

South Wye Transport Package: Southern Link Road

Response to Mr and Mrs Jamieson's queries

Construction

1. WSP | Parsons Brinckerhoff is owned by WSP Global Inc following the acquisition of Parsons Brinckerhoff in October 2014. The WSP | Parsons Brinckerhoff Code of Conduct and Sustainability Policy is enclosed.
2. A register of potential environmental impacts and measures to reduce environmental impacts have been identified in Appendix 2 of the draft Construction Environmental Management Plan (CEMP). This includes a requirement to prepare a risk assessment (Appendix A of the draft CEMP, page 49). The contractor will be required to produce a final version of the CEMP which complies with the measures set out in the draft CEMP, under the terms of the planning permission if granted. The contractor will also be required to adhere to best practice and this will be set out in the terms and conditions of the contract between Herefordshire Council and the contractor when appointed.
3. The Highways Department of Herefordshire Council was consulted on the planning application and has not raised any concerns or objections.
4. The baseline noise survey was undertaken on 19th November 2014 using a Rion NL52, Class 1 Sound Level Meter mounted on a 1.2 metre tripod. Measurements were taken at four locations, including Haywood Lodge Cottages, over a three-hour period between 10.00 and 17.00 on a typical weekday and this information was used to validate the noise model. The predicted noise levels during construction take into account noise from construction machinery as well as traffic using local roads, including Haywood Lane (see paragraph 11.3.6 to 9 of the Environmental Statement). The predicted noise levels during operation take into account the predicted Annual Average Week Day Traffic Flow over an 18-hour period (06.00 to 24.00), average traffic speeds, percentage of Heavy Goods Vehicles, road gradient, road surface, distance of a property from the road, and nature of ground cover between the property and the road (see paragraph 11.3.17 to 27 of the Environmental Statement).
5. The effects of noise on all potentially affected residents have been taken into account in the assessment.
6. The source of power for the machinery will be identified by the contractor.
7. The planning application includes a plan showing potential construction compounds. The location of construction compounds and their layouts will be identified and designed by the contractor when appointed by Herefordshire Council. Prior to the start of construction the contractor will be required to submit a Construction Environmental Management Plan (CEMP) for the approval of the local planning authority, which will provide further detail on construction arrangements (including identification of the compound locations). Local residents will be consulted on these arrangements. In accordance with the draft CEMP (see para. 4.2.1, page 10) contractors will be required to plan the site layout of construction compounds to maximise distance from plant to sensitive receptors.
8. Contractors will be required to reduce noise levels during construction through a range of measures set out in the draft CEMP (see 9.2.7, page 25), including the use of temporary screen / hoarding at the closest properties to the works. Prior to the start of construction the contractor will be required to submit a final CEMP for the approval of the local planning authority, which will provide further detail on construction arrangements including the location and design of the temporary screens. Local residents will be consulted on these arrangements.

9. The applicant would accept a planning condition limiting the hours of construction and Herefordshire Council Environmental Health has requested that the hours be restricted to 07.30 to 18.00 Monday to Friday and 08.00 to 13.00 Saturday.
10. The Contractor will have an Environmental Co-ordinator who shall be responsible for on-going community consultation during the construction period (see 3.10 of the draft CEMP). This will be required through the conditions of the planning permission, if granted, and as part of the contractual arrangements between Herefordshire Council and the contractor when appointed. Breaches of planning conditions will be investigated and subject to enforcement by Herefordshire Council planning and environmental health officers.
11. Best practice measures to reduce dust arising from construction activities are set out in the draft CEMP (Section 4) in order to avoid dust deposition on residential properties. Daily on-site and off-site visual inspections shall be undertaken and recorded. Responses to any complaints about dust will be investigated by the contractor's Environmental Co-ordinator who shall be responsible for on-going community consultation during the construction period (see 3.10 of the draft CEMP).
12. The Contractor would be responsible for measuring noise on and around the site during construction and will undertake weekly as set out in the CEMP (9.2.20, page 27).
13. Condition Surveys prior to and on completion of the works will be undertaken by an appropriately qualified surveyor.
14. The construction period will be approximately two years as stated in Paragraph 3.6.3 of the Environmental Statement. More detail on construction phasing and activity will be determined by the contractor when appointed.
15. The matter of providing temporary accommodation during construction will be dealt with under statutory compensation. In extreme circumstances it may be necessary to provide temporary accommodation to alleviate construction nuisance but we would expect to address that once a construction management plan is in place and at this stage it should not be assumed that this would be a compensable cost.
16. See answer to question 15. If there is a financial loss that is directly related to the scheme and in accordance with statutory compensation code then it would be recoverable from the acquiring authority. Again it would be advisable to discuss this with the Council in advance of taking any particular action to ensure costs are not incurred that are not recoverable.
17. Prior to the commencement of development, the Contractor will be required under the terms of the construction contract to identify, locate and implement measures to protect all existing services and utilities.

Landscape Report

1. The proposed landscape mitigation is described in paragraphs 7.6.2 to 7.6.7 of the Environmental Statement and in the note on Landscape Design Principles subject to consultation in November 2015. This note has been updated and submitted to the Local Planning Authority in March 2016. It is shown on the Landscape Mitigation Plan (see Figure 7.4 of the Environmental Statement) and additional plans submitted in March 2016. Details of planting maturity and density will be submitted to the planning authority for approval under the terms of the planning permission if granted.

Noise Report

2. The proposed Landscape Mitigation Plan (Figure 7.4 of the Environmental Statement) includes a mix of trees and shrub planting as well as graded embankments which will help to screen and integrate the road into the landscape when constructed. Planting is identified in the Landscape Mitigation Plan.

Light

3. Car headlights at night are not specifically addressed in the Environmental Statement. However, lighting effects and general light spill are considered in the Landscape Chapter (Chapter 7) of the Statement. It should also be noted that parts of the road are within cuttings, including adjacent to The Green, at a depth of between 2.4 m and 0.9 m below existing ground level.

Vibration

4. The effects of vibration have been assessed in Chapter 11 of the Environmental Statement, specifically paragraph 11.5.10 (construction) which concludes that, given the separation distance of the closest properties to the proposed Scheme (33m), it is considered that ground-borne vibration will be unlikely to cause structural or cosmetic damage to buildings. Paragraphs 11.5.29 and 30 (operation) conclude 97 properties would be subject to an increase in airborne vibration nuisance of less than 10%, 581 properties would be subject to no change at all with 97 properties subject to a decrease in airborne vibration noise nuisance. Condition surveys will be undertaken before and after construction works.

5. The assessment has assumed that the road will be constructed with a low noise surface to mitigate the impacts of noise during operation.

6. The impacts of vehicle emissions on human health during operation have been assessed and the results are identified in paragraph 5.5.7 of the Environmental Statement. It concludes that the background concentrations are currently well within the air quality objectives for the protection of human health and ecological receptor for all pollutants, and it is predicted that they will improve over time.

7. Any future planning application for the Western Relief Road will be accompanied by an Environmental Impact Assessment and Transport Assessment which will assess the impacts of increased traffic on the Southern Link Road.

8. Given the offset distance of this property from the scheme alignment, the long term operation of a road cutting in this area is highly unlikely to have a significant effect on the perched groundwater table or natural soil moisture content directly below property foundations.

9. A Structural Engineering Report has not been prepared and would not normally be required at this stage.

10. The Haywood Lane Bridge will have 1.8m high steel parapets with a mesh infill. The exposed side elevations of the abutment and wingwalls will be clad with masonry (detail to be agreed with the local planning authority prior to construction subject to a condition).

