



# Code of conduct



→ The Power of Commitment

GHD's proud history and success is largely attributable to its global workforce, comprising over 11,000 skilled professionals dedicated to delivering imaginative and critical thinking and exceptional client service.

Our culture is rich and diverse - there is no limit to the positive impact that can be achieved by GHD's global network of professionals, with a shared commitment to a common purpose.

The Code of Conduct sits at the heart of our business. It articulates the principles behind our core values of Safety, Teamwork, Respect, and Integrity.

I encourage all employees to take pride in observing GHD's Code of Conduct and to live our values as together we create lasting community benefit.

Please read this Code carefully and refer back to it whenever you feel unsure of what is expected of you.

Be sure to **Speak Up** if you become aware of conduct that falls short of our expectations.

With our purpose at front of mind and our values guiding our path, we will continue to create an exceptional and sustainable business into the future.

**Robert Knott**  
Executive Chair

# Who this Code applies to

This Code of Conduct (the 'Code') establishes behavioural expectations and conduct requirements for all people employed or engaged by GHD Group Limited and its subsidiary companies (GHD).

This includes all employees of GHD-related entities and affiliates, members of the GHD Group Limited Board of Directors, the Enterprise Leadership Team and the Enterprise Management Team.

The Code is also intended as a guide to help you to promote the way we do business by a commitment to ethical business practices and by conduct consistent with our core values of Safety, Teamwork, Respect, and Integrity.

You are also required to comply with all applicable laws and regulations and GHD Policies.

The Code should be read in conjunction with the legal requirements which may apply, and your obligations under other GHD Policies.

While the Code is written in an inclusive tone and uses language such as "we" and "our", the obligations it imposes apply to each of us as individuals. Compliance with the Code is mandatory and a personal responsibility.

When you have questions or concerns, we expect you to:

- refer to the Code
- seek advice, and
- **Speak Up**





# Speak up

At GHD, everyone is encouraged to report their concerns without fear of reprisal. This is essential for empowering employees, maintaining a good workplace culture and reinforcing GHD’s commitment to zero tolerance of unethical business practices.

GHD operates in a complex business environment which may result in you being faced with legal and ethical challenges. If you have any concerns, or if you suspect there has been a breach of this Code, you are urged to **Speak Up**. In some circumstances you are *required* to **Speak Up**.



Your direct manager is usually the main point of contact for you to seek advice and discuss issues of concern. There are also multiple teams available to support you when you Speak Up. These are detailed below:

Concern	Contact		Reporting portal
Personal well-being	People Team / Employee Assistance Program	HSE Team	
Your role or remuneration	People Team		
Sexual harassment or other form of harassment, discrimination or bullying	People Team		Navex EthicsPoint*
Health Safety and Environment	HSE Team		GRC
Any breaches or suspected breach of GHD’s Integrity Framework	Integrity Officer		GRC Navex EthicsPoint*
Accounting or financial business practices	Internal Audit		
If you fear reprisal	People Team	Integrity Officer	Navex EthicsPoint*
Personal data breaches	Legal		GRC
Cyber security threat	IS Help		

\*Matters escalated to Navex EthicsPoint are able to be reported on an anonymous basis

## Retaliation

GHD will not tolerate retaliation against individuals who report their concerns in good faith. Retaliation is a serious violation of the Code. All genuine allegations of retaliation will be investigated, and appropriate action taken.

# Safety

GHD is committed to pursuing the highest standards of health and safety both for our people and for others affected by our operations and services. We require you to ensure that you and the people with whom you work are protected from health and safety risks and work in a safe work environment whether it be our offices or other work sites. To deliver on this commitment you are required to:

- comply with applicable work health and safety legislation and standards
- participate in GHD's mandatory work health and safety training, follow GHD's reasonable directions in relation to work health and safety and, where applicable, comply with our clients' work health and safety systems
- implement the "Stop Work Authority" when unsafe behaviours or conditions are identified
- foster a health and safety culture, accepting personal accountability for your own work health and safety and for the work health and safety of others including each person's psychosocial wellbeing
- **Speak Up** if you become aware of any HSE incidents, near misses or hazards



# Teamwork

We work collaboratively within our global community and with our clients to pursue the common goal of delivering the best outcomes possible for our clients, our community, and our company. You are expected to:

- be curious and open to understanding our clients' needs
- be authentic and strive to develop trusted relationships with our clients
- understand our capability across the enterprise and the value we can collectively bring.





