

A large yellow geometric shape, resembling a stylized arrow or a trapezoid with a pointed top, occupies the central and right portions of the page. It is filled with a solid yellow color and has a white border.

# **Our Code of Integrity and Business Ethics**



## A message from Richard Steer

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As Gleeds has grown and evolved as a global company, much has changed. But one constant continues to be a vital part of our culture – our commitment to integrity and ethical behaviour.

We have succeeded in earning our clients' trust by delivering outstanding customer service and fully committing to acting ethically in all that we do. Integrity, our paramount core value, guides us as we conduct our business around the world.

Each of us is obligated to act with the highest degree of integrity and in full compliance with the law.

To help us understand the ethical and legal guidelines that must direct our business activities, we rely upon our "Code of Integrity and Business Ethics" and update it periodically so that it remains timely and relevant to our work. Our Code is not a substitute for good judgment, nor does it cover every situation that you may encounter or every law that applies to us as a global company. It does, however, outline the basic legal guidelines that we must follow and the general ethical principles that will help each of us make the right decisions when conducting business on Gleeds' behalf worldwide.

If you find yourself in a situation in which you are unsure how to act, believe that a violation of the Code could or has occurred, or have a question about an issue, please seek assistance. Our Code contains several resources that you may use to resolve or report any issue related to ethics and compliance without fear of retaliation. You can be assured that the company will help and assist you in doing the right thing.

Continuing to conduct our business in an ethical manner will help ensure long-term success for Gleeds, our employees, clients, business partners and owners. You have my personal commitment that I will do all I can to ensure that the Code is observed and honoured at every level of our renowned company.

Thank you for your continued dedication to Gleeds and for your commitment to our culture of integrity and ethical behaviour.

Sincerely,

A handwritten signature in black ink that reads "Richard Steer". The signature is written in a cursive, flowing style.

Richard Steer

Chairman of Gleeds Worldwide

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A blurred office scene with people working at a desk. A large yellow triangle is overlaid on the image, containing the text 'Introduction'.

# Introduction



## WHY WE HAVE A CODE OF INTEGRITY AND BUSINESS ETHICS?

Integrity and ethics are fundamental to everything we do.

Our Code of Integrity and Business Ethics, or the Code, sets out Gleeds' commitment to integrity and ethics in everything we do. Gleeds believe in the principle of one Gleeds, one Code. This means that Gleeds expects everyone in the company to read, understand, and follow the Code.

Although the Code covers a wide range of practices and procedures, it cannot address every situation you may encounter. It is a guide to your responsibilities and helps you use your judgement and common-sense in making the right decisions.

### Making the right decision

The Code helps us all make informed decisions and tells us where to go for more information.

Some decisions are easy to make. However, whenever we are unsure of any work-related actions or decisions, we must ask ourselves the following questions:

- Does it comply with Gleeds' values and with our Code and its underlying policies?
- Is my action legal?
- Does it conform with diversity and inclusion best practice?
- Is it fair, ethical and morally acceptable?
- What is my "gut feeling" telling me?
- How would it look if it were reported on the news or in another public forum? Would my reputation or Gleeds be negatively affected?
- Could someone perceive this as a conflict of interest?
- Could my action (or inaction) put anyone's health, safety or well-being at risk?

If the answer to any of the above questions is not clear and obvious, or if we are uncomfortable with our answer, you must seek guidance from either your line manager, a Business Unit Director, a People Partner, or a Director within the Risk & Compliance Directorate.

You will never face retaliation for seeking guidance or making a good faith report.

## HOW THE CODE APPLIES TO YOU

### Who does the Code apply to?

Our Code applies to all our employees and temporary employees at all our business locations around the world.

### What it means in practice

Our Code sets out what is expected of you as a Gleeds' employee, providing explanations and guidance in every section, designed to help you meet those expectations. It also describes what you can expect from Gleeds as a company, and what you should expect from each other.

Working within these expectations is crucial to our success and will ensure our company has a reputation we can all be proud of.

Managers are responsible for providing leadership and support for their teams to understand the requirements of this Code and how it applies to them in practice. Senior managers are also responsible for providing assurance in these matters to the Gleeds' Boards of Directors.

But rules only take human beings so far. So, our Code requires you to 'Think' – to follow the spirit of the Code, not just to the letter, but also to apply these principles and ask what's right.

If in doubt, always ask!

At Gleeds, that's part of your job ...

### Once you've read this Code, you will:

- Understand what is expected of you as a Gleeds' employee.
- Understand the importance of caring and behaving the Gleeds' way.
- Understand the consequences of not behaving the Gleeds' way.
- Know how and when to report any issues that you feel contravene our behaviours and feel empowered to do so.
- Know where to go for further information, advice and support.

## Failing to comply with our Code

The consequences of not complying with this Code can be very serious including damage to our reputation, significant fines and penalties, and even criminal liability for individuals or the company.

Any failure to comply with this Code or its supporting policies will be investigated, and appropriate action taken. Depending on the circumstances, this may include training, discipline, or other corrective action, up to and including termination of employment.

## SPEAK UP

If you see behaviour at work which you feel may be a breach to our Code or seems illegal or unethical, please report it.

You must report any behaviour which you suspect to be unlawful or criminal. This could be bribery, fraud, price fixing or a breach of data privacy or confidential information.

You must also report abuse to our systems, processes or policies. This could be bullying or harassment, potential conflict of interest, danger to health and safety of employees or the public, potential abuses of human rights or serious environmental issues.

