

Our Supply Chain

Our supply chain consists of suppliers of equipment, materials, and other purchased goods; agents; contractors; subcontractors who provide construction, consulting, technical and professional services; and companies that we partner with on a joint-venture or consortium basis (collectively referred to as “Supply Chain”).

Your Business Practices

CH2M HILL stakes its reputation on delivering projects that create value for our customers and make the world a better place to live. Maintaining this reputation requires that we excel in service to our customers, while upholding CH2M HILL’s ethical standards. The same standards apply to all those who work with us and on our behalf.

We have created these *Supply Chain Ethics & Business Conduct Principles* to help guide you and your staff when complex ethical issues arise. These Principles help us work toward our common goal—unwavering commitment to ethical business practices and compliance with laws. While some business practices reflected in these Principles may not be customary in your country, when working on our projects we require that you comply with these Principles because they are fundamental to how we do business.

CH2M HILL relies on our Supply Chain to choose subcontractors and suppliers that share our values as reflected in these Principles. We expect you to ensure that those you use for work on our projects

conduct business legally, ethically and in accordance with all expectations expressed here.

Health, Safety, and Environment (HSE)

Protection of people and the environment is a CH2M HILL core value. We are committed to the health and safety of our people and communities where we work, and we expect the same of our Supply Chain. When working with us you must be committed to the health and safety of your staff and take all necessary steps to provide a safe working environment for your employees and contractors. You must also take every precaution to protect the environment and the well being of the communities where you work.

Sustainability

We have a strong commitment to sustainable development and the environment. Our projects provide long-term sustainable solutions for our customers and preserve our planet’s natural resources for future generations.

CH2M HILL is committed to limiting our environmental impact and we look to our Supply Chain to do the same. We evaluate your environmental stewardship reputation and performance history before we agree to do business with you.

Conflicts of Interest

CH2M HILL expects that members of our Supply Chain make their business decisions in the best interest of CH2M HILL, our customers and our projects. When working for us, you need to be keenly aware of organisational



and personal conflicts of interest that may impact your work or our customers. Any situation that creates or appears to create a conflict should be avoided. If unavoidable, it must be promptly disclosed to us and properly managed. Conflicts of interest, unless correctly handled, may cause us and you to be disqualified from a business opportunity and may embarrass our customers.

Gifts and Entertainment

Every member of our Supply Chain should have in place a thoughtful policy on gifts and entertainment practices. This policy should be widely communicated and enforced in your organisation.

Be aware that, generally, CH2M HILL employees are not permitted to accept or provide gifts or entertainment to influence a business decision or to obtain or retain business. Cash and cash equivalents (such as gift cards) are strictly prohibited.

The only narrow exceptions to these intentionally broad prohibitions are infrequent and unsolicited, non-cash gifts of nominal value and modest entertainment aimed at buttressing

working relationships between us. This narrow exception does not apply when prohibited by contract or law.

Corruption

Those who work with us must know about and comply with our anti-corruption policy and the procurement integrity laws in effect everywhere we do business, including the U.S. Foreign Corrupt Practices Act (FCPA), the U.K. Anti-Bribery Act and the Organisation for Economic Cooperation & Development (OECD) Convention on Combating Bribery of Foreign Public Officials in International Business Transactions.

When working with CH2M HILL, you are strictly prohibited from offering, giving, or accepting any form of a bribe, kickback, gift, or benefit designed to influence a business decision. This prohibition extends to payments and gifts in cash or in-kind, made directly or through others.

Beware that bribe solicitations do not always come as a straightforward cash demand. They can come in forms as sophisticated and complex as the projects that we deliver. Providing lavish entertainment, travel and

accommodations; directing business to a company owned by a procurement official; offering employment opportunities to family members of customer representatives; supporting charities sponsored by government officials or their relatives are all examples of corrupt and prohibited activities. Simply put, no gift or payment should be made or accepted to influence business decisions on CH2M HILL's behalf or in connection with our projects.

Fair Dealing

CH2M HILL deals honestly and fairly with members of our Supply Chain. We consistently follow our own and our customers' established procurement rules and expect members of our Supply Chain to do the same.

We do not work with suppliers, subcontractors or joint-venture partners that restrict their employees' rights to associate freely with labor organisations.

Trade and Export Controls

CH2M HILL complies with all international trade laws and regulations, including trade sanctions, and we expect members of our Supply Chain to comply with all trade and export control laws that apply to their work.

Beware that export and import laws apply not only to goods but also to technology, software, and technical information. Export laws may be violated by simply

sharing information with foreign nationals without the information ever leaving its country of origin. When working with us, be careful to avoid such "deemed export" and have procedures in place to recognise and avoid it.

Inclusion, Diversity, Harassment

CH2M HILL fosters a diverse work environment and is committed to eliminating discrimination and harassment in the workplace. We choose to partner only with those who as a matter of good business practice, comply with all applicable laws on non-discrimination and anti-harassment in hiring and employment.

Even when certain discriminatory practices are common where you work, as a condition of working for us and our customers, we ask you to endorse practices consistent with our commitment to a discrimination and harassment-free work environment.

Human Rights

We respect and protect the rights of those who work on our projects. We provide reasonable working conditions and fair wages, and expect our Supply Chain to do the same. CH2M HILL has a zero-tolerance policy for the use of child or forced labor and for any other human trafficking practices. We refuse to do business with those who do not share our zero-tolerance stance.

"Let us be flamboyant when it comes to dreaming and thinking; conservative in our personal habits while doing interesting, innovative things inside and outside the firm."

— The Little Yellow Book

Learn more about **The Little Yellow Book** at:
www.ch2mhill.com/ethics



Confidentiality

We protect confidential information that belongs to you and expect you to not disclose our proprietary and confidential information. You may never share our confidential information or sensitive personal information of our employees with a third party without an express written permission.

We expect that you will employ adequate internal controls and information-security measures and for your computer systems, portable electronic devices, laptops and other storage devices to ensure the safety of information that we or our customers entrust to you. This includes taking the necessary precautions in not leaving such information or devices in places where they could be damaged or inappropriately accessed.

When working with us you should not store our or our customers' confidential information to shared data-storage devices that lack adequate protections.

In the event you become aware of a possible data security breach involving our or our customers' information, you must immediately report this breach to us.

Intellectual Property

We expect the members of our Supply Chain to respect our and our customers' intellectual property rights. When working with us, you must take necessary steps to protect our and our customers' trademarks, copyrights, and patents used in your work. If you are unsure about a proposed use of our or our customers' intellectual property, seek our guidance.

