



Code of Business Ethics and Conduct

AUGUST 2024

Application and Responsibility

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Statement of Principles

Act with Integrity

Follow the Law at All Times in All Places

Compete Fairly and Honestly

Embrace Diverse Backgrounds and Perspectives and Treat People with Dignity and Respect

Protect Health, Safety, and the Environment

Avoid Conflicts of Interest

Protect Confidential Information and our Intellectual Property

Comply with Government Contracting Rules

Keep Accurate Financial Books and Records

Comply with Trade Regulations

Do Not Accept or Make Unlawful or Inappropriate Payments or Gifts

Application

This Code applies to all HDR officers, directors, managers and employees worldwide.

Responsibility

As HDR employees, we are responsible for the company's reputation for excellence and integrity.

Because HDR is incorporated in the United States, many US laws apply to HDR employees globally in addition to local laws. Each one of us is responsible for complying with all applicable laws.

We are all responsible for reading, understanding and complying with this Code and applicable HDR policies.

Supervisors are responsible for modeling ethical behavior and for encouraging open communications of concerns without fear of reprisal. You are critical in establishing our culture of integrity.

SPEAKING UP

One of the most important things each one of us can do to contribute to HDR's ethical culture and to protect it is to inform the company of any potential misconduct.

We welcome your concerns and you will not be retaliated against for raising them. HDR has a Speaking Up Anti-Retaliation Policy (Whistle Blowing) that reinforces our longstanding commitment to our employees that if they speak up, HDR will protect them from retaliation.



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- Act with integrity.
- Follow the law at all times and in all places.
- Compete fairly and honestly.
- Embrace diverse backgrounds and perspectives and treat people with dignity and respect.
- Protect health, safety and the environment.
- Avoid conflicts of interest.
- Protect confidential information and our intellectual property.
- Comply with government contracting rules.
- Keep accurate financial books and records.
- Comply with trade regulations.
- Do not accept or make unlawful or inappropriate payments or gifts.

We set forth policies and procedures to protect our integrity. HDR policies and procedures apply to all employees. We expect our employees to review and understand all policies and to elevate policy-related questions or concerns.

In addition, we require third parties to comply with HDR requirements in the Third Party Code of Business Ethics and Conduct.



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Having integrity means doing the right thing for the right reasons even when nobody is watching. It means demonstrating the courage

of one's convictions even if there is tremendous pressure to do otherwise.

We act with integrity by being honest and truthful in all our dealings and not deliberately misleading or deceiving others. We safeguard our ability to make independent, professional judgments by scrupulously avoiding undue influences and conflicts of interest. Many HDR employees have professional licenses and certifications that require adherence to the highest level of integrity in all of their activities.

Employees are responsible for maintaining their individual licenses in the jurisdictions where they work and to not perform licensed services in jurisdictions where they are not licensed.

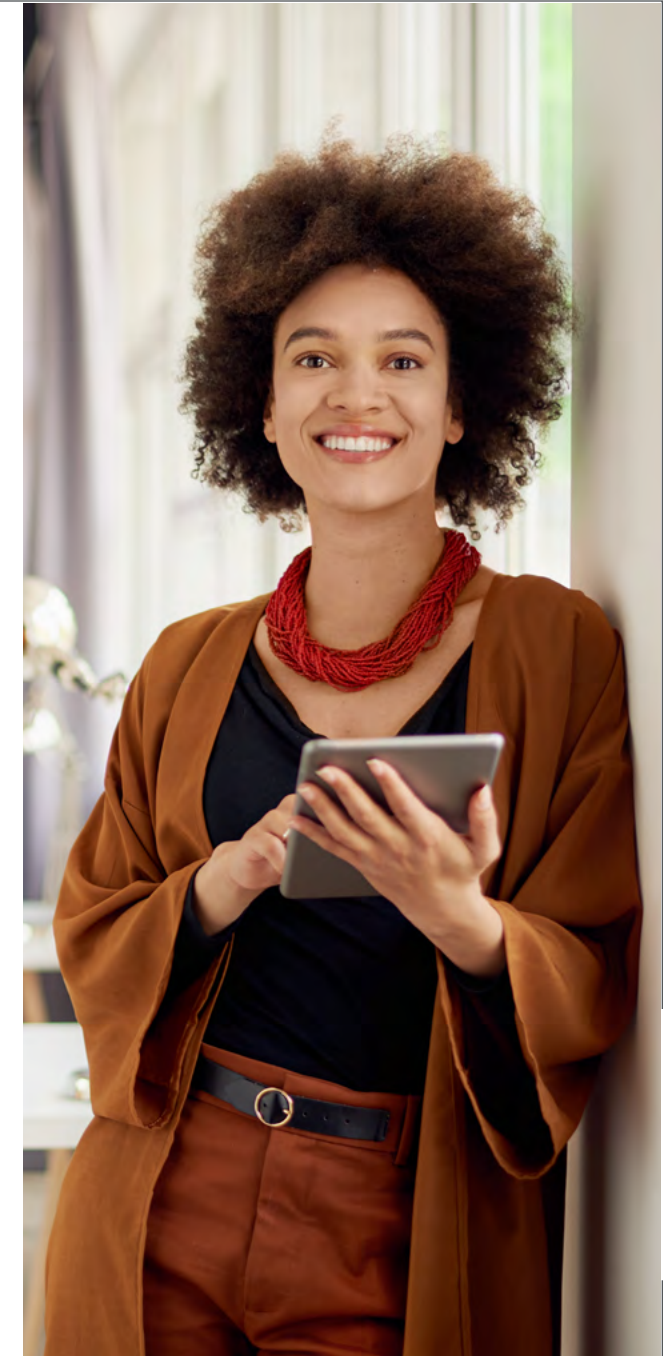
We expect our professionals to meet these requirements, including:

- Only act in the capacity for which you are licensed where you are licensed.
- Keep your licenses current.
- Adhere to the licensing board's rules and regulations.

OUR CODE IS MORE THAN A SET OF RULES

We adhere to these standards in all that we do. Managers demonstrate integrity in their day-to-day interaction with team members, clients and business partners. They immediately intervene to prevent ethical problems. They require their team members to review and understand this Code and to adhere to other good ethical business practices.

We honor this Code as more than a set of rules. It is a guide that shows us what our commitments are. These include acting in good faith, communicating openly and seeking fair outcomes. We ask questions, raise concerns and call attention to problems.



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HDR will comply with the letter and spirit of all laws and regulations. Being 100% compliant with the law of the land, wherever that land may be, is HDR's minimum standard. We are either 100% compliant or we have failed. There is no middle ground. Laws don't cover everything. We want to continue to be the company we have been since our founding, which is a company that does the right things for the right reasons.

GLOBAL APPLICATION

In many cases, laws apply to HDR and its employees wherever they are in the world. Examples of such laws include U.S. laws that forbid the payment of bribes to gain unfair business advantages, impose trade sanctions on particular countries forbid anti-competitive behavior, and United Kingdom laws that prohibit the payment of bribes anywhere in the world in both public and private sector jobs.

When HDR's work is outside the U.S., we will follow the laws and regulations of both the United States and the countries where we operate.

GOVERNMENT EMPLOYEES

We need to be very cognizant that former government employees often have restrictions on who can hire them and when and what work they can perform once hired. Approaching government officials to offer employment can have significant impacts on the individual and our projects.



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We compete in accordance with the rules at all times whether we are dealing with competitors, governments or business partners.

We do the right things for the right reasons. We deliver our best work by designing smart. We push the boundaries of creativity, innovation and design, but we never push the boundaries of fair play.

A good rule of thumb is to avoid taking any action on behalf of HDR that you would not be comfortable explaining publicly or to senior management.

THIRD PARTIES

It is a dangerous misconception that third parties can circumvent the law or ethical considerations on our behalf. The opposite is true; we will be held liable for their actions.

Before we rely on third parties to represent us, we will conduct due diligence on them and set forth our ethical standards with which they must comply, and we will monitor their compliance with those standards.

HDR will treat all competitors, business partners and clients fairly and honestly, while working hard to outperform the competition on an ethical basis.

CONTRACTUAL COMMITMENTS

Although we operate in many different places where cultural practices and legal systems differ, there are no exceptions to competing fairly and honestly at all times.

- We do not promise, offer, or pay bribes or give anything of significant value to private individuals or their family members for any reason.
- We do not promise, offer, or pay bribes to government employees or their family members for any reason.
- We do not use the confidential information of others to gain improper advantage.
- We do not collude with our competitors to set pricing, divide territory or obtain any other anticompetitive objective.
- We do not mislead others or compromise our integrity to gain an advantage.
- We do not disparage our competitors or their products or services. We speak truthfully about the great work HDR does.
- We do not use industry conferences or organizations to discuss anti-competitive topics.
- We do not use pricing, cost, or strategic information that we receive from joint venture partners in the course of forming or operating as a joint venture for any purpose outside of the joint venture.

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WHAT WE BELIEVE

HDR is our company. Together, we build on each other's life experiences and perspectives to make great things possible every day. This shapes our collaborative culture, encourages organizational trust and connects us closer to the clients and communities we serve.

OUR COMMITMENT

As employee-owners, we all have a role in creating an inclusive environment where each of us is welcomed, valued, respected and empowered to bring our authentic selves to work every day.

EQUAL OPPORTUNITY

HDR wants all the people who work for HDR or in HDR facilities to feel safe, included and valued, and feel empowered to put forth their best effort for the company and to bring their whole selves to work.

We provide equal opportunity and fair treatment for all. HDR prohibits discrimination or harassment based on ancestry, race, color, sex, sexual orientation, genetic information, religion, national origin, age, creed, veteran status, citizenship status, marital status, public assistance, disability status, Vietnam Era Veteran, recently separated, special disabled, and other protected veterans or any other basis prohibited by law. For this reason, as well as to comply with the laws, HDR strictly forbids discrimination, harassment and retaliation.

SPEAKING UP

We urge and expect employees who experience mistreatment or who have ethical concerns to speak up, and we protect them from retaliation when they do. As well as being illegal, it is unfair and unproductive to allow a culture of inequality to develop

that makes any of our valuable employees or anyone with whom HDR interacts or works feel excluded, discriminated against, harassed or unable to be their best because of their status or others' perception of that status.

We respect human rights around the world, and we treat our employees and other stakeholders with dignity. We comply with all laws, we respect employees' right to freedom of association, we adhere to fair employment practices, and we treat employees fairly and honestly.

We do not tolerate child or forced labor, human trafficking, or the procurement of commercial sex acts anywhere in the world, and we do not conduct business with any company that does.



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We are committed to providing safe and healthy working conditions for our employees, and we will comply with all environmental and safety laws and regulations.

We are also committed to making environmental sustainability our desired way of doing business and helping create lasting change that will benefit our clients, communities, and the environment.

We know that considering these factors can lead to better projects and greater value for our clients.

SUSTAINABLE SOLUTIONS

We champion balanced sustainable solutions, resulting in sound choices that:

- Are resource-sensitive.
- Provide private and public-sector opportunities for economic growth and development.
- Create quality and diverse places.
- Promote social equity.
- Consider the broad context of our decisions.

HEALTH & SAFETY

We need to manage office and project site hazards and provide proactive solutions to prevent harm from exposure to these hazards. We need to report and investigate all injuries, property damage and environmental incidents and take corrective actions to minimize future events.

We comply with HDR's drug and alcohol policies and all other HDR health and safety procedures. HDR has established training and processes for preventing and addressing workplace violence. All employees are expected to adhere to these policies and procedures. Meeting these objectives is an ethical responsibility we take seriously, and we expect each employee to do the same.



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As employees of HDR, we have a duty to pursue the company’s best interests. Our individual and collective best interests are served when each of us acts without being under undue influence or having conflicting duties.

Two types of conflicts can arise — organizational and personal.

ORGANIZATIONAL CONFLICTS

- When we do regulatory work for a government agency, such as the EPA, and we also work for a company being regulated by that entity;
- When we have multiple types of relationships with the same third party, such as when we’re working for a company that’s also working for us on another job, either sequentially or simultaneously; and
- When two parties with whom we have relationships have competing interests and our decision making or job performance is, could be, or appears to be impacted by those competing interests.

PERSONAL CONFLICTS

- When employees or their family members have outside business or personal interests whose goals conflict with HDR’s or when they have business relationships with HDR;
- When employees accept benefits from vendors seeking to curry favor and the feeling of or at least the appearance of indebtedness results;
- When employees engage in outside activities that cast HDR in a negative light; and
- When employees directly supervise their family members or direct activities that can benefit or injure family members.

HDR values its employees’ involvement in civic affairs including through representative government. However, participation in civic affairs can create conflict of interest concerns.

To avoid these types of situations, HDR requires employees obtain the company’s approval before seeking or being nominated for public office.

All employees are required to disclose conflicts of interest upon their hire, when they recognize them, and assess them annually.



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Clients look to us because they can trust us, and we are proud of that trust and guard it closely. It could erode that trust quickly if we disclosed a client’s confidential information, either accidentally or deliberately. Each of us is responsible for handling clients, business partners and our confidential information properly so that we can sustain the trust we have worked so hard to establish. How to protect our confidential information is listed to the right.

If someone tries to give you confidential information you are not authorized to receive, do not accept it. HDR’s intellectual property is one of our most important products, but its value exists only so long as it is protected. Following the rules and using caution when working with intellectual property protects the investment of each employee owner and helps ensure the longevity and profitability of the company.

Using confidential information for personal gain, for purposes unrelated to one’s work, or in a way that conflicts with the interests and values of HDR or its clients would violate the fundamental ethics that we value and put HDR’s reputation and its clients’ trust at risk. No HDR employee or business partner may trade on material non- public information in the marketplace, nor may they communicate such information to anyone else for any unauthorized purpose.

DATA PROTECTION

Know that our vigilance in protecting our data extends to being alert for phishing emails, smishing texts, social engineering campaigns, and not clicking on links from unknown senders and much more. Erring on the side of caution is always the better approach.

INTELLECTUAL PROPERTY

We must comply with intellectual property rights of third parties and not engage in unauthorized reproduction or transmission of copyrighted material or software.

EMPLOYEE PRIVACY

We believe in protecting the privacy of your personal information and will comply with the laws of the various jurisdictions that have passed laws governing the distribution of that information. We work to protect the privacy of our employees, no matter where they live or work. Personal information may be used or disclosed only if the disclosure is authorized in accordance with applicable law and HDR’s policy. If you are entrusted with personal information, you must protect its confidentiality, use it only for the reasons it was provided to you, and keep it secure.

SOCIAL MEDIA

Social media, like any media, offers both benefits and the potential for harm. HDR has established requirements for employees to follow in using social media, particularly with respect to references to HDR projects, positions, and reputation.

PROTECTING CONFIDENTIAL INFORMATION:

- Protecting the information technology systems and physical locations where the information is stored.
- Adhering to non-disclosure and contract data security requirements including those that restrict the storage of and portage of client information.
- Knowing and complying with document retention requirements.
- Using the property, confidential information and intellectual property of HDR and our clients in the best interests of both the company and the clients.
- Not disclosing employee personal information except as authorized by HDR.
- Following the rules for media interaction.
- Safeguarding and producing information that is subject to litigation, internal investigation, or audit.
- Obeying rules associated with U.S. Government information.

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We value the U.S. Government, other countries' governments and many state and local governments as long-standing and important clients. Each of these clients, but especially the U.S. Government, has contracting rules in place to make sure it uses the taxpayers' money wisely. We comply with those rules, because doing so is the right thing to do and failing to comply could result in fines, penalties, and, in extreme cases, suspension or even debarment from pursuing work with that client.

INSIDER INFORMATION

When working on some US government projects, it can be necessary for employees to access, create or store information that has a national security classification. HDR has designated employees who have proper security clearance to access secure information. All employees are responsible for preserving HDR's ability to obtain access to such information.

MANDATORY DISCLOSURE OF VIOLATIONS

All employees are expected to report concerns related to potential violations of internal procedures, this Code, and laws, regulations and ordinances. If fraud, conflict of interest, bribery, or gratuities are suspected under U.S. Government contracts, HDR must disclose these matters to U.S. Government officials, including the Inspector General and Government Contracting Officers.



Keep Accurate Financial Books and Records

Fiscal responsibility is a critical part of helping HDR reach its goals. It is essential that all financial books and records are accurate, complete, and kept according to company policy.

FINANCIAL RESPONSIBILITY

Accurately and honestly provide information in business reports and records including those relating to your educational qualifications and work experience and those relating to certifications and test results.



Always accurately report your work hours and use the correct charge code on all time records.



Always submit accurate expense reports for expenses actually incurred and associated with the work activity.



Always submit accurate invoices to clients that accurately reflect the work or services performed and the expenses incurred.



Maintain project records and other business records in accordance with HDR's policy, which provides consistent business practices for when to retain or discard HDR records consistent with legal and contractual requirements.



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EXPORT CONTROLS

Working in foreign territories comes with additional compliance risks, including export controls. Many governments regulate and control the export and transfer of certain goods and services, and when we do business in these countries, we must comply with these additional regulations.

The U.S. Government’s export regulations are particularly concerned with goods that are national defense-oriented or that could be put to a military use even if they’re originally intended for a civilian use (so-called “dual use”). The U.S. Government export regulations control even the technology, technical drawings, specifications, software or data needed to manufacture or supply those goods and services.

HDR is committed to being a good citizen of each country in which it conducts business and therefore will comply fully with these laws.

TRADE RESTRICTIONS

HDR will comply with sanctions enacted by the U.S. Government, the [United Kingdom](#), and other countries and with applicable regulations prohibiting trade with certain countries and entities.

These sanctions cover nations such as Syria and North Korea, known terrorist entities, and prohibitions on supporting certain nations’ boycott of Israel. They may also apply to foreign nationals working within the United States and HDR employees who are foreign nationals.

Sanctions are updated periodically by the U.S. State Department and other global governments.



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While employees must be sensitive to cultural differences everywhere HDR operates, the company always expects employees to conduct business ethically and in accordance with company policy.

ANTI-CORRUPTION

HDR takes a strong stand against corruption. It is illegal, it stunts economic growth and development, and it warps the business and political environments where it is tolerated. HDR competes fairly, relying upon the innovation and skill of our employees. HDR will refuse all business opportunities that compromise this principle. Accordingly, HDR's Anti-Corruption and Anti-Bribery policy mandates that no person or entity associated with the company shall offer, pay, promise to pay, or give money or anything of value, directly or indirectly, to any person to obtain or retain some business advantage or authorize another to do the same.

NO 'GREASE' PAYMENTS

HDR employees shall not pay so-called facilitation or "grease" payments to individuals, including government officials. These fees are normally small payments not provided for by law that are

requested by individual government employees to speed up the issuance of some government document or permission, such as a visa or a license. Expediting payments that are part of a government's published fees or an entity's business processes are allowed.

HDR employees shall not make false or misleading entries in the company's books and records to conceal the nature of any payments or gifts of anything of value.

GIFTS, TRAVEL AND ENTERTAINMENT

Only reasonable, business-related gifts and travel and entertainment benefits may be provided to a client or received from a business partner and only when that partner does not have specific prohibitions, as the U.S. Federal Government and many state and local governments and governmental clients outside the U.S. do.

Commercial clients also have restrictions, which we must recognize and manage at the project level. Neither the intent nor the effect of giving or receiving gifts, travel, dining, and entertainment may be to improperly influence a business decision.

Also, such benefits should be infrequent and reasonable under the circumstances. If someone could reasonably say that the gift or entertainment is too lavish, you should not give the benefit to a client or accept it from a business partner until and unless you get prior approval.

POLITICAL AND CHARITABLE CONTRIBUTIONS

HDR's policies govern all charitable and political donations made with corporate funds. No corporate funds may be used to make such contributions without compliance with that policy. HDR prohibits employees from making such contributions with personal funds to gain an improper business advantage for the company or otherwise circumvent company policy. HDR does not permit third parties to make contributions of any sort on behalf of the company, whether in the U.S. or abroad.

HDR encourages its officers and employees to be informed voters and to be involved in the political process. Individual participation in political activities, including contributions of time or financial support, is a personal decision and

will be entirely voluntary, except in jurisdictions where employees' political contributions above a certain limit trigger a prohibition on contract awards to their employers.

HDR maintains a list of these jurisdictions, included in the policy, and asks that employees determine if their jurisdiction falls in this category and, if so, restrict their contributions accordingly.

THIRD-PARTY BUSINESS PARTNERS

HDR relies on the services of third-party business partners, ranging from suppliers of goods and services to intermediaries who represent the company legally. HDR's reputation is tied to the quality of the business partners we choose. The company must conduct sufficient due diligence of its business partners and seek relationships with only the best and most qualified.

As a minimum, we expect all business partners to agree and live up to the principles in HDR's Third Party Code of Conduct. Having a Code that is substantially similar to ours demonstrates this commitment.