Gleeds has a non-retaliation policy for when a genuine concern has been reported. No action will be taken against you if you report such concerns, even if proven to not result in a compliance breach.

## What does this mean to me?

There are three ways to speak up:

### 1. Report it to your line manager:

We know it is not always easy to raise your concerns. To make it easier, we have an open communications policy, so we encourage you to discuss any issues or potential issues that concern you with your line manager.

### 2. Report it your local People Partner:

If it's not appropriate to discuss the issue with your line manager, you should discuss the matter with your local People Partner.

### 3. Report it confidentially to the Risk & Compliance Directorate:

You may wish to report your concern to someone who is further removed from the situation. There may be occasions when reporting a concern to either your line manager or local People Partner is not appropriate, or it doesn't feel like the right approach. All employees, customers, sub-consultants and suppliers have access to the Risk & Compliance Directorate.

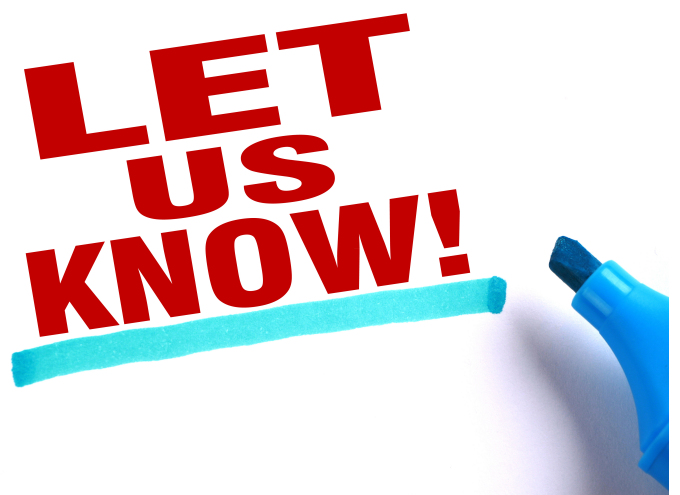
Click 'Speak Up' on the intranet to make a report online.

Call a Risk & Compliance Director.

## What happens next?

The steps below outline what we do when someone raises a concern:

- When you raise a concern, a decision will be made as to which area will progress the matter – Business Unit Heads, the People Department, the Risk & Compliance Directorate or Gleeds' legal advisers.
- We will then contact the person raising the concern to ensure we have all the information we need and talk through the next steps.
- If we decide to proceed with an investigation, a qualified expert will investigate, keeping the person who raised the concern informed throughout the process.
- We will keep transparent and accurate records of all disclosures and subsequent actions.







# Section 1

**We value trust**



## INDIVIDUAL CONDUCT

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### Our principle

We value the trust our business partners, clients, sub-consultants and suppliers place in us and will safeguard the information provided to us.

### What do we mean?

Gleeds handle vast amounts of information every day. Our systems and networks which hold our clients', business partners', subconsultants', suppliers' and employees' data must be secure.

The information we use (whether written or spoken, digital or physical) needs to be protected so that we can be sure of its:

- **Confidentiality:** information is not disclosed to unauthorised people.
- **Integrity:** information is accurate, complete and authentic.
- **Availability:** information is accessible when we need it.

### What does it mean to me?

We expect you to follow these simple steps to safeguard and protect the information provided to us:

#### 1. Value information and classify it

- **Confidential:** critical information that could affect our company.
- **Restricted:** sensitive information that we only share on a need-to-know basis.
- **Internal:** day-to-day information that we share with colleagues and authorised third parties.
- **Public:** information that we share with the public.

#### 2. Clear your desk and lock your screen

- Lock your screen if you leave your computer unattended and ensure that information classified as Confidential and Restricted is securely stored if you leave your desk.
- Switch off your computer/laptop at the end of the day.
- Clear your desk when you leave for the day.
- Store 'Confidential' and 'Restricted' classified information correctly and dispose of it securely when it is no longer needed.

#### 3. Protect your passwords

- Do not share your password with anyone or write it down.
- Do not let your computer 'remember' your passwords.
- Choose passwords that contain at least eight characters with a mixture of upper case, lower case letters, numbers and special characters.

#### 4. Think before you click

- Be careful when opening attachments from unknown email addresses.
- Only use authorised software.
- Do not click links which may take you to unsafe websites.
- Do not use our systems for anything obscene, indecent, offensive, defamatory, illegal or otherwise inappropriate for the workplace.

#### 5. Always protect information

- Always look after laptops and other work equipment when you are not in the office.
- Avoid leaving original documents on printers, photocopiers and multi-functional devices (MFDs).











## Section 2

**We act honestly**

## FRAUD, DECEPTION AND DISHONESTY

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### Our principle

We will not defraud or deceive anyone or act dishonestly, and we will protect the company against fraud.

### What do we mean?

#### Fraud

Though precise definitions vary from country to country, fraud always involves deception and dishonesty.

It is fraud when you deliberately try to deceive someone, act dishonestly or abuse your position to gain any kind of material advantage or use or involve anyone else to do so. Fraud is usually carried out for profit, or to obtain money, property or services unjustly. It can involve defrauding the company or a third party.

Fraud is a criminal offence in most countries. In some countries, like the United Kingdom and the United States, you can, in certain circumstances be prosecuted just for being careless or reckless in letting it happen, even though you did not deliberately set out to commit fraud yourself.

### Company property or resources

Gleeds' property and resources include both physical and intangible assets.

Physical assets are things like equipment, supplies and cash.