Lobbying Activities

Do not, directly or through others, engage in lobbying activities on our behalf or on behalf of our projects, unless you have written authorisation from us to do so. At CH2M HILL, we define "Lobbying" as communication, in any form, with government employees and members of their families, specifically designed to influence government policies, or the award and administration of government contracts.

Marketing Materials and Interactions with the Media

Any marketing materials, press releases, or media interviews that include a reference to CH2M HILL, our customers or our work together must be approved in advance by CH2M HILL.

Communication and Awareness Training

To ensure compliance with our *Supply Chain Ethics & Business Conduct Principles*, you should communicate the content of these Principles (or your equivalent code of conduct) to all those you intend to use on our projects. We expect you to establish an ethics awareness training and monitoring programme. We also expect you periodically to evaluate your compliance with these Principles and to maintain ongoing dialogue with us to foster continuous improvement.

Recordkeeping and Right to Audit

Best practices require that you keep appropriate records in order to demonstrate your compliance with our *Supply Chain Ethics & Business Conduct Principles*. Falsifying financial or business records, or making false statements is against the law and it will irreparably damage your business relationship with CH2M HILL.

We reserve the right to periodically review your business practices to ensure your compliance with these Principles. Members of our Supply Chain are expected to comply with our reasonable inquiries related to your work for us. We expect you to cooperate with our audits and investigations and honestly share relevant information with us.

Reporting Concerns without Retaliation

As a member of our Supply Chain, you have an affirmative obligation to report any credible suspicions you have about possible violations of these Principles or laws, as they relate to your work with us. We will make every effort to safeguard your confidentiality and, wherever allowed by law, your anonymity, if you so desire.

You can ask questions about issues outlined in these Principles, report violations or raise concerns by calling The GuideLine (our hotline) at +1-866-924-4843 (U.S. and Canada), +1-720-286-4843 (elsewhere in the world), or via the web at www.ch2mhill.com/guideline. CH2M HILL will investigate all hotline reports and respond to all questions, and will take prompt corrective actions, when appropriate.

You should feel free to report any suspected violation of the law or our *Supply Chain Ethics & Business Conduct Principles* without fear of retaliation. We expect members of our Supply Chain to take steps to prevent any retaliation against any individual for reporting a possible violation of laws and these Principles in good faith. For clarification, “good faith” does not mean that you have irrefutable evidence of violation or that your report has to be correct. It only means that you genuinely believe it to be true and accurate at the time you make the report.

“The quality of our services is of paramount importance. We must do a much better job than our competition in solving clients’ problems if we are to succeed.”

— The Little Yellow Book

Learn more about **The Little Yellow Book** at:
www.ch2mhill.com/ethics

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APPENDIX 6.6: ANTI-BRIBERY POLICY



Policy Number: 112

Category: Ethics and Business Conduct

Anti-Corruption Policy

Revision: 2

Effective Date: February 27, 2016

Policy Owner: Ethics and Compliance

PURPOSE

To establish CH2M policy regarding compliance with the U.S. Foreign Corrupt Practices Act (“FCPA”), United Kingdom Bribery Act 2010 (“UKBA”) and other applicable anti-corruption laws (together, “Anti-Corruption Laws”).

POLICY

It is the Policy of CH2M to conduct its business operations and activities in compliance with the [FCPA](#), [UKBA](#) and the Anti-Corruption Laws of other countries in which the Company does business.

All [CH2M Personnel](#) (as defined herein) must adhere to this Policy and are not authorized to offer, approve or make payments to, or provide gifts or anything else of value:

- to any [Public Official](#) (as defined below) to induce that official to take any governmental act or make any governmental decision that will assist the Company to gain or retain business, or prevent competitors from gaining or retaining business, or otherwise to create an unfair or illegal advantage for the Company; OR
- to any other person to induce that person to take any act or make any decision that will assist the Company to gain, retain business or prevent competitors from gaining or retaining business, or otherwise to create an unfair or illegal advantage for the company.

Financial Records

An important aspect of compliance with anti-bribery laws is to ensure that any payments made by the company are accurately reported in its books and records. It is the policy of the Company to maintain all financial records in accordance with the U.S. and other internationally accepted accounting principles in such a manner as to accurately and clearly describe the nature and value of any payments or other items of value provided to any Public Official or any other person.

Training

It is the Policy of the Company that all CH2M Personnel complete the Company’s [Ethics and Business Conduct Principles](#) (Policy 101) training (which includes a section on compliance with [Anti-Corruption Laws](#)) at the time of hire, and annually thereafter.

It is also the Policy of the Company that [Exposed CH2M Personnel](#) complete the Company’s Advanced Anti-Corruption Training at the time of hire, upon becoming an Exposed CH2M Personnel or at the time of publication of this Policy and annually thereafter.

Reporting Suspected Violations

It is the Policy of the Company that any **CH2M Personnel** who suspect a violation of this Policy or any CH2M Personnel who have received a report of a suspected violation of this Policy immediately report such suspected violation to the Company's Chief Ethics and Compliance Officer by calling +1 720.286.2667 (toll free), by **email**, or through **The GuideLine**.

ANTI-CORRUPTION LAWS EXPLAINED

Anti-Corruption Laws prohibit people associated with companies from engaging in corrupt activities in all jurisdictions, foreign and domestic (the "anti-bribery provisions"). The **FCPA** additionally requires companies such as CH2M to maintain accurate books and records of their business activities (the "books and records provisions").

The financial and reputational damage from being accused of violating the **FCPA** or **UKBA** or any other Anti-Corruption Laws can be significant because these laws are aggressively enforced. That is why companies like CH2M have policies and provide related guidance on how to comply with **Anti-Corruption Laws**; it's the right thing to do.

ANTI-BRIBERY PROVISIONS

Anti-Corruption Laws generally prohibit businesses and individuals from authorizing, offering to pay or give "Anything of Value" (as defined herein) directly or indirectly to any person for the purpose of influencing, or causing another person to influence, any act or decision by a **Public Official** or government, or by any other person, in order to obtain or retain business or to gain a business advantage.

Actual payment or giving of **Anything of Value** need not be made; merely offering **Anything of Value** can violate these **Anti-Corruption Laws**. Moreover, CH2M will be held responsible for violations of **Anti-Corruption Laws** caused by any person or business acting on behalf of CH2M, such as sub-contractors, consultants and agents.

The prohibited actions listed below describe activities that have the purpose of trying to influence (or cause another person to influence) any act or decision of a **Public Official** or any other person in order to obtain or retain business or gain a business advantage.