11. The speed limit for the whole of the Southern Link Road between the A49 and A465 will be 60mph.

12. No traffic calming measures or weight limits are currently proposed for Haywood Lane. The speed limit of Haywood Lane is currently 40mph. As part of the Active Travel Measures, which will be subject to public consultation in 2016, a short section of foot/cycleway at the northernmost end of Haywood Lane to lead to a proposed crossing point on the A465, over and towards Ruckhall Lane is being considered. This would provide better connections from the western end of the foot/cycleway through the country park from the direction of Newton Farm.

13. Following the completion of the SLR, the alternative route for vehicles over 16ft will be via the SLR and not Hayward Lane. Therefore, the designation will no longer be required.

14. The last traffic survey along Haywood Lane undertaken in support of the planning application was completed between 29th April and 6th May 2014.

CODE OF CONDUCT

MARCH 2015

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CODE OF CONDUCT

APPROVED BY THE BOARD OF DIRECTORS ON MARCH 17, 2015

INTRODUCTION

As a professional services firm, we seek to adopt best practices that contribute to preserving the reputation we have built over the years. This reputation, along with the excellence of our professional services, enables us to maintain the relationships of trust we have with our clients, shareholders, employees and other stakeholders.

We are proud of our success, which rests not only on the excellence of our services and leadership, but also on the loyalty of our clients. This is the result of our disciplined and thorough approach to the work we do and the motivation we feel to give the best of ourselves.

Our employees are all ambassadors for WSP Global Inc. and its subsidiaries (collectively, the "Corporation") and their actions, whether on a business, professional or personal level, reflect on our organization. The integrity of our business depends on the integrity of each and every one of our employees.

In order to continue to earn the trust of our clients and stakeholders, and to preserve our reputation, we must set high standards of conduct for ourselves. In that regard, our Code of Conduct (the "Code") reflects our commitment to abide by ethical principles in our business dealings with clients, shareholders, employees and suppliers. It aims, among other things, to provide guidance and a framework for our actions and behaviours with respect to our corporate obligations as well as our business activities. This Code applies to all our employees, officers and members of the board of directors.

Integrity is everyone's business. All employees must read our Code, adopt it and, as a matter of obligation, comply with it. Each of us has a role to play in upholding the very highest standards of integrity.



Pierre Shoiry

President and Chief Executive Officer

TO WHOM DOES THE CODE APPLY?

The Code applies to all employees, without exception. This includes the President and Chief Executive Officer, officers, vice presidents, directors and other managers, all staff employed with the Corporation, its subsidiaries and affiliated companies and members of the board of directors of the Corporation (hereinafter collectively referred to as the "**Employees**").

Because of their leadership role, the management and senior executives of the Corporation are expected to set an example by conducting themselves in an exemplary manner at all times and in all situations.

As a professional services firm whose staff includes Employees from many different backgrounds, we are also governed by the codes of ethics of various professional orders and organizations. We are required to comply with those codes as well.

A US Supplement to the Code also provides guidance to all Employees on the special requirements that apply when contracting with US federal, state and local governments.

It should be noted that this Code does not replace or amend any legislative or regulatory provisions. We have also put in place policies which everyone must follow. All Employees are encouraged to read over our various policies, which can be found on the Corporation's intranet sites.

EACH PERSON HAS AN ESSENTIAL CONTRIBUTION TO MAKE...

We work in a professional services industry and we act accordingly. We are our Corporation's best ambassadors; we all play a key role by complying with our Code and our policies.

AM I REQUIRED TO COMPLY WITH THE CODE?

All Employees have a responsibility to understand the Code, and compliance with the Code is mandatory. All Employees must respect the values and principles set out in the Code and perform their duties with honesty and integrity in all areas not specifically addressed by the Code. Any violation of the Code is subject to disciplinary measures by the Corporation, up to and including dismissal.

Disciplinary measures subject to national laws and collective agreements may be taken against any Employee who:

- violates the Code or does not adopt the conduct advocated therein;
- encourages other Employees to violate the Code;
- deliberately breaches the obligation to report a Code violation or fails to do so promptly, or withholds relevant information concerning a violation;
- refuses to cooperate during an investigation related to a suspected or known violation;
- confronts an Employee who reports a practice violation.

The Code sets forth general principles to guide Employees in making ethical decisions. However, it does not cover every possible situation. There is

nothing in the Code that would prevent the Corporation from taking disciplinary action on matters involving Employee misconduct, whether expressly covered by the Code or not.

HONESTY IS...

Never getting involved in theft, fraud, bribery or any sort of breach of trust situation in the performance of our duties.

For example: All transactions, assets and liabilities of the Corporation recorded in its books must accurately reflect its overall operations. All statements and reports, including expense reports, invoices, pay slips and Employee records, must be prepared carefully and honestly. No transactions may be kept from management or from the Corporation's auditors.

WHO INTERPRETS THE CODE?

The governance, ethics and compensation committee of the board of directors of the Corporation (the "**Governance and Compensation Committee**") and the Chief Risk and Ethics Officer, are responsible for overseeing the interpretation of the Code. The Governance and Compensation Committee may review, modify or amend the Code at any time to reflect the complexity of the changing business environment in which we operate. We also have an Internal Audit department tasked with ensuring that these governance standards are respected.

WHO ARE THE MEMBERS OF THE GOVERNANCE AND COMPENSATION COMMITTEE? WHAT ROLE DOES IT PLAY IN RELATION TO THE CODE?

Three independent directors sit on the Governance and Compensation Committee. This committee is responsible for developing best in class governance standards for the Corporation and for reviewing related procedures to ensure compliance with applicable legal rules and regulations.

BUSINESS INTEGRITY

We work with honesty and integrity at all times. We understand that the future of our business depends upon the trust of our clients and other stakeholders, and our reputation for technical expertise and reliable, ethical conduct. The opposite of integrity is dishonest behaviour, including corruption, that would undermine our reputation for fair dealing.

In all our business activities, we comply with both the letter and the spirit of national and international laws. Regardless of which country they find themselves in, the Corporation Employees must diligently protect the Corporation's integrity at all times. Also, Employees must comply with the legal and regulatory requirements of the countries where the Corporation conducts business.

The Corporation is subject to anti-corruption laws, including the *Canadian Corruption of Foreign Public Officials Act* (CFPOA), the *United States Foreign Corrupt Practices Act* (FCPA), and the *UK Bribery Act*. These submit the Corporation to the strictest anti-corruption laws in the world. They apply to all Employees and subsidiaries everywhere in the world, regardless of nationality or location. The penalties for infringement of these laws include fines and prison sentences for individuals and heavy fines for companies – often running to hundreds of millions of dollars. For more information on anti-corruption legislation, please refer to the policy entitled *Understanding Bribery Issues*, which is available on the Corporation's web and intranet sites.

Our Code of Conduct takes account of our legal and regulatory requirements, and is designed to provide overarching guidance, so that Employees can be sure that if they adhere to this Code, they will be in compliance with increasingly complex international and national regulations.

In all our business activities, we act with integrity. In particular:

- We prohibit bribery, and the making of undue payments or kickbacks in any form, whether large or small, direct or indirect.
- We are committed to the principles of fairness and excellence in our dealings with all our business partners, and expect the same commitment in return. We require all joint venture partners, as well as agents, sponsors, representatives, suppliers and subcontractors acting on our behalf to apply ethical principles that are consistent with our own.
- We prohibit the offer or receipt of gifts, hospitality, expenses or inappropriate benefits whenever such arrangements could constitute, or appear to constitute, an undue influence on the outcome of business transactions or the integrity of our business relationships.
- We keep accurate books and records throughout our operations.
- We expect our Employees to avoid personal activities and financial transactions that could conflict – or be seen to conflict – with those of the Corporation. If there is a potential for conflict, the interests of the Corporation must take priority.
- We protect the trade secrets and confidential information of the Corporation, and will respect the same rights on the part of our business partners.