Intangible assets include information, intellectual property, brand value and employee time and talents.

### What does it mean to me?

#### We expect you to:

- ✓ Protect Gleeds' reputation – each one of us is a representative of Gleeds.
- ✓ Act honestly, fairly and openly.
- ✓ Make sure our books and records are accurate, complete and not misleading.
- ✓ Carefully check or inspect things that are our responsibility.
- ✓ Base all invoices on clear and complete information and check they comply with contractual arrangements.
- ✓ Take great care when spending the company's money or making financial commitments on its behalf.

#### You should never:

- ✗ Defraud or deceive anyone or act dishonestly.
- ✗ Falsify our company expenses or claim from the company for expenses that have not been properly incurred in carrying out company business.
- ✗ Use the company's money or resources for an improper purpose.
- ✗ Ignore something that you suspect might involve fraud, deception or dishonesty.
- ✗ Withhold payment when we don't honestly believe we are entitled to do so.
- ✗ Make false claims.



## BRIBERY AND CORRUPTION

### Our principle

We will not offer or accept bribes or participate in corruption.

### What do we mean?

Bribery and corruption are illegal and unethical.

An allegation of bribery or corruption can seriously damage our reputation. It is better to miss out on an opportunity than compromise our integrity.

We refuse to participate in any kind of corrupt activity, either directly or through third parties. This includes offering, giving or accepting bribes or improper payments, even if such practices are perceived as part of local business practice.

We comply with the requirements of the RICS professional statement: Countering bribery and corruption, money laundering and terrorist financing. This applies to all Gleeds' people, not just to those who are RICS members.

**Bribery** – offering, providing or receiving something of value – an unearned reward to influence someone's behaviour including cash, gifts, hospitality or entertainment – as an inducement or reward for something improper. Usually, but not always, it's to obtain or retain business or some other illegitimate advantage.

Whether they are provided to or received from public officials or private individuals, bribes are against the law and against our Code, no matter what the "local custom" may be.

**Corruption** – unlawful or improper behaviour that seeks to gain advantage through illegitimate means. Bribery, abuse of power, extortion, fraud, deception, collusion, cartels, embezzlements and money laundering are all forms of corruption.

**Facilitation payments** – (sometimes called "grease" payments) are usually small payments or gifts generally made to junior or low-level public officials to speed up or "facilitate" actions the officials are already duty-bound to perform.

The payments can appear "harmless", partly because the sums involved are usually small, and partly because they are often regarded as a part of local custom or culture –

the way things are done. However, these payments are illegal in most countries in which we operate, including the United Kingdom.

We make no distinction between facilitation payments and bribes. Any type of facilitation payment is prohibited, large or small. Even where such payments are perceived as a common part of local business practice or acceptable under local law (which is very rare), and even if our competitors engage in such practices, no violations of this principle will be tolerated. We would rather lose business than compromise our integrity.

### Coercion and extortion

There is one exception when the facilitation payment is being extorted or you are being coerced to pay it. Extortion in this context means if your safety or liberty is under threat or you feel you have no alternative but to pay for personal or family peace of mind. In these circumstances, our duty is to support you. Make the facilitation payment, record it clearly, and report it at once to the Finance Director and the Risk & Compliance Directorate.

### Legitimate fees

Sometimes a legitimate fee is payable for a speedy service provided by the government. For example, a published amount to get a visa or a new passport more quickly from a consulate. Payment of such fees is acceptable, provided there is a business need, payment is transparent and open, a receipt is obtained, and the expense is properly recorded.

### What does it mean to me?

#### We expect you to:

- ✓ Be vigilant for activities involving bribery and corruption both inside and outside of Gleeds.
- ✓ Seek to avoid even the appearance of wrongdoing. Even an allegation of bribery or corruption can seriously damage Gleeds' and/or your reputation.
- ✓ Record all payments and benefits provided to public officials.
- ✓ Report any attempts to bribe us, or to solicit bribes from us.
- ✓ Report any suspicions you have about bribery and corruption.

**You should never:**

- ✘ Offer or accept, directly or indirectly, anything that could constitute a bribe or improper payment.
- ✘ Take bribes or improper payments.
- ✘ Participate in any form of corrupt behaviour.
- ✘ Engage public officials to provide services without approval from the Global Head of Risk & Compliance.
- ✘ Conceal or fail to record accurately and completely the true nature of our activities.
- ✘ Falsify or tamper with Gleeds' books and records.
- ✘ Pay more than fair market value for services.
- ✘ Use the company's money or resources for an improper purpose.

**MONEY LAUNDERING AND TERRORIST FINANCING****Our principle**

We will not facilitate or be complicit in money laundering or terrorist financing activities.

**What do we mean?**

We take great care not to involve ourselves in anything that can give rise to the facilitation of money laundering and/or terrorist financing, or to become complicit in such unlawful activities.

Risks associated with money laundering and terrorist financing must be managed in accordance with the RICS professional statement: Countering bribery and corruption, money laundering and terrorist financing. This applies to all Gleeds' people, not just to those who are RICS members.

If you have suspicions of money laundering or terrorist financing activities, report your concerns to the relevant authorities (as specified in local legislation). Where there is no legislation, record the activity and report it to a Director within the Risk & Compliance Directorate.

In particular, we:

- Evaluate and review periodically the risks that prospective and existing business relationships present in terms of money laundering or terrorist financing offences taking place.
- Conduct appropriate checks on clients and customers.
- Record and retain information how Gleeds has met the requirements of the RICS professional statement.