Prohibited Actions

CH2M Personnel and any third parties working on the Company's behalf are prohibited from offering, promising, authorizing or giving **Anything of Value**, directly or indirectly, to a **Public Official** for purposes of:

- influencing any act or decision of such **Public Official** in his official capacity;
- inducing such **Public Official** to do or omit to do any act in violation of the lawful duty of such official;
- securing any improper advantage;
- inducing such **Public Official** to use his influence with a government or elsewhere to affect or influence any act or decision in order to assist the Company in obtaining or retaining business for itself, or directing business to any other person.

For example, if a CH2M employee, or anyone representing CH2M offers or agrees to provide travel and/or hospitality to a **Public Official** in the hope or expectation that it would influence the actions of that **Public Official** or any other **Public Official**, it would be a **Prohibited Action**. Even if there were no intent to influence the actions of a **Public Official**, and the offer were made in good faith, the company and the individual making the offer would be exposed to allegations of corrupt practice under **FCPA** or **UKBA**, as it can be very difficult to prove 'no bad intent.'

CH2M Personnel and any third parties working on the Company's behalf are also prohibited from offering, promising, authorizing or giving [Anything of Value](#) directly or indirectly to any person or business, including the personnel of existing or potential vendors, suppliers, customers or competitors in order to obtain or retain business or to gain any commercial advantage.

CH2M Personnel and any third parties working on the Company's behalf may not, directly or indirectly, offer, promise, authorize or give [Anything of Value](#) if they have any reason to suspect that any portion of the payment will be used for any of the purposes described above.

For example, if a CH2M employee, or anyone representing CH2M offers or agrees to provide [Anything of Value](#) to an employee of another company, in return for removing a competitor from a bidding shortlist, CH2M and the individual making the offer would be exposed to allegations of corrupt practice under [UKBA](#).

Facilitating Payments

In the course of conducting its day-to-day business, CH2M may have to make payments to government agencies to secure authorizations, permits, licenses, or pay user fees. Such payments are lawful, so long as they can be verified by reference to officially published tariffs or fee scales.

In some cases, however, employees of government agencies will seek [Facilitating or Expediting Payments](#), which are small in value and are made to expedite or secure the performance of a routine, non-discretionary governmental action that is ordinarily performed by a [Public Official](#). These are considered small bribes that are usually given for the following reasons:

- to obtain performance or to speed up a function to which the payer has legal entitlement and the [Public Official](#) has no discretion such as obtaining the release of goods from customs;
- to induce a [Public Official](#) to perform a function improperly such as the modification of public records, to not act or to overlook a minor violation of a regulation such as incomplete paperwork or the issuance on a noncompliance order; or
- to give preferential treatment such a priority in cargo handling or customs approval.

As a result of the basic nature of facilitating payments, Policy 112 prohibits the payment of [Facilitating or Expediting Payments](#) to a [Public Official](#), other than in circumstances where demands are accompanied by a genuine and immediate threat to life, limb or liberty (which must be reported to the Company's [Ethics and Compliance](#) team as soon as possible) or other highly exceptional circumstances that require the prior written approval of the Company's [Chief Ethics and Compliance Officer](#).

Any approved [Facilitating Payments](#) must be recorded accurately in CH2M's books and records. If the Company's Ethics and Compliance team approves a facilitating or expediting payment, the requesting employee and the [Ethics and Compliance team](#) must notify the appropriate business unit's financial director or other responsible financial officer to ensure that the payment is accurately recorded.

All supporting documentation, including written approvals, must be retained in the appropriate files.

Gifts, Meals, Hospitality and Travel

Policy 112 prohibits the giving of gifts, meals, hospitality, travel, or other business courtesies to a [Public Official](#), other than in exceptional circumstances that meet the requirements of [Policy 105](#) (Gifts, Entertainment, Hospitality and Travel Policy) or that have the prior written approval of the Company's Ethics and Compliance team.

Other than for [Public Officials](#), CH2M permits the giving or accepting of modest gifts, meals, hospitality, travel and other business courtesies to be provided in connection with building business relationships or showing appreciation. However, it is important to avoid even the appearance of improper conduct with our customers, suppliers, vendors, or any others with whom we do business.

Never give, accept, offer, promise or authorize the giving or accepting of the following:

- Cash or cash equivalents (such as American Express, Visa or MasterCard gift cards or gift certificates);
- Gifts, meals, hospitality, travel or other business courtesies that would violate any law or regulation in the territories of either the employee or the recipient or that would influence or create an appearance of influencing the recipient's business decision or judgment;
- Gifts, meals, hospitality, travel or other business courtesies that are lavish, unusual, extravagant or inappropriate.

For any gift, meal, hospitality, travel or other business courtesy to be acceptable, it must have all of the following characteristics:

- it should be provided in connection with a bona fide and legitimate business purpose;
- it should not be motivated by a desire to exert improper influence, or the expectation of reciprocity;
- it should be reasonable and customary under the circumstances;
- it must be permitted or allowed under applicable laws or regulations; and
- it should be tasteful and commensurate with the standards of professional courtesy generally accepted by corporations like CH2M, but should not exceed local cultural and behavioral standards.

All expenses associated with gifts, meals, hospitality, travel or other business courtesies must be recorded accurately and transparently in any request for reimbursement through a Company expense report or otherwise and in CH2M's books and records with sufficient detail and documentation to identify each recipient's name and title, the name and title of each beneficiary of the payment, and the purpose of the expense. For more detailed information, please refer to [Policy 105](#) (Gifts, Entertainment, Hospitality and Travel Policy).

Political and Charitable Contributions

Political contributions may not be made by [CH2M Personnel](#) and any third parties working on the Company's behalf unless they fully comply with this Policy 112, [Policy 104](#) (Political Contributions Policy), [Policy 105](#) (Gifts, Entertainment, Hospitality and Travel Policy) and all applicable laws. This includes payments to political parties, party officials, candidates for political office or individuals known or suspected to be acting on behalf of any of the foregoing persons.

Charitable contributions may also raise corruption issues as they may be perceived as improper and must be analyzed to determine the intent of the person requesting the charitable contribution and his/her relationship with the charity.

All charitable contributions – whether through a cash donation or in-kind services or involving any [Public Official](#) – must fully comply with this Policy 112 and [Policy 105](#) (Gifts, Entertainment, Hospitality and Travel Policy) and must be pre-approved in writing by the CH2M's [Ethics and Compliance team](#).