NO BRIBES OR KICKBACKS

We prohibit all forms of bribes and kickbacks.

Bribery includes payments to secure a business advantage to which we are not entitled. A bribe may take the form of a financial inducement, a gift in kind, or some other favour, such as an offer of employment to a relative of the person being bribed. None of these are acceptable.

Kickbacks arise when suppliers of service providers pay part of their fees to the individuals who awarded the contract, or provide some other form of business advantage.

NO FACILITATION PAYMENTS

We prohibit facilitation payments. **Facilitation payments** are small payments to officials with a view to speeding up routine governmental transactions to which the payer is already entitled. They are often known as 'speed money' or 'grease payments'. Examples include payments to speed up customs clearances, and extra fees to officials to secure electricity connections.

If you encounter a demand for a facilitation payment, or you think you are likely to do so, you should report the situation to local senior management or the Risk and Ethics Officer's local representative so that we can formulate a response.

The senior management team recognizes that demands for facilitation payments are often backed by a form of extortion, in some cases including the threat of violence or personal harm. An extreme example would be a demand for payment to secure an emergency admission into a hospital, leaving no time to consult a line manager.

In such circumstances, we accept that Employees will need to use their best judgment in accordance with the Corporation's business integrity principles, always keeping in mind that personal health and safety are paramount. Whatever happens, Employees must report any incident where they feel forced to make facilitation payments as soon as possible, and any payments made must be properly recorded. Management will support Employees who made the best decision they could, and reported the incident in a timely manner. A post-event assessment will be conducted and a mitigation plan will be implemented to ensure, when possible, that certain events do not reoccur.

WORKING WITH THIRD PARTIES

It is important to note that we do not pay bribes, either directly or indirectly. Our Business Integrity principles apply to all external parties who act for us as well as our own Employees. We make this commitment on ethical grounds and because we and our Employees could be held legally accountable if our business partners are involved in any malpractice – such as the payment of bribes, when acting on our behalf.

A typical example of indirect bribery would be a case where a company employs a commercial agent to help it win a government contract. The agent is paid by commission based on a percentage of the contract fee, and, with or without the company's knowledge, part of that commission is passed on to the government official who awards the contract in order to influence his decision. The Corporation does not tolerate such practices. A high proportion of

violations and prosecutions for violations of anti-corruption law have involved payment to third parties.

For more information on identifying indirect bribery risk, and managing third-party relationships, please refer to the *Working with Third Parties Policy*, which is available on the Corporation's web and intranet sites.

RELATIONS WITH GOVERNMENT OFFICIALS

Some Employees deal with different levels of government and with their administration. As the Corporation continues to increase its international reach, our Employees are also likely to come into extensive contact with foreign government officials.

Most national and international legislation focuses on public officials, though the *UK Bribery Act* also covers bribes between private individuals. Employees must therefore take particular care when involved in any business relationship or discussion with a government official.

It is important to note that anti-corruption legislation often uses a wide definition of government officials – those who are not simply traditional representatives of governments at the federal, state or municipal levels (appointed or elected). It may also encompass a wide range of civil servants, as well as employees of state-owned or state-controlled entities. Enforcement proceedings in the United States have made it clear that a very wide definition of foreign official can be used in enforcement proceedings.

For more information on how to identify and manage bribery and corruption risk relating to third parties, including foreign officials, please refer to the *Working with Third Parties Policy*, which is available on the Corporation's web and intranet sites.

POLITICAL CONTRIBUTIONS AND INVOLVEMENT

Political contributions and donations can involve cash and non-cash, such as the use of corporate facilities, services or materials, or Employee time. Typically, they are to support a governmental entity, or a political organization, party or candidate. As a general rule, the Corporation does not make any political donations or contributions. This being said, in the US, certain political contributions and campaign donations are permitted by law and are an accepted part of local custom and practice with respect to government and industry engagement.

In the US, our operating companies may make political contributions or donations, provided they are approved by the Regional President & CEO and comply with policies and processes approved by the Corporation. Any permitted political contribution should not be such that its scale or affiliation might be seen as excessive or inappropriate. The laws on lobbying and government relations are complex and differ between jurisdictions. Whenever and wherever we act on behalf of the Corporation, we must take great care about what we say or do in the public or political domain.

Our Employees should always be clear on supporting facts and have the appropriate approvals when talking with governments and public bodies. Interactions with public officials shall comply with our Code and existing guidelines. Our Employees should never engage in any public policy activity

on behalf of the Corporation or appear to represent the views of the Corporation unless expressly authorized to do so.

Everyone who works for the Corporation has the right to participate in political activities in their personal capacity and to pay political contributions out of their own pocket, so long as this does not lead them into a real or apparent conflict of interest situation. Furthermore, no Employees will be reimbursed in time, money or in any other form of compensation by the Corporation for their activities.

SOLICITING, GIVING AND RECEIVING GIFTS AND FAVOURS

We have adopted the principle that Employees may not solicit, give or receive, either directly or indirectly, gifts, gratuities, special allowances, favours or benefits in relation to an individual or corporation with which they do business, if the benefit could unduly influence the judgment of the recipient by creating a disproportionate obligation to return the favour or by creating an appearance of impropriety.

In the business world, it is important to build up good personal relationships with clients and, on occasion, with government officials. As part of this process, you may meet for lunch or dinner and want to pay the bill. Sometimes you may wish to exchange token seasonal gifts. Most exchanges are harmless but you need to be vigilant. If there is any appearance that either party is under a business obligation as a result of the gift or meal, then it is not acceptable.

By maintaining our independence, we avoid real or apparent conflicts of interest. We must decline or return an invitation or a gift that is offered repeatedly or whose significance makes us feel uncomfortable, and notify our immediate superior.

For more information and guidance on gifts, entertainment and hospitality, including examples, please refer to the *Gifts, Entertainment and Hospitality Policy*, which is available on the Corporation's web and intranet sites.

BOOKS, ACCOUNTING RECORDS AND INTERNAL CONTROLS

We are required under various securities legislation, tax laws and other laws, regulations of other countries and jurisdictions, and International Financial Reporting Standards (IFRS) to keep books, records, and accounts that accurately reflect our overall operations and to establish for this purpose an appropriate accounting and internal control system. We must therefore ensure that the Corporation's books, records and accounts are valid, complete and accurate, and based on verifiable supporting documentation. Under no circumstances will we keep parallel accounts.

The Corporation has adopted internal controls and procedures to meet its accounting requirements and comply with legislation and regulations. Employees are required to implement such controls and procedures in order to ensure that all financial transactions are recorded completely and accurately. All Employees in supervisory roles must also implement internal controls relating to the activities for which they are responsible, with a view to safeguarding the assets of the Corporation and ensuring the accuracy of its financial reports and accounts. All Employees must comply with the established procedures.

No one may interfere with the process of auditing the Corporation's accounts by the internal or external auditors, nor seek to improperly influence the auditing process, either directly or indirectly.

Employees must not:

- improperly accelerate or defer the recording of revenues or expenses so as to give the impression that financial targets or results have been attained;
- keep assets or funds "in reserve" by not officially recording them in the books;
- establish or maintain accounts and financial records in an inadequate, incomplete, fraudulent or misleading manner;
- issue payments for reasons other than those stated in the supporting documents;
- submit or approve an expense report where they suspect that some expenses were not actually incurred, are not accurate, do not clearly or accurately describe the expense or its purpose or do not comply with the expense policies;
- sign any documents that they know or suspect to be inaccurate or untruthful.

