Jim Howland, *Little Yellow Book*

Disrespectful Behavior

We make every effort to attract and retain smart, accomplished, professional, talented, and pleasant people for our employee-friendly work environment. At CH2M HILL, we are focused on teamwork, expertise, capabilities, and long-term potential, not simply on impressive credentials unsupported by strong personal character.

If you are boorish, belittling, condescending, demeaning; if you are unreasonably difficult and unpleasant; if you misuse your management authority to bully or intimidate others and ignore our core values, you have no place at CH2M HILL. Even when you deliver revenue and help capture important projects, if your behavior alienates other talented contributors and creates an unhealthy work environment, you have no place at CH2M HILL. While your abusive behavior may not technically violate laws or our anti-discrimination or anti-harassment policies, it is contrary to our collaborative team environment, and CH2M HILL can terminate your employment for disrespectful and unprofessional conduct.

Key Point:

At CH2M HILL we are focused on a person's character, professionalism, and ethics. We seek to hire the most talented, qualified people in our industry, whose conduct makes CH2M HILL proud.

■ What if?

Q: Sergei, a senior project manager, regularly insults his subordinates. He is never pleased and seems to be angry about something all the time. He is an "equal opportunity" abuser and does not target any particular group with his abusive behavior. Strong performers ask to be transferred from his group or quit to avoid Sergei's disrespectful behavior. Steve reached out to Sergei to discuss the difficult interpersonal environment on the project; Steve likes his project assignment, but is at the end of his rope. Sergei is not receptive and tells Steve to "suck it up" or he will be fired because "management likes me – I get results." What is Steve to do?

A: Steve should contact his OneHR Delivery Partner and talk to the leadership of his group. Sergei's behavior is not consistent with CH2M HILL's culture, and Sergei's disrespect of subordinates will not be tolerated. If Steve is concerned about retaliation because he reported Sergei's behavior, he should contact *The GuideLine*.

Open Communication and Goal Alignment

CH2M HILL encourages open dialogue between employees about business processes or problems, individual concerns or the performance of a project team, department or the company as a whole. A critical part of open communication at CH2M HILL is our annual performance and collaborative goal setting process in which managers and their employees set annual performance expectations in an effort to align goals throughout the organization. Developing goals, communicating those goals and meeting performance expectations against those goals are an important aspect of successful management and employment at CH2M HILL and a key part of fostering our environment for open communication and overall performance management.



Health, Safety, and Environment

Our employees' safety and our commitment to the environment are our top priorities. Each of us is committed to CH2M HILL's Target Zero goal, which aims for zero work-related injuries and illnesses, and minimal environmental impact. This requires that we understand and embrace our [Health, Safety, and Environment \(HSE\) Policy](#), consistently follow our [HSE Core Standards](#), and always execute our work, in the office and on project sites, in accordance with our [HSE Standard Operating Procedures \(SOP\)](#). Remember that safety and environmental protection are your responsibility, and CH2M HILL is looking to you to continuously consider and recommend ways to enhance safety and environmental stewardship throughout the company.

CH2M HILL believes that our reputation for safe work environments and strong HSE commitments help us secure business, attract top talent, and retain our exceptional workforce.

If you have questions or concerns regarding HSE at CH2M HILL, speak to your supervisor, HSE manager, or to our HSE Team at +1-720-286-4773. If you have security concerns, reach out to our Security Team at CH2MHILLSecurity@ch2m.com or +1-720-286-3976.



Key Point:

At CH2M HILL, safety is our #1 priority, and everyone's responsibility. If you see a safety violation, report it to your supervisor immediately.

■ What if?

Q: My supervisor and CH2M HILL's management team are very focused on our health and safety statistics. I injured my hand on the job; should I report it? I do not want to embarrass my team or hurt CH2M HILL's reputation for safety. I have insurance coverage for my medical expenses, so why does it matter if I report this as an on-the-job injury?

A: Not reporting a workplace injury is a serious violation of CH2M HILL's HSE policies. We earn our reputation for safety by developing the best health and safety standards in our industry, not by hiding occasional injuries. Knowing about your injury may allow us an opportunity to improve our HSE processes and prevent such injuries in the future. Your failure to report this injury may cause CH2M HILL to violate important safety laws and reporting regulations.