Political and charitable contributions may only be made after the aforementioned approval is obtained and any request made by an employee for reimbursement through an expense report or otherwise shall be rejected unless evidence of prior approval, as required under the applicable CH2M policies, is submitted with the reimbursement request.

For more detailed information, please refer to [Policy102](#) (Engagement of Business Development Consultants, Commercial Agents, Sponsors, Political Advocates and Lobbyists), [Policy 104](#) (Political Contributions) and [Policy 105](#) (Gifts, Entertainment, Travel and Hospitality Policy).

BOOKS AND RECORDS PROVISIONS

The books and records provisions of the [FCPA](#) require companies governed by the US Securities and Exchange Commission, like CH2M, to properly record all transaction and dispositions of assets and to devise and maintain a system of accounting controls to monitor the execution of company transactions and to ensure the proper recording of all such transactions. These requirements to maintain accurate books and records also extend to the [UKBA](#) and other applicable [Anti-Corruption Laws](#).

These books and records provisions apply not only to the US operations of CH2M, but also to all of CH2M's subsidiaries and affiliates, wherever they are located. In order to comply with the books and records provisions of the [FCPA](#) and other applicable [Anti-Corruption Laws](#), CH2M must maintain (i) adequate internal accounting standards and controls and (ii) adequate books and records.

The books and records must, in reasonable detail, accurately and fairly reflect all of the Company's transactions. Accordingly, all transactions must:

- be executed in accordance with management's authorization (as defined in our policies and procedures);
- be transparent containing documentation that clearly supports each transaction and includes a detailed description of the business purpose (examples of documentation include vendor receipts, itemized credit card receipts, supplier invoices or a list of attendees or recipients);
- be recorded in a manner that permits the preparation of financial statements in accordance with applicable standards (notably Generally Accepted Accounting Principles);
- maintain accountability of assets; and
- be recorded in accounts that are reconciled to underlying detail at reasonable intervals

None of these statements is intended to supersede existing CH2M accounting policies.

CORRUPTION RED FLAGS

The following are examples of 'Red Flags' that should raise concerns about possible corrupt activities that could violate the Anti-Corruption Laws. Any employee who becomes aware of one or more of the following Red Flags' in connection with an actual or potential transaction must immediately notify the [Ethics and Compliance team](#).

Red Flags for Corrupt Business Practices

- Requests for payments to a numbered account
- Requests for payments to be made:
 - in a country other than the country where services are to be performed, or
 - in cash, or
 - in a currency other than that used in the country where the services are to be performed, or where the intended recipient is legally based
- Unusually high fees, commissions, or retainers

- History of corruption in the country
- Questionable reputation of, or known concerns about an agent, consultant, or subcontractor
- An agent, consultant or subcontractor refuses to complete agent/ consultant/third-party questionnaire regarding relationship with or interests involving foreign government officials or to cooperate in related due diligence enquiries
- Refusal by an agent, consultant or subcontractor to agree in writing that it will not engage in corrupt payments and to accept that a violation of such obligation constitutes grounds for termination of the relationship for default
- Lack of transparency in financial records
- Inflated or unusual invoices
- Relationships between an agent, consultant, or subcontractor and [Public Officials](#)
- Apparent lack of qualifications or resources on the part of the agent, consultant, or subcontractor
- Recommendations from a [Public Official](#) regarding use of the proposed agent, consultant, or subcontractor
- Breakup of a company or association with one or more foreign companies is unexplained or inadequately explained
- Heavy reliance by a party on political or government contacts as opposed to knowledgeable staff and investment of time to promote the Company's interests
- A desire to keep third-party representation secret

Red Flags for Books and Records and Accounting Violations under FCPA and Other Applicable Legislation

- Vague, non-specific description for payments made in entries
- Documents conceal the true identify of an in-country representative or agent
- Payment descriptions that do not correspond to the appropriate account
- General purpose or miscellaneous accounts that can be used to hide improper payments
- Over-invoicing or false invoices
- Unrecorded accounts or transactions
- Travel and expense forms with incomplete information that are used to obtain cash for improper payments
- Submission of false or inaccurate expense account reports
- Misstatement of transactions, e.g., recording a payment to the wrong payee

HOST COUNTRY LAWS

Many countries, including the European Union countries, have adopted the Organization for Economic Cooperation and Development's Convention on Combating Bribery of Foreign Public Officials in International Business Transactions and, as a result, have adopted laws similar to the [FCPA](#) and [UKBA](#). Other countries, such as the United Arab Emirates, have signed the United Nations Convention Against Corruption and have also

adopted anti-bribery laws. CH2M and [CH2M Personnel](#) will adhere to the requirements of any such laws where they apply to our operations.

DUE DILIGENCE ON CH2M'S BUSINESS PARTNERS

In every transaction that involves a third-party business partner or includes other circumstances where there may be a concern about compliance with any [Anti-Corruption Law](#), the Company must demonstrate and ensure through appropriate due diligence that the business partner is a legitimate and trustworthy enterprise or individual that will comply with all applicable [Anti-Corruption Laws](#) and that any potential corrupt practice concerns are properly reviewed.

These due diligence reviews should be proportionate to the risk of potential corrupt practice, should be conducted before entering into any business agreement, should be repeated and, where necessary, supplemented in the event a relevant concern is subsequently raised about any business partners.

Business Development Consultants, Commercial Agents, Sponsors, Political Advocates and Lobbyists

Without exception, any business development consultant, commercial agent, sponsor, political advocate or lobbyist engaged by or working on behalf of CH2M must have a written agreement with the Company before work begins or payments can be made. Agreements require the inclusion of the [Anti-Corruption Contract Language for Third Party Contracts](#).

All business development consultants, commercial agents, sponsors, political advocates or lobbyists must be reviewed and approved in accordance with [Policy 102](#) (Engagement of Business Development Consultants, Commercial Agents, Sponsors, Political Advocates and Lobbyists).

Any agent, sponsor, consultant or other third-party representative of CH2M must certify their compliance with the Company's policies and procedures related to compliance with applicable [Anti-Corruption Laws](#).

Appropriate anti-corruption compliance assistance and training will be provided by the Company to any agent, sponsor, consultant or other third-party representative of CH2M and the directors, officers and employees of such parties as necessary.

Joint Venture Partners

CH2M may be held liable for corrupt activities conducted by joint venture entities. All joint venture entities that are majority-owned or otherwise controlled by the Company must comply with this Policy 112. Joint venture entities that are not majority-owned or controlled by the Company, must implement Policy 112 or an equivalent policy that is no less stringent.

In connection with the Company's majority-owned or controlled joint ventures, CH2M's joint venture partners must annually certify their compliance with the Company's policies and procedures related to compliance with applicable [Anti-Corruption Laws](#).

All joint ventures must be reviewed and approved in accordance with [Policy 305](#) (Joint Ventures Policy).

Vendors, Contractors, Subcontractors, Suppliers, Consultants and Others

Without exception, all vendors, contractors, subcontractors, suppliers, consultants and other third-party representatives engaged by or working on behalf of CH2M that are not covered under [Policy 102](#) (Engagement of Business Development Consultants, Commercial Agents, Sponsors, Political Advocates and Lobbyists) or [Policy](#)

[305](#) (Joint Ventures Policy) must be reviewed and approved through the Company's due diligence procedures before payments can be made.

All written agreements with vendors, contractors, subcontractors, suppliers, consultants and other third-party representatives must include the [Anti-Corruption Contract Language for Third Party Contracts](#). Vendors, contractors, subcontractors, suppliers, consultants and other third-party representatives may also be required from time to time to certify their compliance with the Company's policies and procedures related to compliance with applicable [Anti-Corruption Laws](#).

Appropriate anti-corruption compliance assistance and training may be provided by the Company as necessary.

Mergers and Acquisitions

Without exception, all companies, entities or other parties whom the Company seeks to acquire through a merger or acquisition must undergo appropriate due diligence based on the risks presented. The Company's [Chief Ethics and Compliance Officer](#) must supervise, review and approve any due diligence performed on any potential merger or acquisition target.

Clients

Without exception, all clients with whom the Company contracts to perform services or goods or otherwise to do business must undergo appropriate due diligence based on the risks presented.

CORRUPTION RISK MITIGATION PLANS

Projects that will deliver goods or services in countries or geographies identified by [Transparency International](#) as having an "Extreme" or "High" risk for corruption must undergo review by the [Ethics and Compliance team](#) to determine whether the Company should implement a Corruption Risk Mitigation Plan for the project. The list of countries with an "Extreme" or "High" risk of corruption may be found on the Virtual Office (VO) under the Operations | Enterprise Security | [Country/Area Risk/Threat Ratings](#) . Please consult the [Corruption Risk Mitigation Plan Guidelines](#) for further details on how to request a review for a specific project or contact the Ethics and Compliance team directly by telephone at +1 720.286.2667, by [email](#), or through [The GuideLine](#) with any questions.

TRAINING

The anti-corruption training program provides specific instruction to [Exposed CH2M Personnel](#) that is appropriate to the needs and risks related to the employee's assignment. It is delivered through web based tools, in groups, or one-on-one sessions. Managers who hire an employee into an [Exposed CH2M Personnel](#) role are responsible for working with the CH2M Talent Management and Development Department to schedule that employee for anti-corruption training. Managers are also responsible for ensuring that [Exposed CH2M Personnel](#) under their supervision comply with Policy 112.

Exposed [CH2M Personnel](#) are responsible for understanding applicable [Anti-Corruption Laws](#), for complying with these laws, and for reporting immediately any suspected violation.

CERTIFICATIONS

Exposed [CH2M Personnel](#) and any agent, sponsor, consultant or other third-party representative of CH2M falling under [Policy 102](#) (Engagement of Business Development Consultants, Commercial Agents, Sponsors, Political Advocates and Lobbyists) must from time to time certify in writing that they have received and understand the

Company's policies and procedures related to [Anti-Corruption Laws](#) compliance; that they have acted in compliance with and will continue to comply with such policies and procedures; that they are not aware of any violations of these policies and procedures; and that they will report any violations or concerns in the future. Managers will direct any issues raised by such certifications or refusal to execute and submit a certification in a timely manner to the [Ethics and Compliance team](#).

AUDIT

The Company's Internal Audit Department and [Ethics and Compliance team](#) periodically audit compliance with this Policy or as requested by the Company's General Counsel or the Audit Committee of the CH2M Board of Directors.

REQUESTS BY PUBLIC OFFICIALS

Any request for CH2M, [CH2M Personnel](#) or any third parties acting on behalf of CH2M to transfer [Anything of Value](#) to a [Public Official](#) must immediately be reported to the Company's [Ethics and Compliance team](#) directly by telephone at +1 720.286.2667, by [email](#), or through [The GuideLine](#).

QUESTIONS OR REPORTING SUSPECTED VIOLATIONS:

Please submit any questions or any observed potential illegal or unethical behavior believed to violate Policy 112 or related procedures (which must be reported) to the Company's Ethics and Compliance team directly by telephone at +1 720.286.2667, by [email](#), or through [The GuideLine](#).

Reports of misconduct will be investigated and employee cooperation with investigations is required. Failure to report a violation of Policy 112 will be treated as a violation of Policy 112. Retaliation against anyone who reports an actual or potential violation of Policy 112 in good faith is prohibited and will not be tolerated.

No one will be reprimanded, or otherwise punished, for raising legitimate questions related to any transaction – we encourage this interest in the wellbeing of CH2M.

DEFINITIONS

- **Anti-Corruption Laws** means the FCPA, UKBA and similar anti-corruption laws.
- **Anything of Value** should be broadly construed and includes not only cash or a cash equivalent, but also discounts, gifts, use of materials, facilities or equipment; entertainment, drinks or other hospitality; meals, transportation, lodging, insurance benefits, investment opportunities, political or charitable contributions, or promise of future employment. The perception of the recipient and the subjective valuation of the thing conveyed is a key factor considered in determining whether "anything of value" has been offered, promised or given.
- **Business Partner** means any third-party company, limited liability entity, partnership, other legal entity or individual with whom CH2M contracts, transacts or otherwise does business.
- **CH2M or Company** means CH2M HILL, Ltd. and all of its affiliates, subsidiaries and majority owned or controlled joint ventures or similar arrangements worldwide.
- **CH2M Personnel** means all directors, officers, employees and contingent personnel of the Company, including personnel employed by agencies on the Company's behalf.

- **Chief Ethics and Compliance Officer** means that CH2M employee designated by the Audit Committee of the CH2M Board of Directors to have responsibility for implementing this Policy and overseeing the processes and procedures to monitor CH2M Compliance with this Policy.
- **Exposed CH2M Personnel** means:
 - any director or officer of a CH2M company, affiliate, subsidiary, or majority owned joint venture company;
 - any CH2M Personnel with a grade level of 10 or higher;
 - any CH2M Personnel employed in the Legal, Contracts, Finance, Accounting, Government Affairs, Communications, Sales/Business Development or Procurement departments or functions; or
 - any other employee whose job duties may place him or her in a position to encounter or detect potential violations of Anti-Corruption Laws.
- **Facilitating or Expediting Payments** are payments to a Foreign Official that are small in value and made to expedite or secure the performance of a routine, non-discretionary governmental action that is ordinarily performed by a Foreign Official and to which the Company would otherwise be legally entitled.
- **FCPA** means the U.S. Foreign Corrupt Practices Act of 1977 and any amendments thereto.
- **Public Official** means:
 - any officer or employee or representative of:
 - a government, or any department, agency, or instrumentality thereof;
 - a government owned or controlled commercial enterprise;
 - a public international organization;
 - members of royal or ruling families;
 - leaders or elders of indigenous or aboriginal peoples and their families;
 - an official of any political party, or a candidate for political office, or any person acting in an official capacity on behalf of any of the foregoing, whether paid or unpaid.
- **UKBA** means the United Kingdom Bribery Act 2010 and any amendments thereto.

DISCIPLINE

Violations of Policy 112, as with all CH2M policies or the CH2M [Employee Ethics and Business Conduct Principles \(Policy 101\)](#), will be taken seriously. Violators may be subject to disciplinary sanctions up to and including termination. In addition, individuals may be subjected to incarceration or fines if prosecuted by law enforcement authorities for breaches of anti-corruption laws.

EXCEPTIONS

There are no exceptions to Policy 112.

APPLICABILITY

Policy 112 applies to CH2M and to all [CH2M Personnel](#) wherever located. Policy 112 also applies to each joint venture or jointly owned entity (whether a partnership, incorporated, unincorporated, or consortium) (“joint

venture entity”) and to the directors, officers and employees of a joint venture entity in which the Company has (i) a majority ownership interest or (ii) effective control.

RESPONSIBILITIES

All corporate officers, employees, consultants and agents have a responsibility and duty to their co-workers, and to CH2M stockholders, to be sensitive to and to prevent actions or commitments that may be in violation of [Anti-Corruption Laws](#).

IMPLEMENTATION

The Company’s [Chief Ethics and Compliance Officer](#) has responsibility for the implementation of Policy 112 and establishes the procedures necessary for implementation of and monitoring compliance with Policy 112, including provision and regular review and updating (where necessary) of related anti-corruption training. The Company’s [Chief Ethics and Compliance Officer](#) may report matters related to this Policy directly to the CH2M Board of Directors, directly or through the Company’s General Counsel.

REFERENCES

[Anti-Corruption Contract Language for Third Party Contracts](#)

[Anti-Corruption Compliance Certification for Third Parties](#)

[Policy 102](#) – Engagement of Business Development Consultants, Commercial Agents, Sponsors, Political Advocates and Lobbyists

[Policy 104](#) – Political Contributions Policy

[Policy 105](#) – Gifts, Travel, Entertainment and Hospitality Policy

[Policy 305](#) – Joint Ventures Policy

ANTI-CORRUPTION CONTRACT LANGUAGE FOR THIRD PARTY CONTRACTS

Below are provisions that must be included in all third-party vendor, supplier, or contractor agreements and they may not be changed or deleted without the prior agreement of an appropriate member of the Legal Department.

Compliance with CH2M Supply Chain Ethics and Business Conduct Principles.

Supply Chain Ethics and Business Conduct Principles.

Acceptance by SUPPLIER of this Purchase Order constitutes agreement that those who work on CH2M's projects at any tier shall conduct business legally, ethically and in compliance with the Principles set forth in CH2M's Our Supply Chain Ethics and Business Conduct Principles to include where applicable, the Supplement for U.S. Government Work, both of which are available at http://www.ch2m.com/corporate/about_us/business_ethics.asp.

Compliance with CH2M Anti-Corruption Policy.

Compliance with all applicable laws regarding bribery and corrupt practices.

SUPPLIER and all of SUPPLIER's affiliates, employees, contractors, suppliers, agents or intermediaries (together, SUPPLIER's Representatives") shall not violate the United States Foreign Corrupt Practices Act ("FCPA"), the UK Bribery Act 2010 ("UKBA") or any other applicable laws regarding bribery or other corrupt practices.

SUPPLIER warrants and represents that SUPPLIER and SUPPLIER's Representatives shall adhere to and comply with the CH2M Anti-Corruption Policy, a copy of which is available at https://www.int.ch2m.com/intrnl/policies/PolicyGroups/assets/112-Policy_Against_Transnational_Bribery_CorruptPractices.pdf.

SUPPLIER warrants that none of its employees, officers, or principals is an official or representative of any government, or is a candidate for such position. In conformity with the FCPA, UKBA and CH2M's established corporate policies regarding business practices, SUPPLIER further represents and warrants that it and its employees, agents, and representatives shall not directly or indirectly make any offer, payment, promise to pay, or authorize the giving of anything of value for the purpose of influencing an act or decision of an official of any government or candidate for such an office, or any other person, including a decision not to act, or inducing such a person to use his influence to affect any government act or decision of a government or any other business decision in connection with CH2M's or its clients' business. SUPPLIER further agrees that the provisions of this Article shall be incorporated into any subcontracting agreement(s) SUPPLIER awards for all or a portion of the requirements of this Agreement. Any actual or reasonable suspicion of violation of the provisions of this Article by or on behalf of SUPPLIER or by any of SUPPLIER's contractors shall be advised to CH2M without delay, and may result in termination for default at CH2M's sole discretion.

Training and Certification of Compliance with Anti-Corruption Policy and other CH2M Policies.

Required Anti-Corruption training and certification of compliance with CH2M policies.

SUPPLIER shall designate principal representatives responsible for the delivery of services, work or products to CH2M to complete CH2M training on compliance with CH2M policies, including FCPA & UKBA compliance.

Upon request from CH2M, SUPPLIER shall certify compliance with CH2M Policies, including without limitation the CH2M Anti-Corruption Policy, substantially in the form attached here to as Exhibit [•], and shall allow periodic audits of SUPPLIER's records related to SUPPLIER's services provided under this Agreement to ensure SUPPLIER's compliance with SUPPLIER's obligations under this "[INSERT NAME]" section of this Agreement.