Any Employee with knowledge of irregularities concerning the accounting of a transaction involving the resources of the Corporation must report this promptly to his/her immediate supervisor and/or to the Vice President of Internal Audit. Irregularities can also be reported in a confidential manner in accordance with relevant internal procedures, notably through our whistleblowing service.

RESPECTING COMMUNITIES

We contribute positively to communities wherever we work through the services we provide and the lasting infrastructure we leave for the public, such as schools, hospitals, other social infrastructure and transport systems. We are never complacent about the way we operate in a local area, or the impact our operations can have on local people and their environment. We listen, we care about people's concerns, and we act on them wherever and whenever we can.

We believe that profitable markets, healthy communities and environmental limits are not competing interests; they are shared outcomes that closely align with one another. In order to be a successful and profitable company, we need to realize that alignment. We will always respect the traditions, cultures and laws of the countries in which we operate and will take into account the concerns of the wider community, including both national and local interests. We will listen to the concerns of local communities and, wherever we can, we will act to mitigate them to the very best of our powers. Communities affected by our projects will be regularly updated and informed of their progress. Additionally, we will seek to employ qualified local people on our projects wherever possible.

CONFLICTS OF INTEREST

In order to maintain the trust of our clients and the public, all Employees must avoid putting themselves in a real or apparent conflict of interest situation. As an example, a conflict of interest exists if you allow or appear to allow your personal or private interests or the interests of your family, other relatives or associates (a company you own or in which you have an interest, a business partner, etc.) to affect your ability to perform your work objectively, impartially and effectively.

If an Employee believes that there is a real or apparent conflict of interest, he/she must promptly report the situation, in writing, to his/her immediate supervisor and must complete the prescribed register which can be found on the Corporation's intranet.

The following principles and rules are intended to guide Employees so they can avoid real or apparent conflicts of interest whereby personal interest may be to the detriment of the Corporation's interests.

LOYALTY AND SERVICE EXCLUSIVITY

All Employees are required to behave in a loyal manner at all times so as to protect the interests of the Corporation.

All Employees are required to work exclusively for the Corporation while being employed by it. This requirement may vary in certain regions and is subject to local laws and collective agreements. Employees should check with local Human Resources.

Employees may not carry out business activities or accept mandates on behalf of third parties, either directly or indirectly, for compensation or otherwise, which compete with the regular activities of the Corporation, unless they have obtained prior consent from their supervisor and the Regional Risk and Ethics Officer.

In the event that a member of management is asked to become a board member of a company or other organization, he/she may not accept such an appointment without prior approval from the Regional President and CEO.

EXAMPLES OF CONFLICT OF INTEREST

WHEN AM I MOST SUSCEPTIBLE OF EXPOSING MYSELF TO A REAL OR APPARENT CONFLICT OF INTEREST?

The following are examples of real or apparent conflict situations you may encounter in your daily work and the action to be taken.

- Doing or carrying on business with family and friends must be disclosed and you must remove yourself from any selection process.
- Information on corporate business opportunities contemplated by the Corporation should never be discussed with third parties in which an Employee may have a direct or indirect interest in.
- Direct supervision of anyone with whom you have a family relationship must be avoided as it could give rise to an appearance of favouritism.

- Disposal of any Corporation assets in favor of an employee, his/her family, relative or associate for a consideration lower than fair market value must be authorized by the Risk & Ethics and Legal departments.

HOW CAN I TELL IF I AM IN A CONFLICT OF INTEREST SITUATION? ASK YOURSELF THE FOLLOWING QUESTIONS:

- Am I performing my duties in a completely objective and impartial manner?
- Do my actions or decisions result in a financial or other benefit for me, a relative, a friend or any other person including companies or other entities with whom there is ownership interest?
- Could my actions or decisions give the impression that I am acting in my own personal interest or in the interest of a relative or friend?
- Are my actions and decisions in line with corporation values?
- Would I be embarrassed to discuss this with my supervisor or my colleagues?

LOYALTY ALSO MEANS...

Avoiding behaviours that might be prejudicial to the Corporation, its image and its reputation. This continues to apply following termination of employment, by respecting the confidentiality of the Corporation's information.

Loyal behaviour also includes being constructive, rather than critical, in our comments to co-workers in order to improve our practices.

BENEFITS OR FAVOURS RELATING TO THE ACTIVITIES OF THE CORPORATION

Employees must not seek to take advantage of benefits or favours that could arise or be discovered by them as a result of their employment at the Corporation. They must not use the Corporation's property, or information obtained through employment with the Corporation, to their own benefit.

Employees must not seek to take advantage of business opportunities that could become available to them outside the workplace if these concern existing or proposed business activities. Moreover, Employees may not use property or information belonging to the Corporation for personal advantage, nor may they compete with the Corporation in any business endeavour.

In a similar vein, subject to business relationships that the Corporation may already have negotiated or entered into with certain business partners, Employees may not use the Corporation's name to obtain discounts or any other preferential treatment, without written authorization.

STOCK MARKET TRANSACTIONS AND INSIDER TRADING

Securities legislation imposes restrictions on the purchase, sale or other dealings of securities by anyone possessing "privileged" information that is not yet public knowledge and that could impact on the share price of the securities of a given corporation.

Employees are therefore not authorized to sell or purchase securities of the Corporation, or third-party companies with which it has business dealings,

when they have knowledge of material non-public information obtained in the course of employment, nor are they authorized to pass on such "tips" to anyone else. In addition, Employees must take care not to inadvertently disclose confidential information to their spouse, family members or anyone else living in their household, or to business partners, friends or acquaintances, because this could be considered "insider trading."

It is not possible to define all categories of "material non-public information." However, information should be regarded as "material" and "non-public" if it has not been previously disclosed to the general public and is not otherwise available to the general public, and if there is a reasonable likelihood that it would be considered important to an investor in making an investment decision regarding the purchase or sale of the Corporation's securities.

For example: Such privileged information could spur investors to buy, sell or trade the Corporation's securities, as well as the securities of third-party companies with which it has business dealings.

Examples of information considered to be "material" until disclosed publicly include:

- acquisition-related information;
- quarterly and annual financial statements;
- strategic plans;
- business results;
- corporation operating statistics;
- major changes in senior management.

WHAT IS AN "INSIDER"?

An insider is an individual who possesses material non-public information on the Corporation. An individual who conducts transactions on the securities of the Corporation before that information becomes known to the public is engaging in insider trading.

For example: An Employee knows that we are just about to conduct an important transaction to finalize an acquisition that could have an impact on the value of our shares. This person buys or gets another person to buy shares on the stock exchange before that information is made available to the general public.

For more information on insider trading, our employees have access to the *Insider Trading Policy*, which is available on the Corporation's intranet site.

USE OF CORPORATION ASSETS

Employees must make appropriate use of the Corporation's property and physical resources, as well as its proprietary and other confidential information. Employees are also responsible for protecting the Corporation's assets, both tangible (material, buildings, personnel, property, information, revenue streams, etc.) and intangible (communication networks, information systems, intellectual property, etc.) All Employees must act in a reasonable manner and take appropriate safeguards to prevent losses attributable to the deliberate actions of others, whether these take place inside or outside the Corporation, and to prevent situations that could result in injuries, property damage, theft, loss, abuse or unauthorized access to physical assets or logical property, or to intellectual property (including data).