**What does it mean to me?****We expect you to:**

- ✓ Report any suspicions of money laundering or terrorist financing activities to the relevant authorities (as specified in local legislation); where there is no local legislation, record the activity and report it to a Risk & Compliance Director.

**You should never:**

- ✘ Facilitate or be complicit in money laundering or terrorist financing activities.

## COMPLETE AND ACCURATE RECORDS

### Our principle

We ensure that all transactions and records relating to our business activities are complete and accurate.

### What do we mean?

Proper record keeping builds trust with clients, business partners, regulators and owners.

A record is any information created or received by an employee that is related to Gleeds' business activities. Records include both paper and electronic documents, such as emails and images.

Effective records management:

- Ensures availability of documents when needed.
- Helps Gleeds to comply with applicable laws and regulations.
- Preserves documents that may be relevant in audits, investigation and litigation.

### What does it mean to me?

We expect you to:

- ✓ Safeguard all records generated, received, or maintained in the course of business.
- ✓ Keep all documents for the length of time required by regulations and our Records Retention Schedule.
- ✓ Dispose of documents using secure means to protect confidentiality.
- ✓ Report any attempts to conceal, alter or destroy a record in violation of Gleeds' Records Retention Policy.

You should never:

- ✗ Alter or destroy records.
- ✗ Knowingly include incorrect or misleading entries in records.
- ✗ Deliberately conceal information.











## Section 3

**We respect everyone**

## RESPECT FOR PEOPLE

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### Our principle

The diversity of our people is one of our greatest assets. We embrace everyone equally and embrace difference.

### What do we mean?

We value difference and believe diversity of people, skills and abilities is a strength that helps us to achieve our best and the strength to lead in the market place. We also believe everyone should be recruited and promoted based on their personal ability, contribution and potential. We are committed to ensuring that everywhere across our company we promote, support and maintain a culture of fairness, respect and equal opportunity for all. Decisions regarding recruitment, hiring, training, promotions, transfers, and redundancies are based on merit.

We value all employees and strive for a workplace that fosters dignity and respect. At Gleeds, we believe that the differing backgrounds, experiences, and perspectives of our people give the company strength to lead in the marketplace.

### Our commitments

- To support diversity and inclusion in the workplace.
- To provide equal opportunities for all.
- To maintain a supportive, inclusive environment free from discrimination, harassment, victimisation and bullying (see bullying, harassment and discrimination, on page 24 of this Code).
- We hire the best candidate for the job and ensure that they are appropriately qualified and respect that diversity brings to our work environment.
- To promote talent based on merit.
- We comply with all employment laws.

### What does it mean to me?

#### We expect you to:

- ✓ Treat others as you would be expected to be treated yourself; openly, with respect for cultures and customs of our colleagues, and the people employed by our clients, business partners, sub-consultants and suppliers.
- ✓ Maintain the highest ethical standards.
- ✓ Promote and contribute to a positive work environment where everyone feels appreciated, respected and valued for their differences.
- ✓ Be open-minded, promote teamwork and encourage new ideas and opinions from others.
- ✓ Make constructive, two-way communication the cornerstone of our management style, actively listening to and engaging with every member of the team.
- ✓ Lead by example and be a role model for the behaviours we want others to adopt.

#### You should never:

- ✗ Display or tolerate unprofessional behaviour towards anyone.
- ✗ Introduce materials or engage in activities that are inappropriate, illegal, sexually explicit or otherwise offensive, whether in the workplace or while representing Gleeds, including during business travel.

## TRUST

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### Our principle

We want to be trusted by our stakeholders, we always treat our stakeholders and their people with integrity and professionalism.

### What do we mean?

Our stakeholders include, but are not limited to, our employees, clients, business partners, suppliers, contractors and sub-contractors, owners, governments, regulators, the people they employ and the communities where we work.

Relationships with any of our stakeholders need to be honest, transparent, professional and be conducted with integrity. This will help our stakeholders to trust us and have confidence in our business.

### What does it mean to me?

#### We expect you to:

- ✓ Work to earn trust and confidence of others to build long-lasting professional relationships with a diverse group of people.
- ✓ Meet our obligations of responsibility or trust fully and willingly.
- ✓ Select and reward people and organisations based on a fair, objective process, with clear expectations of what is required.
- ✓ Regularly evaluate our own performance and the performance of others.
- ✓ Keep our promises and fulfil contractual or other agreements openly, honestly and promptly.
- ✓ Work with stakeholders to solve disputes at the earliest stage.
- ✓ Communicate truthfully, clearly and regularly.
- ✓ Fully understand what our clients and other customers require of us.
- ✓ Do what we say we will do.

## DEVELOPING OUR PEOPLE

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### Our principle

We are committed to helping our people achieve their best.

### What do we mean?

We believe our people are our greatest asset, and developing our people is the best way to develop our company.

All our decisions about recruitment, development and promotion are made solely on ability, skills, experience, behaviour, performance and potential to do the job.

Through employing the best people and creating an environment in which they can develop we will achieve our business goals.

### Our commitments

- Creating a working environment in which all our people feel valued.
- Encouraging and supporting all our people to achieve their best.
- Identifying and satisfying training, learning and development needs, so our people can perform and develop their potential – both personally and professionally.
- A fair system of recognition, reward and promotion throughout Gleeds.
- Never denying promotion or opportunity based on any form of discrimination.
- Maintaining a safe and healthy working environment for all our people.