ANTI-CORRUPTION COMPLIANCE CERTIFICATION FOR THIRD PARTIES

CH2M ANTI-CORRUPTION CERTIFICATION

I, **[*insert name of authorized officer of certifying entity*]**, [individually and] on behalf of **[*insert name of certifying entity*]** and its officers, directors, employees and agents (together, the “Company”), do hereby represent, warrant and certify to CH2M HILL Companies Ltd. and all of its affiliates, subsidiaries related entities and to their respective officers and directors (together, “CH2M”) the following with respect to any business conducted with, or on behalf of, CH2M:

1. I have **[*represented*]** **[*served as the [•] of*]** the Company since **[•]**, am authorized to execute this certification and have conducted sufficient investigation to verify the representations in this certification.
2. The services provided by the Company to CH2M during the preceding year are as follows:

3. I am familiar with the United States Foreign Corrupt Practices Act of 1977, as amended, the United Kingdom Bribery Act 2010, as amended, the anti-bribery and anti-corruption legislation (if any) of **[*insert country to which agreement relates*]** and the Anti-Corruption Policy 112 of CH2M (collectively, “Anti-Corruption Laws and Policies” or individually an “Anti-Corruption Law or Policy”).
4. For the purpose of this certification, I understand that “Public Official” means:
 - any officer or employee or representative of:
 - a government, or any department, agency, or instrumentality thereof;
 - a government owned or controlled commercial enterprise; and/or
 - a public international organization;
 - members of royal or ruling families;
 - leaders or elders of indigenous or aboriginal peoples and their families; and/or
 - an official of any political party, or a candidate for political office, or any person acting in an official capacity on behalf of any of the foregoing, whether paid or unpaid.
5. All employees, contractors, agents or other persons representing the Company in performing any work or services for, or on behalf of, CH2M has received training provided by the Company about the Anti-Corruption Laws and Policies.
6. In performing any or all work and/or services for, or an behalf of, CH2M, the Company (and its employees, contractors, agents and other persons representing the Company) have complied with the Anti-Corruption Laws and the CH2M Anti-Corruption Policy 112
7. In performing any or all work and/or services for, or an behalf of, CH2M, the Company (and its employees, contractors, agents and other persons representing the Company) has not in the past, and will not in the future, either directly or indirectly (e.g., through any third-party):

- given, paid, offered to pay, or authorized the payment of, any money or anything of material value, to any person (including a Public Official) for purposes of:
 - unduly obtaining or retaining business for or with, or directing business to CH2M;
 - influencing any official act, decision or omission of such person;
 - inducing such person to do or omit to do any act in violation of his or her lawful duty;
 - securing any improper advantage; and/or
 - inducing such person to affect or influence any act or decision of another person;
 - used part of any payment, compensation, reimbursement or fee as a corrupt payment, gratuity, emolument, bribe, kickback, inducement or other improper benefit to a person (including a Public Official);
 - used any part of any payment, compensation, reimbursement or fee to provide any gift, entertainment, travel or hospitality to or for any Public Official on behalf of CH2M;
 - agreed to receive or accept a financial or other advantage as a reward for or intending that as a consequence, a work-related duty would be performed improperly; and/or
 - falsified any record.
8. The Company has referred, and will continue to refer, to CH2M’s Legal Department (compliance@ch2m.com) any requests by any person (including a Public Official) for, or offers to a person (including a Public Official) of, a corrupt payment, gratuity, emolument, bribe, kickback, inducement or other improper benefit related to any agreement or course of business with CH2M.
9. All representations, warranties and covenants contained in any agreement between the Company and CH2M continue to be fully accurate and the Company will immediately notify CH2M should any such information change during the course of any agreement or course of business with CH2M.

IN WITNESS WHEREOF, the undersigned has executed this Certificate as of the _____ day of _____,
_____.

Signed: _____

Name: _____

Position: _____



**APPENDIX 6.7: ANTI-BRIBERY CORRUPTION
POLICY**





Anti-Corruption Compliance Guidance

Global Supplement for working with Public Officials

May 2015



*Hong Kong Zhuhai
Macau Crossing
Hong Kong*



*Tideway Tunnel Improvements
London, England*



*U.S. Forces Korea Base
Relocation Program
South Korea*

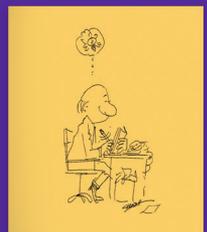


*London 2012 Olympic
and Paralympic Games
London, England*



*Panama Canal
Expansion Program
Republic of Panama*

Principles based on co-founder
Jim Howland's
The Little Yellow Book,
written in 1978



As Jim Howland states in the *Little Yellow Book*,

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

At CH2M, we work on some of the largest, high-profile projects around the globe. Working globally has challenges, especially in the areas of bribery and other forms of corruption. Operating ethically in all of our global markets is a core value fundamental to our continued success. True to that core value, it is CH2M’s policy to strictly comply with anti-bribery and anti-corruption laws of jurisdictions where CH2M does business, including the United States Foreign Corrupt Practices Act and the United Kingdom Bribery Act.

This booklet is an easy-to-use guide to the basic principles underlying these laws against corruption and our anti-corruption policies, including Policy 112. Please take a few minutes to review this booklet and if you have any questions whatsoever, please do not hesitate to contact any member of the CH2M Legal Department or send an email to compliance@ch2m.com.

In 1978, co-founder and former CH2M President James Howland wrote a collection of management quotations to capture the values on which our company was built.

The quotations became the basis for The Little Yellow Book, which is the foundation of The CH2M Way of doing business.

Learn more about The Little Yellow Book at: www.ch2m.com/ethics



What are corruption and bribery?

Corruption is the abuse or misuse of power for personal gain. Bribery is a common form of corruption in which money, gifts, loans or other advantages are provided to a person in a position of power and/or trust as an inducement to secure an improper advantage in the course of business.

What is CH2M's policy with regard to corruption and bribery?

CH2M has a zero tolerance policy toward corruption and bribery, wherever it occurs, and whoever it involves. Acts of bribery or corruption violate CH2M's policies and are grounds for disciplinary action (including termination). Such actions can also lead to criminal convictions, fines and imprisonment. CH2M is committed to the highest ethical standards in the conduct of its business.

For more information, please see CH2M's Policy 112 or contact CH2M's Ethics and Compliance Team at compliance@ch2m.com.

What laws govern corruption and bribery?

CH2M and its employees across the world are subject to the U.S. Foreign Corrupt Practices Act of 1977 (FCPA) and the U.K. Bribery Act 2010 (UKBA) as well as to other international and nationally applicable laws and regulations.

- These laws prohibit directly or indirectly offering, promising, giving or authorizing anything of value to a "public official" in order to obtain an advantage in the course of business or other favorable consideration.
- These laws also include record-keeping requirements, which require that accounting books and records be kept in reasonable detail and that they accurately and fully reflect transactions (where such books and records do not conceal improper payments).