Workplace Injuries and Illnesses

If you are injured on the job, you must immediately notify your supervisor and follow CH2M HILL's [Injury Management/Return to Work \(IMRTW\)](#) protocols. In many locations, you will have immediate access to a nurse who will help you evaluate your injury, get appropriate treatment, and stay in contact with you to monitor your recovery and return to work. If there is an emergency, seek immediate emergency help.

■ What if?

Q: What if the CH2M HILL provided IMRTW nurse/doctor tells me that no medical treatment is required, but I feel that I should go to the doctor?

A: The approach you wish to take regarding your medical care is always your personal decision. You must do what you and your family feel is appropriate under the circumstances. There will be no retaliation because of your decision.

Workplace Violence

As part of our commitment to health and safety, we have zero tolerance for workplace violence. Employees who are violent or make threats of violence in the workplace will be subject to disciplinary action, including termination of employment, and, when appropriate, criminal prosecution. For additional information, see our [Workplace Violence Awareness and Prevention Policy](#).

Drugs and Alcohol

To maintain and protect the health, safety, and well being of our employees, our workplace must be free of drugs and alcohol. Possessing, using, distributing, or selling illegal substances, or consuming alcohol at work or misusing prescriptions or over-the-counter medications, puts our safety at risk. Such behavior is strictly prohibited and is subject to discipline, including termination of employment. If appropriate, we will report misconduct to a law enforcement agency, which may lead to criminal prosecution. Alcohol consumption on CH2M HILL's premises is only permitted during CH2M HILL-sponsored social gatherings. For additional information, see our [Drug Free Workplace Policy](#).

Protection of Personal Information

In today's rapidly evolving electronic information exchange and storage environment, CH2M HILL is committed to employee privacy and the protection of every employee's personal information. We follow reasonable and recommended information security procedures to protect employees' personal information.

In order to provide services to our employees, such as health care coverage, stock ownership, insurance, and retirement benefits, CH2M HILL may occasionally share your personal information with outside vendors. Unless otherwise permitted by law, CH2M HILL obtains your consent before we transfer your personal information to others. For more information, please see CH2M HILL's [Privacy Policies](#).

Key Point:

Report all threats and acts of violence at our workplace or project sites to CH2MHILLSecurity@ch2m.com or +1-720-286-3976.



Use of Our Communication Systems and Technologies

CH2M HILL expects that you will use our communication systems primarily for work-related purposes and will only access appropriate content. You should have no expectation of privacy or confidentiality about any information received or transmitted through CH2M HILL's communication systems, whether or not communications equipment belongs to CH2M HILL. CH2M HILL monitors your use of the Internet and CH2M HILL's communications systems and may access your emails and other data transmissions to the extent allowed by law. CH2M HILL reserves the right to block access to offensive, illegal, and non-business-related Internet sites and to intercept transmission of any inappropriate materials. Attempts to access offensive or illegal content through our systems or through our computers to store such content may result in disciplinary actions, including termination of employment. For additional information, see our [Communication Systems and Technologies Policy](#).

“ Wear clothes that will mark you a professional person. ”

— Clair A. Hill
March 18, 1969

Importance of Professional Appearance

What we do and how we look reflects on the professional image of CH2M HILL. Behaving and dressing in a manner that upholds CH2M HILL's reputation for professional excellence is just one of the ways we demonstrate respect for each other and our company. When making wardrobe choices, always carefully consider safety and cultural expectations for professional dress. Footwear that does not provide adequate protection is also inappropriate. What is and what is not appropriate may vary from country to country, but wherever in the world you work for CH2M HILL your attire must represent us well as a professional organization which our customers trust with their most important and challenging projects.

IV. Respect for CH2M HILL

“ The person closest to the action has the best chance of making the right decision – if the person is properly informed of the firm wide implications. ”

– Jim Howland, *Little Yellow Book*

Conflicts of Interest

Conflicts of interest arise when our personal or financial interests interfere or appear to interfere with our professional judgment and/or objectivity. Conflicts are inevitable in a large company. If something does not feel quite right, chances are it is not and you should ask for guidance. When dealing with conflicts, disclosure is critical. Timely disclosure to all affected parties resolves most conflicts of interest and can avert an embarrassing situation. If a conflict cannot be addressed through disclosure, we will address it through re-assignment of personnel or change how we deliver our work. Always disclose both actual and potential conflicts of interest to your supervisor.

Personal Conflicts of Interest

A personal conflict of interest exists whenever individuals may be influenced by their own personal interests or relationships when making decisions on behalf of CH2M HILL. For example, if an employee has a close relative in another company, the employee has a personal conflict of interest with respect to any decision he may make on behalf of CH2M HILL to do business with the other company.

Organizational Conflicts of Interest

An organizational conflict of interest may arise when CH2M HILL's work for one client conflicts with our relationship with another client. That conflict has the potential to impact CH2M HILL's capacity to render impartial, technically sound, objective assistance and advice, or may result in an unfair competitive advantage. Many of our clients have policies about organizational conflicts of interest, which may be more restrictive than our policies. Many government clients have very prescriptive policies on conflicts of interest and even an inadvertent violation may result in sanctions and reputational damage for CH2M HILL. We should be aware of our customers' policies on conflicts and use them as our guide in determining the best course of action in resolving conflicts.



Key Point:

It is not unethical to have a conflict of interest. How conflicts of interest are resolved is the measure of our ethics.

■ What if?

Q: CH2M HILL is working for a commercial client, doing an environmental remediation project on land to be used for an industrial development. A year later, a different business unit is asked to do an environmental assessment on the same track of land for a different client who is purchasing the land. Can we do the work?

A: This scenario represents an organizational conflict of interest. The conflict should be fully disclosed to both clients. We can do the work as long as our clients do not object.



Key Point:

Even when the actual outcome is not impacted by a conflict of interest, an *appearance* of impropriety can impact our reputation.

Apparent vs. Actual Conflicts of Interest

An apparent conflict of interest can be just as much of a problem as an actual conflict of interest. While we may be perfectly capable of making an unbiased decision, if an appearance of a conflict of interest exists to those outside of CH2M HILL, it may appear that we are not being objective. Such appearance of impropriety can undermine the integrity of the process, just as if a conflict actually existed. An apparent conflict of interest should be taken seriously and resolved as if it were an actual conflict of interest.

What if?

Q: Catherine is a customer representative on a tender selection team for a competitively bid major infrastructure program. She is contacted by an old friend from her prior employer, who works for one of the three shortlisted competitors. The friend is in town for the client presentation and wants to catch up. Can Catherine meet her old friend for a drink after work, if she tells him that they cannot discuss the procurement?

A: Whether or not Catherine shares information about the competitive selection process with her friend, the mere fact that a member of the selection team meets with a member of one of the three competitors outside of the sanctioned selection process creates an appearance of impropriety. Catherine should delay her catch-up meeting until the selection process is completed. She should disclose to her program manager that she has a personal relationship with a member of one of the competitors' teams and that she has been approached by this person during the procurement process.

“ We are large enough to be able to employ more than one person from a family, but, like the plague, avoid one working for the other. ”

— Jim Howland, *Little Yellow Book*



Key Point:

Be aware that many of our customers have very specific conflict of interest requirements, which should always be followed.

Doing Business with Employees, Friends, and Family

When a personal or family relationship exists between employees working together, it may create tension in the workplace and may appear as though some employees are receiving preferential treatment. No family member should be in a position where he or she has decision-making authority over another family member. A family member includes a spouse or domestic partner, parent, child, sibling, or anyone who resides in the employee's home.

As a general rule CH2M HILL does not do business with employees or members of their immediate family. A conflict of interest exists if you, a member of your family, or close friend has a personal stake in a company that is a supplier to, or a customer of CH2M HILL. Please notify your supervisor if you become aware of an existing or pending business transaction between CH2M HILL and a party directly or indirectly related to you or another employee. If you are directly involved in the supplier selection process, notify your supervisor immediately and remove yourself from the decision-making role.

■ What if?

- Q:** Can Isabella hire her friend to coordinate a CH2M HILL holiday party? Three event planners submitted a bid for this job and the friend's bid appears to be the most competitive. Since the supplier is Isabella's friend, Isabella knows that the supplier will do a great job.
- A:** To avoid even the appearance of a conflict of interest, Isabella should notify her supervisor and have somebody else evaluate the event planning bids and make the final selection.