### What does it mean to me?

#### We expect you to:

- ✓ Take responsibility and actively contribute to your own learning and personal development.
- ✓ Speak to your line manager if you feel you are not being provided with opportunities and express your concern.
- ✓ Help others to maximise their potential.

## BULLYING, HARASSMENT AND DISCRIMINATION

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### Our principle

We do not tolerate bullying, harassment or discrimination.

### What do we mean?

We are committed to creating a working environment in which everyone is respected and can flourish equally, without fear or favour.

We do not tolerate behaviour or attitudes that support coercion, intimidation or discrimination. Whenever and wherever we observe such behaviour, we always challenge it and support others who do so.

**Bullying and harassment** refers to any action or behaviour that any individual or group finds unwelcome, humiliating, intimidating, threatening, violent, hostile or discriminatory. Employees should be particularly sensitive to actions that may be acceptable in one culture but are not in another.

**Discrimination** means treating a certain person or group based on factors such as age, race, religion, national or ethnic origin, colour, gender, sexual orientation, gender reassignment, marital status, disability unrelated to the task in hand, union membership or political affiliation. This is not an all-inclusive list and factors could vary based on the laws of where your business is located.

### What does it mean to me?

#### We expect you to:

- ✓ Speak up and do something about harassment, bullying or discrimination if you notice it in the workplace.
- ✓ Encourage and support those who challenge or report such behaviour.

#### You should never:

- ✗ Tolerate any action or behaviour that could be viewed as harassment or bullying.
- ✗ Accept any kind of unlawful discrimination.
- ✗ Make inappropriate jokes, try to humiliate a colleague, or spread gossip and rumours that might be, or could be perceived as, hurtful and disruptive.
- ✗ Threaten a colleague with physical or verbal violence.



## HUMAN RIGHTS

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### Our principle

We respect and protect human rights.

### What do we mean?

We believe that all human beings should be treated with dignity, fairness and respect.

Wherever we work in the world we ensure that we do not exploit anyone. We uphold the rights of all those who work for or with us, and of the communities in which we operate. Moreover, we will never knowingly do business with any individual, company or organisation that fails to uphold the standards and principles of basic human rights or has links with an oppressive regime that give us cause for concern.

### Human rights

Human rights are the basic rights and freedoms that belong to every person in the world. They include the right to life, the right to respect for private and family life, and freedom of thought, religion and expression.

The United Nations Universal Declaration of Human Rights proclaimed certain fundamental rights and freedoms. These include the right to life, liberty and security; equal rights of men and women; the right to protection under the law and against discrimination, slavery, servitude, torture, or inhumane or degrading treatment; and freedom of speech, thought, conscience and religion.

### Slavery and human trafficking

We do not tolerate forced, debt bonded, indentured labour practices, or human trafficking. In the United Kingdom, we expect every party who we have dealings with to adhere to the principles of the Modern Slavery Act 2015, as we do ourselves.

### Our commitments

- To support all the principles set out in the United Nations Universal Declaration of Human Rights.
- To support the principles of the Modern Slavery Act 2015 in relation to slavery and human trafficking.
- To support the International Labour Organisation's standards regarding child labour and minimum age.
- To comply with national legal requirements regarding wages and working hours.
- To comply with this Code and every company policy setting out the rights of everyone who works for or with us, or who is impacted in any way by our activities.
- To observe, protect and promote these rights wherever we operate.
- To encourage our people and suppliers to identify any person they think may be at risk from these practices and so help us to help people at risk.





## RESPECTING THE ENVIRONMENT

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### Our principle

We care about the natural world and recognise our responsibility to work within environmental limits.

### What do we mean?

We are committed to managing our businesses in an environmentally responsible manner and to comply with UK and local laws and regulations relating to the protection of the environment. Company offices must implement processes designed to comply with applicable environmental laws.

We contribute to sustaining local economies by employing local expertise and selecting and developing local sub-consultants and suppliers.

### Our commitments

- To work to reduce all forms of waste across energy consumption, material usage and business processes, within our own and on behalf of our clients.

### What does it mean to me?

#### We expect you to:

- ✓ Take the time to understand the environmental risks and impacts associated with your daily work and actively look for opportunities to reduce them. This includes the production of waste and carbon dioxide, as well as the consumption of energy, water, materials and other resources.
- ✓ Reduce waste wherever possible.
- ✓ Use recycling facilities wherever possible.
- ✓ Avoid unnecessary travel – use conference call facilities or video-conferencing call facilities.
- ✓ Walk or use public transport where you can.
- ✓ Follow the requirements and procedures for using, storing, labelling, transporting and disposing of chemicals and hazardous materials.
- ✓ Always consider the environment when making purchasing decisions.

## COMMUNITIES

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### Our principle

To leave a positive impact on the people and local communities wherever we are in the world.

### What do we mean?

Gleeds is committed to strengthening sustainable benefits to the local communities in which we work around the world. By being attentive to community needs and expectations, and by respecting each community's uniqueness, we build strong relationships.

We will proportionately address community needs as part of our project work and positively impact, through our community benefit programmes, the social, economic, or environmental circumstances of the communities we work in.

We believe that our strategy to be a more sustainable business operating in profitable markets, healthy communities and within environmental limits are not competing interests and that when aligned they can create shared value. To be a successful and profitable company, we need to realise that.

### Our commitments

- To respect the traditions, cultures and laws of the countries in which we operate.
- To seek to employ local people in our projects wherever possible.
- To offer young people in our communities access to the skills and expertise that can help them get ready for the world of work and consider construction as a career path.
- To keep records of the resources and time spent delivering community benefit and social value activities, clearly showing who worked alongside us and who we provided benefits to.











## Section 4

**We make workplace  
safety a priority**

## WORKPLACE SAFETY

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### Our principle

Nothing is more important than the health and safety of everyone who works for or with us.

### What do we mean?

At Gleeds, the safety of employees, clients and the public are of vital importance. We make every effort to comply with all applicable laws, regulations, policies, programmes, and procedures involving health and safety.

It is everyone's responsibility to maintain a safe work environment. Promptly report any job-related injury and illness and be sure to comply with all emergency and security policies at facilities and worksites.

Gleeds requires an environment that is free from threatening behavior and violence, including intimidation and physical harm.

A safe workplace is a drug-free workplace. Drugs and alcohol impair judgment and could interfere with your ability to perform your job safely. Therefore, the company prohibits anyone from working while impaired by alcohol, drugs, or any medication that could raise questions concerning your ability to work safely.

### Our commitments

- To develop and promote safe working practices in our offices and on site, advocating the increase of health and safety standards across the world.

### What does it mean to me?

#### We expect you to:

- ✓ Take reasonable care of your own health and safety.
- ✓ Take reasonable care not to put other people at risk by what you do or don't do in the course of your work.
- ✓ Understand and follow the company's health and safety policies.
- ✓ Undertake relevant health and safety training.
- ✓ Promptly report any job-related injury and/or illness.
- ✓ Complete Gleeds' Display Screen Equipment (DSE) Questionnaire when asked to do so and without delay.
- ✓ Tell your manager about any health and safety concerns you have, and report any hazards and defects observed in the workplace.
- ✓ Immediately report any threatening behaviour or violence, including intimidation and physical harm, that is taking, or has taken, place in the work environment to your manager or to the People Department.
- ✓ Report any possible signs of drug or alcohol abuse to your manager.

#### You should never:

- ✗ Interfere with or misuse anything that's been provided for your health, safety or welfare.
- ✗ Use threatening behaviour or violence, including intimidation and physical harm at work.
- ✗ Be impaired by alcohol or drugs while at work.
- ✗ Consume, sell or purchase illegal drugs in the work environment.







A close-up photograph of a hand holding a bright yellow card. The card is tilted and contains text. The background is blurred, showing what appears to be a person's face and some greenery.

## **Section 5**

**We support open and  
fair competition**

## OPEN AND FAIR COMPETITION

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### Our principle

We believe in open and fair competition and only seek competitive advantage through fair and lawful means.

### What do we mean?

We want to work in a marketplace that is fair, open and honest. We want our competitors, clients and suppliers to know this is how we will always behave.

Losing our reputation for integrity by trying to gain unfair competitive advantage is the worst deal we can make. So, we comply with competition and anti-trust laws wherever we do business.

#### Competition and anti-trust laws

Most countries in which Gleeds operate have adopted competition or anti-trust laws prohibiting infringement of free competition. The laws differ by country and can be very complex. These laws must be strictly complied with.

Unlawful infringement of free competition, which is not tolerated within Gleeds in any country, may take a variety of forms, notably:

- Agreements among competitors to increase or fix prices, reduce competition in tendering/bidding procedures, share out markets, mislead clients, etc. A simple exchange of information between competitors, prior to submitting bids as part of a tendering procedure, may be deemed unlawful if it is aimed at or results in changing or distorting competition.
- Abuse of a dominant position, in which a company seeks to take advantage of the position it holds in a market to oust its competitors.
- Abusive exploitation of a position of economic dependence in which a client or a supplier of a company finds itself with respect to the latter.

Violations of such laws are very serious and lead to criminal or civil prosecution. They can also result in very large fines against the company. For example, a breach of European competition law can result in fines of up to 10% of Gleeds' global revenue.

### What does it mean to me?

#### We expect you to:

- ✓ Refrain from any behaviour that could be interpreted as anti-competitive in the sectors in which Gleeds operate.
- ✓ Act within the rules of competition applying to the countries in which Gleeds operate.
- ✓ Take great care dealing with competitors, as any kind of agreement with them (for example, not to use certain sub-consultants or suppliers) can raise competition concerns. An agreement does not have to be in writing to be illegal. It can be an informal "understanding" about commercial behaviours.
- ✓ Report any suspicions or allegations of possible anti-competitive behaviour to our Risk & Compliance Directorate.
- ✓ Inform the Risk & Compliance Directorate immediately if we receive confidential information we should not have obtained.
- ✓ Ask the Risk & Compliance Directorate if you are in doubt.

#### You should never:

- ✗ Exchange non-public or other sensitive information with competitors or other parties.
- ✗ Agree with competitors to fix the price of services.
- ✗ Agree with competitors to divide accounts, regions and market sectors between us.

## GIFTS AND HOSPITALITY

### Our principle

We make sure gifts and hospitality are reasonable and don't improperly influence a decision.

### What do we mean?

Is it a gift or a bribe? Is it hospitality – or persuasion? What would a newspaper say?

Gifts and entertainment are a normal part of doing business and can help maintain strong business relationships with those with whom we conduct business. However, gifts are inappropriate if they are intended to influence business decisions or call your or Gleeds' integrity into question.

Any gifts or hospitality we receive or give in connection with our business should always be customary and reasonable in terms of value and frequency. Use your judgement and good sense. In principle, there is nothing wrong with genuine relationship-building gifts or hospitality. But ask yourself, "Is this excessive? Is it a gift or a bribe? Is it hospitality or persuasion?". If you are struggling to justify it to yourself, it's probably not okay. If in doubt, consult our Risk & Compliance Directorate.

Remember, just the appearance of impropriety can be damaging.

### What does it mean to me?

#### We expect you to:

- ✓ Ensure any gift and hospitality offered, received or declined is recorded on our register.
- ✓ Comply with financial limits or approval requirements in Gleeds' policy.
- ✓ Check with our Risk & Compliance Directorate before offering any kind of gift or hospitality to public officials.
- ✓ Check with clients before offering any kind of gift or invitation as they may have rules requiring them to report and/or refuse such things.

#### You should never:

- ✗ Offer or accept gifts or hospitality if you think they might impair objective judgement, improperly influence a decision or create a sense of obligation.
- ✗ Solicit gifts or hospitality.
- ✗ Offer or accept cash or a cash equivalent, such as a gift card.
- ✗ Offer or accept a courtesy that:
  - Could be interpreted as a reward for preferential treatment; or
  - Might be construed as a bribe or kickback.
- ✗ Offer or accept a courtesy if it involves a party in an active procurement with Gleeds.



## CONFLICTS OF INTEREST

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### Our principle

We disclose perceived, potential or actual conflicts of interest in a timely manner for proper review and resolution.

### What do we mean?

Our success depends on our commitment to honesty and integrity.

Additionally, Gleeds is regulated by the Royal Institution of Chartered Surveyors (RICS). Both RICS members and RICS regulated firms must not advise or represent a client where doing so would involve a conflict of interest or a significant risk of a conflict of interest; other than where all of those who are or may be affected have provided their prior informed consent.

Conflicts of interest must be managed in accordance with the RICS professional statement: Conflicts of interest. This applies to all Gleeds' people, not just to those who are RICS members.

Conflicts of interest arise when we find ourselves in a position where personal interest makes it difficult to make objective business decisions on behalf of Gleeds or calls your integrity into question. Usually the conflict is about individuals benefiting at the expense of the company or another employer. Very often, perceptions of a conflict of interest can be just as damaging as an actual conflict of interest.

We take great care not to involve ourselves in anything that can give rise to a conflict between our interests and those of Gleeds.

Given the size and nature of Gleeds, we recognise that conflicts of interest are sometimes unavoidable. As soon as we realise there's a potential conflict, we must disclose it and seek approval or guidance.

If you are in doubt, consult a Director within the Risk & Compliance Directorate for further guidance or see the Gleeds' intranet for relevant policies and procedures.

Examples of conflicts of interest include:

- Conducting Gleeds business with family and friends.
- Supervising anyone with whom you have a family or romantic relationship.
- Taking advantage of opportunities, you learn about through your employment without first giving Gleeds a chance to pursue it.
- Being employed by or consulting with another organisation if it interferes with your primary responsibilities at Gleeds.
- Making significant investments in Gleeds' competitors, customers, suppliers, or other business partners.

### Secondary employment outside of Gleeds

Secondary employment outside of Gleeds requires the prior approval of the head of your Business Unit. Approval will usually be given provided the type of work undertaken does not conflict with Gleeds' interests, and it is considered that it will not adversely affect your work performance.

### What does it mean to me?

#### We expect you to:

- ✓ Disclose the facts of the situation to your Line Manager, Business Unit Director, the People Team or a Director within the Risk & Compliance Team as soon as you become aware that a potential conflict of interest exists.
- ✓ Identify and manage conflicts of interest in accordance with the RICS Professional Statement: Conflicts of Interest.
- ✓ Keep records of the decisions made in relation to whether to accept (and where relevant, to continue) individual professional assignments, the obtaining of informed consent, and any measures taken to avoid conflicts of interest arising.
- ✓ Avoid government contracting situations where our objectivity and fairness are called into question.



**You should never:**

- ✘ Proceed if there are potential conflicts of interest.
- ✘ Use your position, contacts or any knowledge gained at Gleeds for personal gain or to benefit family or friends.
- ✘ Pay a third party more than a contractually agreed, market-based fee for services.
- ✘ Accept gifts or hospitality that could impair our judgement or independence or be open to misinterpretation.
- ✘ Do anything that might create the impression that customers or suppliers have a contact in Gleeds who can exert influence on their behalf.

**What does it mean to me?****We expect you to:**

- ✔ Obtain appropriate approval before appointing an agent or third-party and follow Gleeds policies relating to agents or third parties.
- ✔ Follow Gleeds third party assurance process.
- ✔ Complete due diligence on experience, background and reputation of agents and third parties.
- ✔ Ensure that you understand what agents or third-parties will do on our behalf.
- ✔ Make sure that all money can be properly accounted for.

**AGENTS AND THIRD-PARTY REPRESENTATIVES****Our principle**

We only use agents or representatives if we have to, and they act to the standards consistent with our Code.

**What do we mean?**

Agents and third-party representatives provide help, advice and local knowledge that can be essential to business activities. At all times, they must operate in accordance with our standards, particularly in the areas of bribery and corruption.

If you are using the services of an agent or third-party representative, it is your responsibility to make sure that they are aware of, and operating in accordance with, our Code. Ignorance of what an agent is doing on our behalf or in our name is no excuse.

**You should never:**

- ✘ Permit anyone to offer bribes or make facilitation payments on our behalf.
- ✘ Permit anyone to do anything that we would not be permitted to do ourselves.
- ✘ Enter into an agreement that does not have commercial rationale.
- ✘ Pay any money to an agent or third-party without a written binding agreement being in place and knowing exact details of what the payment is for.