The UKBA specifically covers domestic and foreign public officials, and also covers corrupt transactions between private individuals and businesses, regardless of any involvement of a public official.



Who are public officials?

The term "public official" (sometimes referred to as a "foreign official") is interpreted very broadly and includes all manner of officials, officers, employees, representatives and persons acting on behalf of any of the following:

- Any government, including federal, national and provincial governments, local/municipal governments, tribal, aboriginal, sectarian or community councils
- Political parties or candidates for office
- Administrative and judicial bodies, ministries, boards, commissions, councils, agencies and other government bodies (for example, courts, utility regulatory or management bodies, environmental protection agencies)

- Government-owned or controlled enterprises (for example, Crown corporations, development corporations and employees of state-owned oil companies and other corporations or entities over which government exercise direction and control)
- Publicly or government owned or funded organizations (for example the European Commission, the United Nations, the World Bank)

In general, relatives and close associates of public officials should be treated as though they are themselves public officials (in other words, bribing the spouse of a public official is treated the same as bribing the public official).

"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?'"



What are my responsibilities as a CH2M employee?

CH2M prohibits its employees and any person acting on behalf of CH2M (for example, agents and subcontractors) from offering, promising or giving anything of value to a public official or any other person (whether directly or indirectly through one or more intermediaries) in order to obtain an advantage in the course of business.

- “Anything of value” is interpreted broadly and includes bribes, money, meals, entertainment or hospitality, kickbacks, payoffs, commissions, gifts, prizes or any other consideration or arrangement.
- “Advantage in the course of business” is also interpreted broadly, and could include awarding contracts, agreeing not to oppose regulatory applications, waiving or disregarding regulatory requirements or any other considerations which might further CH2M’s (or its clients’) interests.

As set forth in Policy 112, CH2M employees must ensure that they obtain any internal approvals before proceeding with a transaction

or activity that could possibly involve providing anything of value to a public official. In particular, recording and reporting for payments, gifts and entertainment must be accurate and complete.

Can I provide gifts, entertainment or hospitality to public officials for business development purposes?

The provisions of gifts, hospitality and other entertainment to public officials can, in some circumstances, constitute a bribe (for example, where the provision of a gift, hospitality or entertainment is intended to influence the decision of a public official in furtherance of a business advantage for CH2M).

Because the distinctions between proper gifts, entertainment or hospitality and a bribe are often complex, it is CH2M’s policy that any such gifts, entertainment or hospitality must be approved in advance in accordance with Policy 112, which requires the approval of the CH2M Ethics and Compliance Team. Note that



the provision of gifts or entertainment to public officials could create a perception that they are being provided in exchange for a business advantage.

In general, gifts, entertainment or hospitality to public officials are prohibited and require the prior approval of the CH2M Ethics and Compliance Team. Nevertheless, certain customary and appropriate gifts, such as a CH2M mug, hat or shirt, may be provided in the ordinary course of business as a small token of appreciation. The following chart is provided to help clarify the difference between appropriate gifts and bribes:

Appropriate Gift	Bribe
Generally have nominal value, often has a symbolic value.	Generally higher in value than would be expected for a gift. Generally no symbolic value.
Generally given openly and directly, as its purpose is to build a business relationship.	Often given in secret or paid indirectly through third parties to conceal or obscure the identity of those involved.
No expectation that the recipient will alter his or her behavior.	Expectation or intention that recipient will alter his or her behavior (in other words, a quid pro quo arrangement).
Public disclosure would not be embarrassing to CH2M or the recipient.	Public disclosure could or may be embarrassing to CH2M or the recipient.
Provided in a transparent fashion both to the recipient and is recorded in books and records.	Provided secretly ("under the table") and not accurately recorded in books and records.

When questions arise, about whether providing any gift, entertainment or hospitality is appropriate, immediately contact compliance@ch2m.com.

What are my responsibilities with regard to third parties?

CH2M could be held liable for the acts of third parties (agents, subcontractors and other outside parties acting on behalf of CH2M), even if no one from CH2M authorized or is aware of such acts. For example, CH2M could be held liable for failing to adequately supervise a third party who directly or indirectly gives an improper inducement to a public official or anyone else to secure an improper advantage.

In every transaction that involves an agent, consultant, subcontractor, joint venture partner or representative or involves other circumstances where there may be a concern about compliance with the FCPA or UKBA, we must perform a due diligence investigation, as directed by the CH2M Legal Department, to provide assurance that the party is a legitimate and trustworthy enterprise that will comply with the FCPA, UKBA and any other applicable laws, and that other potential corrupt practice concerns are properly reviewed. These investigations must be conducted before entering into any agreement and at later stages in the event a red flag is raised.

Appropriate anti-corruption compliance assistance and training will be provided by the Company to any agent, sponsor, consultant or other third-party representative of CH2M and the directors, officers and employees of such parties as necessary. Please contact the CH2M Ethics and Compliance Team at compliance@ch2m.com if you have any questions about due diligence or training of any third-parties.

Red Flags

You must immediately report any suspicious or questionable circumstance to compliance@ch2m.com. While not exhaustive, the following is a list of potential warning signs, or "red flags," that may indicate there is a corruption issue with a third party:

- A reputation for unethical conduct
- A request for an unusually large commission or payment, or a request that payment be made in cash
- A request for payments to another person or entity (rather than directly)
- A request for false invoices or other false documentation
- Insistence on anonymity
- Recommendation by a public official
- Lack of necessary staff, facilities, expertise or qualifications
- Refusal to sign anti-corruption contractual provisions
- Refusal to disclose owners, partners or principals
- Use of shell companies
- A close relationship with a public official
- Use of unregulated or foreign jurisdictions for banking transactions

If you have any questions on these matters or are in doubt with regard to the proper course of action, immediately contact the CH2M Ethics and Compliance Team at compliance@ch2m.com. Further, you must immediately report any suspicious or questionable circumstance to the CH2M Ethics and Compliance Team at compliance@ch2m.com.



CH2M Global Headquarters

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USA

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Tel: +1.303.771.0900

Fax: +1.720.286.9250

CH2M has designed The GuideLine to provide you 24/7/365 access anywhere in the world either by phone or online. You can contact The Guideline one of three different ways:

- Online: guideline.ch2m.com
- Toll Free in the US and Canada at +1.866.924.4843
- Caller Paid at +1.720.286.4843

Compliance Questions:

compliance@ch2m.com