CARS OR OTHER VEHICLES

As part of their duties, Employees are sometimes required to use a Corporation vehicle, their personal vehicle or other types of motorized equipment. Driving while impaired or under the influence of any drug or substance is strictly prohibited. Furthermore, when driving a car or other vehicle, Employees must comply with the laws and regulations in force in the location where they are driving, and will be held personally responsible for any violation or fine to which they may be subject. Employees must also drive with care, respect and courtesy.

SOLICITATION

Our workplace, facilities and physical resources must not be used for solicitation, publicity or advocacy purposes not directly related to the business activities of Employees, except in the case of charitable or other activities approved in advance. It is strictly prohibited for an Employee to canvass on Corporation premises to the benefit of a third party for any reason whatsoever.

FOR EXAMPLE...

Soliciting a co-worker in an insistent manner may bother or create discomfort for the person as he/she might feel obliged to make a contribution. The same applies to advocacy; we must avoid expressing or imposing our political or social opinions for the purpose of securing support in any form.

PROPERTY

Employees must acknowledge that any right, title or interest pertaining to patents or copyrights derived from work performed while employed by the Corporation, either alone or in collaboration, remains the property of the Corporation.

Information technology (IT) equipment and tools are supplied to Employees by the Corporation primarily to facilitate and support the Corporation's business operations and to help Employees do their work. No individual employed by or under contract to the Corporation may use, without prior authorization from his/her supervisor or the vice president, IT equipment and tools for business purposes other than those of the Corporation. IT equipment and tools must not be used for any illegal or improper purposes.

The Corporation's name and logo are trademarks that cannot be used by Employees except in the context of their functions according to the graphic design standards established by the Communications department.

FUNDS

Employees must properly use and protect cash, cheques and postage, and ensure that all expense reports, claims and invoices are accurate and approved in accordance with the Corporation's policies. Employees must produce receipts (supporting documents or proof of purchase) for any expenses incurred on behalf of the Corporation, justify their expenses and follow the reimbursement procedure established by the Corporation. They must charge all expenses and transactions to the appropriate accounts. Whenever possible, Employees should use the services of business partners with whom the Corporation has agreements.

YOU SHOULD ALSO KNOW...

Employees may, however, use telephones, e-mail and Internet in the workplace for dealing with personal matters provided that usage is reasonable and that it does not disrupt the flow of work or result in additional costs for the Corporation.

HELPFUL INFORMATION...

The Corporation trusts its Employees and deems them responsible for managing their expenses with good judgment, as though they were dealing with their own funds. We invite our Employees to read their local policies on expense statements for full details.

FRAUDULENT OR DISHONEST ACTIVITIES

Employees are strictly prohibited from carrying out fraudulent or dishonest activities in regard to the assets of the Corporation. Such activities include without limitation:

- Falsification of supplier invoices or receipts;
- Fictitious payroll transactions;
- Deliberate false statements, made orally or in writing, about the Corporation, other Employees, supervisors, oneself or work-related situations;
- Approval or receipt of payment for goods not received or services not performed;
- Misappropriation of funds, securities, supplies or any other assets;
- Creating or altering hardcopy or electronic documents with the intent to defraud the Corporation or its clients;
- Falsification of financial or accounting data related to cash transactions;
- Improper use or falsification of the Corporation's letterhead for non-business related purposes.

ALSO OF NOTE...

Because the Corporation is a responsible firm concerned about maintaining its reputation, and because we are a public corporation, the Audit Committee of the Corporation's board of directors (the "**Audit Committee**"), in cooperation with Management, developed internal procedures, including the whistleblowing service procedure, which is available on the Corporation's web and intranet sites. The intent of such procedures is to create an open and empowering atmosphere in which any Employee who witnesses suspicious activities or has serious doubts in that regard can express his/her concerns in complete confidence.

CONFIDENTIAL INFORMATION

GENERAL

We operate in highly competitive markets. Therefore, Employees must be aware of the fact that, as in any competitive environment, confidential information and trade secrets must be protected in the same manner as other assets of value to the Corporation. Information on pricing, products or services under development, intellectual property, and other trade secrets such as information on corporation acquisition or divestiture plans, must be handled in strictest confidence. In addition, reasonable preventive measures must be taken to prevent unauthorized disclosure. In performing their duties, Employees must only use such information for the purposes for which it was compiled. All files, notes and reports acquired or created in the course of employment remain the property of the Corporation. Document originals or copies may be taken out of the Corporation's offices, in whole or in part, with the authorization of the Employee's supervisor, provided such documents are kept in a secure environment at all times, that they are used only to perform the duties of Employees, and that they can be returned to the Corporation at any time upon request.

PROPRIETARY INFORMATION

Many documents and much of the Corporation's information (including confidential information) are proprietary. That means they contain highly confidential information that is crucial to the Corporation's business. Information provided to the Corporation by a third party may also be proprietary, confidential or secret and must therefore be dealt with in accordance with the instructions provided by the third party. All proprietary confidential information must be protected against unauthorized disclosure or misuse. Proprietary information includes the following:

- Documents relating to acquisitions;
- Business plans;
- Information on new technologies;
- Strategic plans;
- Files and information relating to legal proceedings;
- Files and information on business partners;
- Confidential information about Employees;
- Audit reports;
- Training material and manuals;
- Proprietary software.

Depending on the information involved, unauthorized disclosure or improper handling of such information could have serious repercussions for the Corporation. For example, the Corporation could be placed at a competitive disadvantage; it could also be exposed to legal proceedings or have its image tarnished.

FOR EXAMPLE...

Employees must return to the Corporation any confidential documents or documents of a commercially strategic nature in their possession upon termination of their employment, as such material is the property of the employer.

DISCLOSURE OBLIGATIONS

We are required by virtue of various securities legislation to inform the public on a regular basis concerning the state of our business and financial situation. This is done primarily through our quarterly and annual reports as well as through material published in connection with the annual shareholders' meeting. The Corporation provides additional disclosures through information produced for specific occasions, such as communications with financial analysts and quarterly press releases. All Employees who are involved in preparing and disseminating such information or who themselves offer such information have an obligation to ensure that the disclosure is full, fair, accurate, timely and understandable.

We have adopted control methods and procedures designed to meet our disclosure requirements. An Employee with knowledge that information made public is not accurate, complete or timely, or with knowledge that a given development or fact may require disclosure, must report the matter immediately to our Risk and Ethics department.

To ensure maximum consistency in the information disclosed to the public, only a limited number of individuals are authorized to communicate with the financial community on behalf of the Corporation. These individuals are:

- the Chairman of the Board;
- the Chief Executive Officer;
- the Chief Financial Officer;
- the Communication/Investor Relations Officer;
- other persons authorized by the Chief Financial Officer.

All employees have access to more information on disclosure obligations in the Corporation's *Public Disclosure Policy*, available on the Corporation's Intranet.

MEDIA RELATIONS

The Corporation encourages every country to be timely, responsive and open with local media, to create opportunities that enhance the firm's image and safeguard its reputation. All media relations activities (including social media such as, but not limited to, Twitter, Facebook, LinkedIn or YouTube), with the exception of the restrictions above, are coordinated by the Regional Head of Communications in each country.

Given the large size and international structure of the Corporation, it makes many routine announcements or otherwise discloses information to the public that would not meet the definition of prohibited disclosure set out in the *Public Disclosure Policy*. Many of these routine communications relate to (i) specific projects, (ii) clients, (iii) work-in-progress, (iv) awards, or (v) views expressed by experts working for the Corporation. Please note that when making a

disclosure about a specific project, prior client consent must always be obtained.

When an information request involves disclosure of information, the disclosure of which is or may be restricted, the Regional Head of Communications/Marketing will contact the Investor Relations Officer for guidance regarding the request prior to providing a response. The Investor Relations Officer may require that the Regional Head respectfully decline the request as containing confidential or proprietary information or may allow the Regional Head to proceed with a response.