# Respect

At GHD we respect each individual and nurture both internal and external professional relationships through listening and understanding.

At GHD diversity is part of our identity. We respect and value the diverse backgrounds of our people. We are committed to creating a diverse workplace and inclusive culture and to treat all people equitably and fairly. We value our employees and treat every person with respect, dignity and courtesy irrespective of a person's individual attributes.



# Integrity

At GHD we have zero tolerance for unethical business practices of any form. We conduct our business with the highest standards of professional and ethical behaviour with respect to our clients, our communities and within our own business. You are required to:

- comply at all times with applicable anti-bribery laws and regulations at the time and in the location in which you operate
- never promise, offer or make favours, bribes, kickbacks, grease payments or facilitation payments
- never offer gifts, financial payments, favours or benefits either directly, or through a third party, that are intended to provide GHD with an improper, unfair, or illegitimate commercial advantage
- only offer and accept gifts, hospitality and entertainment that is permitted under GHD Policies
- **Speak Up** if you become aware of any business conduct by our personnel or by others which may be or perceived to be unethical



# Data privacy and personal information

GHD only collects, stores and uses personal data for the purpose and in the manner for which it is required to fulfil a legitimate business purpose or for which GHD has appropriate consent. You are required to:

- apply the appropriate level of security to personal data
- **Speak Up** and report any incidence of unauthorised access to, disclosure, use or loss of personal data



## Environment and sustainability

GHD is committed to applying and promoting technical endeavour in understanding, managing, and mitigating our impacts on people and planet, and by making our own operations and supply chain more sustainable. We strive to deliver responsible business solutions that leave sustainable legacies. You are required to:

- comply with all applicable environmental laws
- implement the “Stop Work Authority” when conditions are identified which place the environment at risk



# Conflicts of interest

GHD is proactive in the identification, management and disclosure of conflicts of interest. Where it is considered that a conflict cannot be adequately dealt with through management and disclosure, the conflict must be avoided.

On an ongoing basis, you are required to:

- identify, declare and manage potential and actual conflicts of interest
- register relevant personal interests on the Interest register in our GRC platform
- adhere to any agreed conflicts management protocols, and
- **Speak Up** where conflicts have not been appropriately managed, or where conflicts management protocols have not been adhered to



## Fair competition

GHD is committed to competing fairly in all the markets in which we operate. GHD does not obtain competitive intelligence through illegal or unethical methods. You are required to:

- comply with any applicable laws to promote fair competition
- never engage in bid-rigging, price fixing, market or customer allocation
- **Speak Up** and report any suspected anti-competitive or anti-trust behaviour

# Property including intellectual property and confidential information

GHD employees are required to protect and respect the property and assets, including intellectual property, of GHD and of others against theft, misuse, loss, unauthorised disclosure or damage.

You are required to maintain the confidentiality of proprietary information, records or materials, whether GHD's or a client's, during and beyond employment at GHD. You must observe any probity plans in relation to confidential information and only share information where you are authorised to do so.

GHD will protect non-public information obtained from or concerning other third parties in accordance with legal, professional and contractual requirements.



## Acceptable use of technology

You are required to use GHD technology assets and services for legitimate business purposes and to take reasonable steps to ensure the security of physical assets and information on GHD networks.

When using technology related to social media and other forms of electronic communication GHD employees are required to use good judgment and be accurate in communications which should reflect professionally on GHD. GHD will monitor, review and restrict information as deemed appropriate, subject to applicable laws and regulations.

**Speak Up** and report any suspected cyber security threat.





# Protecting GHD's brand and reputation

Established in 1928, GHD has a proud history. Our brand and reputation is one of our most valuable assets. You are required to promote and protect GHD's brand consistently and accurately.

## Disciplinary measures if breached

Disciplinary action may be taken by GHD for a breach of this Code. Action will be commensurate with the nature and impact of the breach. This action may impact your ongoing employment with GHD, including possible termination of your employment.



## Contact details

Employee Assistance Program

People Team

Integrity Compliance Officer or telephone +61 7 3316 4374

HSE Team

Data Privacy and Personal Information

Navex EthicsPoint:

