



Integrity

Policy

GHD Group

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→ The Power of Commitment



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GHD Group Limited | ACN 118 062 258

Level 15, 133 Castlereagh Street

Sydney, NSW 2000, Australia

T +61 2 9239 7100 | **E** sydmail@ghd.com | **ghd.com**

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1. Introduction

GHD is committed to ethical business behaviour in respect of the internal conduct of its business, and in engagement with external stakeholders and the public.

GHD is guided by its [Code of Conduct](#) and core values of Safety, Teamwork, Respect and Integrity. Consistent with the Code of Conduct and core values GHD will:

- only seek work and to participate in business transactions under high standards of corporate ethics, with complete integrity and compliance with the law;
- act in the interests of the client and community while undertaking services with professional integrity; and
- not conspire with any party to defraud anyone or act in an improper manner in its operations.

GHD has a 'zero tolerance' approach towards unethical business practices.

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

GHD will cooperate fully with lawful requests from external agencies investigating corrupt practices within any legal parameters.

2. Application

This Policy applies to all of GHD unless the Board specifically indicates otherwise or local legislation prevents its application, including all GHD employees, subconsultants and contractors. It applies to both GHD's internal conduct and GHD's engagement with external stakeholders and the public.

A breach of this Policy may result in disciplinary action which may include termination of employment.

3. Ethical business behaviour

GHD is committed to ethical business behaviour in all jurisdictions in which we operate. This includes conduct within GHD, and engagement with clients and the community. The pivotal element of GHD's approach to integrity is zero tolerance of illegal, unethical, or unacceptable business conduct. All GHD people (employees and contract staff) are required to be familiar and comply with GHD's Integrity Management System, which includes this policy and subordinate documents.

GHD's commitment to ethical business behaviour means:

- Compliance with all applicable law is fundamental, even in the face of contrary accepted local business practices or customs.
- Competing fairly for business based on experience, quality, price and innovative services, not by offering improper benefits to others. No GHD representative may directly or indirectly give, offer, promise, grant or authorise giving money, something of value, or a benefit to any person, including clients and government officials, to obtain an improper advantage or that would be an inducement or reward for a person to act or refrain from acting in the performance of their duties.
- Facilitation fees are prohibited, even if permitted by local law.
- All charitable donations must be approved, transparent and clearly documented including the giver or recipient's identity and confirmation that it was used for the intended purpose.
- No direct or indirect, financial or in-kind, political contributions will be made, including donations to politicians, parties or political candidates. People who make political contributions will not be reimbursed.

- Gifts and entertainment, given and received, must be sufficiently modest that they could not affect, or be perceived to affect, a business outcome. Gifts and entertainment must comply with applicable laws and recognised local customs, be approved and recorded. Refer to [Gifts and Entertainment Standard](#).
- All financial transactions must be transparent and recorded in accurate books and records able to withstand the scrutiny of audit.
- Employees make business decisions in the best interests of GHD and its clients, and not based on their personal interests. Any interest that could be an actual, potential or perceived conflict of interest in the course of execution of professional duties must be disclosed. Refer to [Conflicts of Interest Standard](#).
- Fostering an open environment where all employees can report any suspected fraudulent or other improper practice without fear of reprisal. Refer to [Whistleblower Standard](#).
- GHD will cooperate appropriately with relevant authorities in connection with bribery and corruption investigations.
- Business partners including our suppliers, subconsultants and joint venture partners will be required to meet, or better, GHD's standards of ethical business practices.

GHD is a member of the UN Global Compact (UNGC). The 10th Principle of the UNGC is – Businesses should work against corruption in all its forms, including extortion and bribery. Refer to the [Sustainability and Social Responsibility Policy](#) for further detail.

4. Integrity management standard

GHD has established an [Integrity Management Standard](#) (IM Standard) to define the standards of business behaviour and conduct, and associated principles of operation to give effect to the commitments in the Integrity Management Policy. The IM Standard applies to all activities of GHD, whether internal, or from engagement with external stakeholders and the public.

The IM Standard is supported by the [Integrity Investigation and Reporting Guidelines](#) which set out the processes for incident management.

5. Integrity Compliance Officer

An Integrity Compliance Officer (ICO) will be appointed by the Enterprise. For routine matters, the ICO will report to the Chief Risk Officer, however a direct communication link will be maintained between the ICO and the Board's Audit Committee, via the Committee's Chair. Should any member of the ELT be implicated in an integrity matter, the ICO will deal directly with the Chair of the Audit Committee in the investigation and resolution of the matter.

6. Incident reporting

Any actual or suspected breaches of this policy including any subordinate documents must be reported to the GHD Integrity Compliance Officer. Any report will be investigated and handled in accordance with the [Whistleblower Standard](#) and the [Integrity Investigation and Reporting Guidelines](#).

Reports may be made:

- via email – integrity.officer@ghd.com
- by calling the Integrity Hotline (+61 7 3316 4187, or VOIP 414187)

Alternatively, notification can be made through Navex EthicsPoint. You may request your report to be confidential.

EthicsPoint - GHD	CONTACT DETAILS
Online	https://secure.ethicspoint.com/domain/media/en/gui/60398/index.html
Mobile QR Code	
PHONE	Telephone Number
Australia	1-800-370-826
Canada	1-(844) 470-6621 Primary language: English
Chile	1. Dial the direct access number for your location: Chile (Telmex - 800) - 800-225-288 Chile (Telefonica) - 800-800-288 Chile (ENTEL) - 800-360-311 Chile (ENTEL - Spanish Operator) - 800-360-312 Chile (Easter Island) - 800-800-311 Chile (Easter Island Spanish Operator) - 800-800-312 2. At the English prompt dial (844) 470-6621
New Zealand	0508-717-066
Papua New Guinea	000 861 265
Philippines	1. Dial the direct access number for your location: Philippines (PLDT - Tagalog Operator) 1010-5511-00 Philippines (Globe, Philcom, Digitel, Smart) 105-1 2. At the English prompt dial (844) 470-6621
Qatar	0800 100 957
UAE	1. Dial the direct access number for your location: UAE 8000-021 UAE (du) 8000-555-66 UAE (Military - USO and cellular) 8000-061 2. At the English prompt dial (844) 470-6621
United Kingdom	0808-234-9145
United States	1-(844) 470-6621

7. Subordinate documents

The following subordinate documents support the Integrity Policy and are subject to approval as noted in Table 1.

Table 1 Subordinate documents

Document	Approval authority
Integrity Management Standard	Board
Integrity Investigation and Reporting Guidelines	ELT
Whistleblower Standard	Board
Conflicts of Interest Standard	ELT
Gifts and Entertainment Standard	ELT