Staff members who are not authorized to serve as spokespersons at the corporate or country level will not respond on behalf of the Corporation to any enquiry from, or initiate communication with, the media. The Regional Head of Communications/Marketing has a duty to speak truthfully and openly to the best of his/her knowledge regarding the Corporation, subject to the disclosure restrictions detailed in the *Public Disclosure Policy* and the *External Communications Policy*, available to employees on the Corporation's Intranet.

FAIR DEALING WITH OTHER PEOPLE AND ORGANIZATIONS

Any business transacted on behalf of the Corporation must be conducted in an honest and straightforward manner so as to protect the integrity and reputation of the Corporation. In addition, it is our policy to avoid misrepresentation, manipulation or concealment or any misuse of confidential information, and to not engage in any unfair practices with shareholders, clients, suppliers, competitors and Employees.

COMPETITORS

We value fair and open competition. We will not enter into any business arrangement that eliminates or discourages competition or that confers an inappropriate competitive advantage, as such arrangements interfere with commerce and free trade. Activities of this type include price fixing agreements, boycotting of suppliers or clients, price fixing for the purpose of eliminating a competitor, entering into an agreement or arrangement with competitors for dividing a market, etc. Our Employees must comply with *Canada's Competition Act* and similar legislation in other countries.

INFORMATION ABOUT COMPETITORS

Employees are entitled to stay informed about the markets in which the Corporation operates and this includes obtaining information about our competitors, their products, services, technologies, pricing, marketing campaigns, etc. However, such information must be collected through legal and ethical means, failing which the Corporation would be acting illegally and could expose itself to legal proceedings.

SELLING OUR SERVICES

Our clients expect that we will offer them quality services, and that we will be accurate in describing the benefits that may be derived from such offerings. To maintain the trust of our clients, we:

- only offer services that we are authorized to provide alone, under contract, through an alliance or through an agent;
- only offer services that clients desire;
- always promote our services in a straightforward and honest manner;
- allow our partners to ask any questions they want about their competitive choices;
- always deal with our clients in a courteous, professional and constructive manner.

WE VALUE CLIENT CARE...

We develop innovative solutions, manage efficiently and deliver the best projects for our clients. We provide a constructive experience based on professionalism and a proactive approach to client needs.

EMPLOYMENT POLICIES

We are committed to providing a work environment that is characterized by respect and dignity. Employees are expected to conduct themselves with honesty and integrity, and to treat others with fairness, dignity and respect. Each individual is entitled to work in a businesslike environment that is free of discriminatory practices and that promotes equal employment opportunities. That is why we expect that relations between individuals in the workplace will at all times be professional in nature and free from any form of unlawful discrimination or harassment.

It is Corporation policy to provide Employees with equal employment opportunities without any discrimination or harassment based on race, colour, national or ethnic origin, religion, sex (including pregnancy or childbirth), sexual orientation, age (except as provided by law), marital status, family status, mental or physical disability, or any other status protected by law.

It is our policy to comply with all applicable employment and labour legislation, as well as any other legislation governing employer-employee relations and the workplace and existing collective agreements. No Employee may interfere with or retaliate against another Employee who seeks to assert his/her rights under legislation governing labour or employee relations. Any questions regarding labour and employee relations or related Corporation policies should be directed to the Human Resources department.

DEVELOPING OUR PEOPLE

The Corporation's decisions about recruitment, hiring, compensation, development and promotion are made solely on the basis of a person's ability, skills, experience, behaviour, performance and potential for the job. Our employees can expect:

- a clear understanding of our goals and objectives, and of the performance standards and behaviour expected of them;
- training to further develop their skill set in their role;
- fair evaluation of their performance.

If we employ the best people and give them an environment in which to grow and develop, we will achieve our business goals and keep these people with us. Developing our people is the best way to develop our organization.

We are committed to:

- employing people who will uphold our core values and our standards of ethical conduct;
- creating a working environment in which all our people feel valued;
- encouraging and supporting all our people so that they can achieve their best;
- identifying and satisfying training and development needs, so our people can perform and develop their potential;
- upholding a fair system of recognition, reward and promotion across the Corporation;

- never denying a promotion or opportunity on the basis of any form of discrimination.

ALCOHOL, DRUGS AND OTHER SUBSTANCES

We are committed to providing a drug-free and alcohol-free workplace. The consumption of alcoholic beverages by Employees while on duty or on Corporation premises is strictly prohibited. In exceptional circumstances, managers may authorize the reasonable consumption of alcoholic beverages in connection with an official ceremony or activity. Possessing, using, selling or offering illegal drugs and other controlled substances is prohibited in all circumstances while on duty or on the premises of the Corporation. Smoking is also prohibited in the workplace except as specifically provided for in certain designated areas. Please check with the local Human Resources department.

Moreover, Employees are prohibited from reporting for work under the influence of alcohol, an illegal drug or a controlled substance. Our complete local employment policies are part of the Employee manuals and are available to Employees on their respective intranet or via their Human Resources department.

FOR EXAMPLE...

As regards alcohol consumption in the workplace, a manager may authorize the consumption of alcoholic beverages as part of a social gathering designed to commemorate a co-worker's years of service.

PREVENTION OF VIOLENCE

Employee safety is of vital importance to the Corporation. We will not tolerate any violence or threats of violence in the workplace. Any Employees who, on the Corporation's premises, experience, witness or otherwise become aware of a violent or potentially violent situation, or a similar situation that could have repercussions on the Corporation's business, must immediately report this to their supervisor.

DISCRIMINATION AND HARASSMENT

We prohibit all types of unlawful discrimination, including harassment, whether directed against an individual or group, including Employees, clients and shareholders. Harassment is usually defined as any behaviour, often recurrent in nature, which negates an individual's dignity and the respect to which he/she are entitled because the behaviour is offensive, embarrassing or humiliating or creates a hostile or intimidating work environment. Harassment may take different forms, such as any of the following examples:

- Unwelcome remarks or jokes about an individual's race, colour, national or ethnic origin, religion, sex (including pregnancy or childbirth), sexual orientation, marital status, family status, age, mental or physical disability, or a conviction for which a pardon has been granted;
- The display of discriminatory or offensive pictures, posters, emails or screensavers;

- The transmission or receipt of messages or files, by e-mail or any other form of delivery, that are illegal, sexually explicit, abusive, offensive, profane, unwelcome, or that may tarnish our image;
- Sexual harassment;
- Inappropriate physical contact;
- Threats, intimidation, or verbal abuse;
- Psychological harassment;
- Any other action that may reasonably be perceived as offensive or disrespectful.

PERSONAL EMPLOYEE INFORMATION

Our policy is to protect the privacy of Employees and to collect personal information only for purposes relevant to the Corporation's business. Upon request, Employees have the right to have access to their personal information.

"Personal information" means information about an identifiable individual, but does not include the name, title or business address or business telephone number of an Employee. Personal Employee information refers to records like an Employee's file and other documents collected and used for business purposes, such as compensation, benefits or other services.

All personal information must be protected by safeguards appropriate to the level of confidentiality of the information and may only be used for the purposes for which it was collected. Personal information about an Employee may only be disclosed to individuals who need such information for business purposes or whose duties require it, or to third parties where required by law or with the Employee's consent. All Employees (including managers and non-managers) with personal information concerning other Employees must take steps to ensure its protection. In addition to the safeguards that normally apply in such circumstances (storage in locked drawers or filing cabinets, password access and data encryption), Employees must refrain from openly discussing personal Employee information in public.