Corporate Opportunities

You may learn about business opportunities through your work at CH2M HILL. Benefiting personally from such opportunities, or using CH2M HILL's information or name to benefit in other ways creates an unacceptable conflict of interest. You must not engage in any activity that compromises, or appears to compromise, your commitment to act in CH2M HILL's best interest. If you become aware of an opportunity that may benefit CH2M HILL, let the company know about it. You may disclose such business opportunities to others or take advantage of them yourself only if CH2M HILL has no objections.

Outside Employment

Accepting employment outside of CH2M HILL may at times create a conflict of interest. To avoid such potential conflicts, employees should not accept a job outside of CH2M HILL or run a business that may interfere with their work at CH2M HILL. Before accepting any employment or business commitment outside of CH2M HILL, consult with your supervisor and receive prior written approval. Employees with outside jobs or businesses must continue to meet performance standards of their CH2M HILL positions and may not conduct outside business during regular working hours or do so using CH2M HILL's property, equipment, or information. Employees may not accept supplementary employment or have a business partnership with our suppliers, customers, or competitors.

Serving on a Board of Directors

Serving on a board of directors outside of CH2M HILL may interfere with your work for the company. To avoid potential conflicts of interest, serving on the board of directors for any organization (whether or not such service is compensated, whether or not the organization does business with CH2M HILL, and whether or not it is for-profit) requires advance written approval. You should discuss the opportunity with your supervisor and, if approved, contact CH2M HILL's Chief Legal and Ethics Officer for further guidance, before accepting the appointment. Employees may not serve on a board of directors for a company that competes with, supplies goods or services to, or purchases services from CH2M HILL.

Key Point:
Your work for non-profit organizations benefits our communities and profession, but it can also create conflicts with customers. Keep CH2M HILL informed about your non-profit activities so we can anticipate conflicts.

**Key Point:**

It is against CH2M HILL policy to accept or offer gifts to or from our suppliers and clients. There are narrow exceptions to this general rule, and they are always subject to strict review.

Gifts and Entertainment

Business gifts and entertainment are courtesies designed to build working relationships with our suppliers and customers. When offering, providing or receiving gifts, entertainment, meals, or anything of value, we should be guided by good judgment, discretion, moderation, and transparency. Giving or receiving anything of value is not appropriate if it creates an obligation, puts you in a situation where CH2M HILL appears biased, or influences our business decisions. It is CH2M HILL's policy that employees will not solicit or accept any gifts, favors, loans, gratuities, rewards, promises of future employment, or any other things of value, including travel and lodging. It is also our policy that we do not offer gifts or entertainment to clients to influence their business decisions.

■ What if?

Q: Nigel serves as a procurement manager for CH2M HILL. A software supplier recently sent Nigel a letter requesting a meeting to discuss new software. The supplier offered to demonstrate the new product on the latest generation iPad, which Nigel could keep afterwards for personal use. The supplier clarified that accepting this demo would not obligate Nigel in any way to purchase the software. May Nigel accept?

A: This gift is not of a nominal value and is offered (despite claims to the contrary) with the expectation that it would influence a business decision. Nigel cannot accept the offer, should politely decline, but can meet with the supplier to discuss the new software. He should also report this overture to his supervisor.

**Key Point:**

Accepting travel or lodging from business associates is against CH2M HILL policy and rare and narrow exceptions to this rule require written approval.

Accepting or offering gifts or entertainment is generally discouraged and is permissible only in rare circumstances when gifts or entertainment are:

- Nominal in value
- Not prohibited under the contract or by relevant regulations
- Infrequent, in good taste, and unsolicited
- Not cash or a cash equivalent (e.g., gift cards)
- Special occasions when gifting is customary and to do otherwise may be deemed inappropriate (for example, retirement celebration or Chinese New Year).

When accepting or providing a nominal gift or modest entertainment, always follow [CH2M HILL's Gifts and Entertainment Policy](#) and record it on our [Gifts and Entertainment Register](#).

■ What if?

Q: One of our important suppliers offered Ahmad an all-expenses paid trip to an international golf tournament it is sponsoring. Ahmad will have the opportunity to meet and network with the supplier's senior management team. Such "access" will be good for our business. Can Ahmad accept?

A: This offer and its expense appear lavish and do not fit within our policy. Ahmad should consider other ways to meet the supplier's management team. If he strongly believes that attending the tournament is important for the relationship, prior written approval from his supervisor is required to attend the tournament and CH2M HILL should cover the cost of Ahmad's travel and lodging.