



# Anti-Corruption and Anti-Bribery Statement

HDR strives to conduct business honestly, fairly, ethically, free from corruption, and in compliance with all applicable laws. HDR does not tolerate corruption or bribery and requires our workforce, customers, and other business partners to comply with applicable anti-bribery and anti-corruption laws. These laws include the US Foreign Corrupt Practices Act of 1977, the Bribery Act 2010 of the United Kingdom (often referred to as the UK Bribery Act), Canada's Corruption of Foreign Public Officials Act, European Union's November 2015 Anti-Corruption Law, Germany's criminal code sections 331 to 338, Australia's Crime Legislation Amendment, Saudi Arabia's Regulations for Combating Bribery, the Organization for Economic Cooperation and Development anti-bribery convention, and the World Bank Guidelines on Preventing and Combating Fraud and Corruption.

Bribery is a form of corruption in which there is an abuse of entrusted power or position for private gain. A bribe is an inducement or reward offered, promised, provided, or received, directly or indirectly, to gain any commercial, contractual, regulatory, or personal advantage. It is a crime to offer, promise, give, request, or accept a bribe and individuals found guilty can be punished by imprisonment and/or a fine.

Bribery is unacceptable in all its forms. HDR considers it unacceptable for its workforce, customers, or other business partners to, for example:

- Give, promise to give, or offer, a payment, gift or hospitality with the expectation that a business advantage will be received
- Give, promise to give, or offer, a payment, gift or hospitality to a government official, agent or representative to "facilitate" or expedite a routine procedure
- Accept payment from a third party that the recipient knows or suspects is offered with the expectation that it will obtain a business advantage for them
- Accept a gift or hospitality from a third party if the recipient knows or suspects that it is offered or provided with an expectation that a business advantage will be provided by the recipient's organization in return
- Threaten another worker who has refused to commit a bribery offence or who has raised concerns under HDR policies
- Engage in any activity that might lead to a breach of any applicable HDR policy

## Donations

HDR makes charitable donations that are legal and ethical under local laws and practices. HDR does not permit facilitation payments.



## Record Keeping

HDR keeps financial records and has implemented appropriate internal safeguards. HDR also keeps a written record of hospitality and gifts, given or received, in accordance with our internal policies. All accounts, invoices, and other records relating to dealings with third parties including suppliers and customers subject to internal controls and audit. HDR does not allow "off-book" accounts to facilitate or conceal improper payments.

## Raising Concerns

HDR encourages its workforce, customers, and other business partners to raise concerns about any issue or suspicion of corruption or bribery at the earliest possible stage. HDR does not retaliate (or tolerate retaliation) against anyone for refusing to pay or accept a bribe even if such refusal results in a loss of business, or for expressing concerns regarding any of the foregoing. HDR encourages openness and will support any employee who raises genuine concerns in good faith even if they turn out to be mistaken. Such concerns may be anonymously reported to the [HDR Integrity in Action Hotline](#) at 888.847.5277 from the United States or Canada. For international calls, use this [link](#) to find the appropriate number. Please note that the hotline is operated by a third-party processor engaged by HDR. The information you report may be transferred outside of the country from which you are making the report, including to the United States.

Any employee failing to comply with HDR's anti-corruption and anti-bribery policies will face disciplinary action, which could result in punishment up to and including termination. HDR may terminate its relationship with consultants, contractors, suppliers, customers, and other business partners if they breach HDR's anti-corruption or anti-bribery policies or any related laws.

For further information or to contact us about our anti-corruption and anti-bribery policies or any issues or suspicion of corruption or bribery, please contact HDR Legal Compliance Department.

A handwritten signature in black ink, appearing to read 'John W. Henderson'.

John W. Henderson  
Chief Executive Officer

January 1, 2024