PROTECTION OF PERSONAL INFORMATION

In doing business, we acquire personal information on business partners, suppliers and clients. It is only acquired in connection with the products and services we provide. Furthermore, we are only authorized to use the information for the purposes for which it was originally collected and which our partners, suppliers and clients would reasonably expect.

We must comply with privacy legislation that requires us, among other things, to identify the reasons why we collect personal information in the first place, and to obtain our clients' consent before collecting, using or disclosing such information. Personal information must be duly safeguarded and access limited to those individuals with a legitimate need to know such information in order to perform their duties. Questions relating to the protection of personal information should be submitted to the Human Resources department.

OCCUPATIONAL HEALTH AND SAFETY

We are committed to providing a safe and healthy work environment for our Employees. We expect Employees to observe applicable legislation, along with the guidelines included in our *Global Health and Safety Policy*, and the instructions of their managers.

Work-related incidents and accidents, together with any concerns about workplace health and safety, must be immediately reported to your immediate supervisor, the Human Resources department or the person in charge of on-site health and safety.

Our Employees are invited to read our *Global Health and Safety Policy*, which is included in the local Employee manual and posted on our intranet sites.

THE ENVIRONMENT

We are committed to complying with all applicable environmental legislation. Employees are encouraged to conserve resources and to reduce waste and toxic emissions by participating in recycling and energy conservation initiatives and by submitting innovative solutions to our clients as part of a sustainable development vision. Our Employees must also comply with any sustainable development policies put in place by the Corporation on a global as well as local basis.

COMPUTER, E-MAIL AND INTERNET POLICIES

THE INTERNET: A VITAL COMMUNICATIONS TOOL

The Internet is an important work tool for the Corporation and its Employees. We encourage Employees to use the Internet access provided to them to search for available information and to increase their knowledge and efficiency. Employees will find numerous learning and development opportunities on the Internet. When using this tool, individual Employees are responsible, from both a personal and professional standpoint, for protecting the Corporation's interests in accordance with this policy and the principles set forth in the Employee manual.

PERSONAL USE OF INTERNET ACCESS PROVIDED BY THE CORPORATION

Internet access is provided primarily for conducting business. Nevertheless, we encourage personal use of the Internet access it provides so that Employees can fulfill certain training and professional development needs.

PROTECTION OF CORPORATION INFORMATION

The Internet has no inherent security features designed to protect data integrity, ensure confidentiality or protect an organization's intellectual property and proprietary information. As such, the Internet presents risks for both the Corporation and its Employees. Consequently, Employees must make every effort to protect the Corporation's information against loss or unauthorized use, and they are required to report any breach of security rules that may occur. Data that is generated on a company device/network for the purpose of the business of the Corporation is the property of the Corporation. In addition to being responsible for safeguarding the Corporate information, Employees cannot share it outside of the Corporation.

Furthermore, Employees should not put data in cloud storage, unless the service has been set up and provided through the IT department.

Only the Communications department and designated representatives are authorized to state official positions on behalf of the Corporation. Any material received or downloaded from the Internet must be scanned with the latest version of Corporation approved anti-virus software before any programs are executed. All Corporation proprietary information must be encrypted to the extent possible. Any equipment connected to our internal telecommunications network must use an access service approved by the Corporation. If no approved access is available, approval must be obtained from the IT department.

YOU SHOULD KNOW...

Personal Internet use must be reasonable, i.e., it must not prevent an Employee from performing his/her duties in whole or in part, reduce productivity or effectiveness at work, or negatively impact the Corporation in any way. Employees should not use the corporate network for purposes such as soliciting and/or proselytizing for commercial ventures, religious or personal causes, or to aide or benefit outside organizations. **The Internet access provided by the Corporation is a privilege, not a right.**

IMPORTANT RESTRICTIONS

Certain types of information and communications material available via the Internet must under no circumstances be created, used, accessed, downloaded, disseminated, printed or stored. Although this is not an exhaustive list, examples of prohibited material include obscene, pornographic, sexually explicit, racist, offensive, criminal, slanderous, discriminatory, rude, violent, harassing or hate messages. **Violation of these restrictions could lead to disciplinary measures.** The participation of Employees in blogs or other social media on behalf of the Corporation is authorized subject to communication guidelines established by the Corporation. The Corporation will neither defend nor indemnify any Employee who receives a demand letter or against whom legal proceedings are initiated for illegal, non-ethical, prohibited or irresponsible use of Internet access privileges, including contributing content to and participating in blogs and other social media.

Employees should not connect personal devices that have not been explicitly approved by IT to the corporate network.

Employees are not allowed to bypass or disable any security controls or tools that are implemented by the Corporation, use any other Employee's access to corporate resources, impersonate other individuals or perform any activities on the corporate network or a corporate-owned device that would reasonably be considered "hacking."

ADDITIONAL INFORMATION

Employees who seek clarification about the appropriate use of the Internet access provided by the Corporation should contact the local Human Resources department or the IT department where appropriate. The Corporation will advise Employees of any technological innovations that may require new interpretations of, or changes to, the existing policy.

SOFTWARE

Employees are prohibited from making copies of software purchased or owned by the Corporation and from using software for which the Corporation does not have the required license or has not paid the required license fee, in violation of copyright or trademark laws. The use of personal software for private purposes is only acceptable under certain conditions and upon approval by management.

WHAT ABOUT PRIVACY?

The Corporation reserves the right to block, track, monitor and disclose traffic flowing through the network for network management security purposes. Therefore, Employees should have no expectation of privacy in regard to their use of the Internet, including e-mail messages. Subject to applicable laws, regulations and procedures, suspected violations of the policy will be investigated.

COMPUTER VIRUSES

Employees are prohibited from installing on the Corporation's computer systems applications or utilities (including those downloaded from the Internet) that have not been expressly authorized by the Corporation.

DOCUMENT RETENTION

The space available for storage of the Corporation's hardcopy and electronic documents is both limited and expensive. In addition, pursuant to applicable legislation, a certain number of documents must be destroyed, erased, or made anonymous when no longer required because the purpose for which they were compiled or kept has been fulfilled. On the other hand, there are legal requirements that certain records be retained for specific periods of time.

Whenever it becomes apparent that documents of any type will be required as evidence in connection with a lawsuit or government investigation, all such documents must be preserved, and ordinary disposal or alteration of documents pertaining to the subjects of the litigation or investigation should immediately be suspended. In case of doubt regarding whether documents should be preserved because they might relate to a lawsuit or investigation, the Employees in question should contact the Risk and Ethics Officer's local representative. There are also other laws and implementing regulations which could require that documents be retained and not destroyed.

DECIDING WHETHER TO KEEP OR DESTROY A DOCUMENT?

Employees who are unsure about the need to keep or destroy particular documents should consult their immediate supervisor to determine if the documents in question are still useful or if there is a legal obligation to retain them for a given period of time. In the latter case, the Risk and Ethics department may also be consulted.

REPORTING SUSPECTED NON-COMPLIANCE WITH THE CODE

GENERAL POLICY

Employees with information on potential non-compliant conduct of the Corporation or of any Employee under this Code or under any applicable legislation or implementing regulations must report the situation in accordance with the instructions provided below. Employees are required to come forward with any such information, without regard to the identity or position of the suspected offender. The Corporation will treat the information in a confidential manner and will seek to ensure that there is no retaliation against anyone for making a report in good faith. All Employees have a duty to report any known or suspected violation of the Code.

ANONYMOUS REPORTING

Cases involving questionable financial reporting, as well as known or suspected cases of fraud, dishonest activities or conflicts of interest, may be reported anonymously by phone or via the Internet. The information will be processed by an independent party (the Vice President of Internal Audit) who will be required to advise the chairman of the Audit Committee. This situation is covered by relevant internal procedures, including the whistleblowing service procedure, which is available on the Corporation's web and intranet sites. The reporting party need not identify him/herself and, as such, may remain anonymous.

INVESTIGATION

Employees are expected to cooperate fully with any investigation into reported violations.

CONFIDENTIALITY

To the extent that it is practical and appropriate under the circumstances to protect the privacy of the individuals involved, the identity of anyone reporting a suspected violation or participating in an investigation will remain confidential.

PROTECTION AGAINST RETALIATION

Any form of retaliation against someone who reports a violation of the Code, a law or regulation or who cooperates in the investigation of a reported violation, is itself a serious violation of the Code, even if it is subsequently determined that the report was unfounded (provided it was made in good faith). Acts or threats of retaliation must be reported immediately so appropriate disciplinary measures may be taken against those involved.

REPORTING VIOLATIONS TO THE CODE

CONFIDENTIAL BUSINESS CONDUCT HOTLINE

Please refer to the list below to find your local free phone number.

CONFIDENTIAL E-MAIL

wsp@expolink.co.uk

INTERNATIONAL FREEPHONE NUMBERS

COUNTRY	FREEPHONE ACTIVE	FREEPHONE NUMBER
Argentina	Yes	0800 6662603
Australia	Yes	1800 121 889
Austria	Yes	0800 281700
Bahrain	Yes	80004475
Bangladesh	Yes	Caller dials 157-0011 then will either get through to the operator or hear a recorded message which will prompt them to dial 8779167615
Belarus	Yes	882000 730028
Belgium	Yes	0800 71025
Brazil	Yes	0800 891 8807
Bulgaria	Yes	00800 110 44 74
Canada	Yes	1888 268 5816
Chile	Yes	123 002 004 12
China Netcom (North)	Yes	10800 852 2112
China Telecom (South)	Yes	10800 152 2112
Croatia	Yes	0 800 222 845
Columbia	Yes	01800-944 4796
Costa Rica	Yes	08000440101
Cuba		Caller dials 2935 then will either get through to the operator or hear a recorded message which will prompt them to dial 8779167615
Cyprus	Yes	800 95207
Czech Republic	Yes	800 142 428
Denmark	Yes	8088 4368
Egypt	Yes	0800 000 00 23
Estonia	Yes	800 00 44 265

COUNTRY	FREEPHONE ACTIVE	FREEPHONE NUMBER
Finland	Yes	0800 116773
France	Yes	0800 900240
Germany	Yes	0800 182 3246
Greece	Yes	00800 441 31422
Hawaii	Yes	1866 293 2604
Hong Kong	Yes	800 930770
Hungary	Yes	06800 14863
Iceland	Yes	800 82 79
India	Yes	000 800 440 1286
Indonesia	Yes	001 803 0441 1201
Ireland	Yes	1800 567 014
Israel	Yes	1809446487
Italy	Yes	800 783776
Japan	Yes	00531 78 0023
Kazakhstan	Yes	88003333524
Kenya	Yes	0800 723 132
Korea (South)	Yes	00308 442 0074
Latvia	Yes	8000 26 70
Lithuania	Yes	8800 30 444
Luxembourg	Yes	8002 4450
Malaysia	Yes	1800 807055
Malta	Yes	800 62404
Mexico	Yes	01800 123 0193
Netherlands	Yes	0800 022 9026
New Zealand	Yes	0800 443 816
Norway	Yes	800 14870
Oman	Yes	80077686
Pakistan	Yes	00800 900 44181
Paraguay	Yes	0098 0044 10168
Peru	Yes	080053611
Philippines	Yes	1800 1442 0076
Poland	Yes	00800 441 2392
Portugal	Yes	800 880 374
Puerto Rico	Yes	1866 293 1804
Romania	Yes	08008 94440
Russia	Yes	810 800 2058 2044

COUNTRY	FREEPHONE ACTIVE	FREEPHONE NUMBER
Saudi Arabia	Yes	800 844 0172
Serbia	Yes	0800 190 603
Singapore	Yes	800 4411 140
Slovakia	Yes	0800 004461
Slovenia	Yes	0800 80886
South Africa	Yes	0800 990520
Spain	Yes	900 944401
Sri Lanka	Yes	011 244 5413 (dialling from Colombo omit 011)
Sweden	Yes	0200 285415
Switzerland	Yes	0800 563823
Taiwan	Yes	0080 10 44202
Thailand	Yes	001 800 442 078
Trinidad and Tobago	Yes	18002037122
Turkey	Yes	00800 4463 2066
United Kingdom	Yes	0800 374199
UAE (United Arab Emirates)	Yes	8000 44 138 73
Uruguay	Yes	00040190882
United States	Yes	1877 533 5310
Venezuela	Yes	0800 100 3199
		120 11527
Vietnam	Yes	*alternatively, use non-freephone number 844 581022 (Local rates apply – expenses associated with the use of this number are reimbursable)

WHERE THERE IS NO FREEPHONE NUMBER, PLEASE COMMUNICATE IN THE FOLLOWING MANNER:

Collect call/reverse charge number steps as follows:

- Caller dials their country operator;
- Asks for an international collect call or reverse charge to 0044 1249 661 808;
- Operator will dial the number and speak to an Expolink Operator, who will accept the call and charges,
- Country operator connects caller to Expolink, leaves the call and then the call takes place as normal.

WSP | Parsons Brinckerhoff in the UK

Environmental Policy

WSP | Parsons Brinckerhoff UK is dedicated to ensuring that environmental awareness resides at the heart of every part of our operations. Our senior management are committed to acting in an environmentally responsible manner by integrating sustainability throughout our operations and supporting our clients in the design and implementation of innovative solutions in the built and natural environments. As a minimum we will comply with all relevant legislation, other requirements that we subscribe to, or those reasonably specified by our clients.

Effectively identifying and managing our direct and indirect environmental aspects and risks is the responsibility of all employees within WSP | Parsons Brinckerhoff UK and to achieve this we will:

- Ensure an effective environmental management system is maintained to meet or exceed the requirements of this policy.
- Identify and manage our environmental impacts to protect the environment, prevent pollution and continually improve our environmental performance.
- Set and review environmental objectives annually in support of our sustainability commitments, communicate these to all employees, and monitor and report on progress.
- Aim to reduce our environmental impact in relation to business travel, resource consumption, waste and carbon emissions wherever possible.
- Ensure an appropriate level of resource and funding to support this policy.
- Communicate the importance of managing our environmental aspects both directly and in respect of the services we provide.

Our senior management and leadership will:

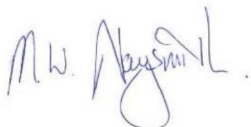
- Identify and commit to reduce their direct impacts on the environment through monitoring, setting and sharing their smart targets.
- Provide employees with information and tools to assist with providing an appropriate environmentally positive solution as part of their service delivery.
- Foster a culture of responsibility and innovation to protect the environment through leadership and engagement.
- Promote continual improvement through feedback and recognition to employees for their innovative contribution to this policy.

Employees are encouraged to have a responsible attitude to the environment through their own actions and the services they provide to our clients and can contribute to the delivery of this policy by:

- Proactively engaging with WSP | Parsons Brinckerhoff UK led environmental and sustainable initiatives.
- Committing to reducing their individual impact on the environment and working with clients to select viable environmental and sustainable solutions.

We look forward to working with our employees, clients and partners to deliver the vision and objectives set out in this policy.

We will review and update this policy on an annual basis, or more frequently if necessary.



Mark Naysmith
UK Chief Operating Officer & Managing Director

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