## PUBLIC POLICY AND POLITICAL ACTIVITY

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### Our principle

We make sure that any public policy or political activity we undertake is lawful, ethical and within our Code of Integrity and Business Ethics. As a company, we do not participate in party political activities.

### What do we mean?

We all need to take care about what we say, do or support in the public or political domain.

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 organisation, party or candidate.

Any political contribution in the EU needs approval from our owners. 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/industry engagement.

Gleeds does not make any political donations or contributions in the European Union. In the US, our operating companies may make political contributions or donations, provided they are approved by the President of Gleeds' US businesses and comply with policies and processes approved by the Chief Executive of Gleeds. 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 Gleeds we must take great care about what we say, do or support in the public or political domain.

### Your right to your political view

Everyone who works for us has the right to participate in politics in their personal capacity and to pay political contributions out of their own pocket, so long as this does not lead them into a conflict of interest (See "Conflicts of interest" in Section 5 of this Code). But you can't use the company's time or resources to do so, and you mustn't ever appear to represent the company or its views when engaging in personal political activities, unless specifically authorised by the company to do so.

### What does it mean to me?

#### We expect you to:

- ✓ Make sure of the facts and have the appropriate approvals when talking with governments and public bodies.
- ✓ Make sure all our interactions with public officials comply with our Code.

#### You should never:

- ✗ Engage in any public policy activity on behalf of Gleeds or appear to represent the views of the company unless expressly authorised to do so by Corporate Communications.

## BOYCOTTS, SANCTIONS AND LEGAL REQUIREMENTS

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### Our principle

We comply with all recognised trade regulations and restrictions imposed by national and international authorities.

### What do we mean?

We always want to trade lawfully and properly, so we comply with all trade regulations and restrictions imposed by national and international authorities.

These include the United Nations, the European Union, the UK, and the US. This requires diligence. Breaking a country's laws on these issues, even inadvertently, could mean we are unable to work in that country again. However, in some areas of the world there are attempts to impose illegal or unofficial restrictions. We do not comply with them, and we refuse to engage in restrictive trade practices that are prohibited.

If in any doubt, consult our Risk & Compliance Directorate.

## US laws

US law imposes further restrictions that are not necessarily approved by recognised international authorities:

- These restrictions seek to prohibit people and organisations from working in certain countries specified by the US federal or state governments, or with certain blacklisted organisations that have dealings with terrorist organisations or drug traffickers.
- US citizens employed by any member of the Gleeds Group must comply with these laws.
- Sanctions for breaching them can include barring Gleeds' companies from engaging in US trade or public sector work, very heavy fines and imprisonment of individuals.

## CHARITIES AND NON-PROFIT ORGANISATIONS

### Our principle

We support appropriate national and local charities and other non-profit organisations. We want to contribute to the communities we work in.

### What do we mean?

We want to have a positive and beneficial effect on the communities we live and work in, so people are better off because of us. So, we actively participate in local communities and charitable activities. We also encourage our employees to devote time to good causes during working hours. However, when acting on the company's behalf, we must be mindful of our responsibilities.

## What does it mean to me?

### We expect you to:

- ✓ Ensure the charity is appropriate and approved in accordance with local business policies and processes.
- ✓ Check for potential conflicts of interest.
- ✓ Keep records of the resources and time spent delivering charity and volunteering programmes, demonstrating who invested in what and how.

### You should never:

- ✗ Offer or make a charitable contribution as an incentive or reward for obtaining or retaining business or for any other improper purpose.
- ✗ Contribute to a charity unless we are sure the charity is bona fide and has all appropriate registrations.
- ✗ Use charitable donations as a substitute for political payments.
- ✗ Use company time or resources without permission.









## Section 6

**We do not misuse  
property or information**



## PRIVACY AND DATA PROTECTION

### Our principle

We respect and protect everyone's privacy and comply with all data protection laws.

### What do we mean?

Data protection and privacy laws regulate the collection, storage, disposal, use and disclosure of personal information (such as names, addresses, dates of births, national insurance or social security numbers, job titles or photographs), which can identify a living person. Whilst there are international standards, laws do vary from country to country (e.g. The Data Protection Act 2018 and the Privacy Electronic Communications Regulations 2018 in UK, and the General Data Protection Regulation 2016 in the EU). Wherever we gather, hold and use personal information, we must always comply with that country's data protection laws, while also complying with Gleeds' own standards and policies on protecting personal information.

It can be easy to forget that the information and records we hold, and use may contain personal information. We only collect, retain and use personal information required for our legitimate interests, or as permitted by data protection laws. Those with access to it must only use it in an authorised way.

We take particular care with sensitive personal information, such as medical information and we work to ensure appropriate standards of data protection are in place across all our businesses worldwide.

If you're in any doubt about any aspect of this, always seek advice and approval from your Data Protection Officer (DPO) or local Data Protection Coordinator. For more guidance, see Gleeds' data protection and information security policies and procedures.

### What does it mean to me?

#### We expect you to:

- ✓ Follow Gleeds data protection and information security policies.
- ✓ Protect personal information and keep it confidential and secure.
- ✓ Use it only in ways individuals would reasonably expect and let them know what we intend to use it for and the people we may share it with.
- ✓ Make sure it's only shared with people who have a legitimate need to know, or with the consent of those whose information we hold.
- ✓ Promptly report any loss of personal information to your DPO or local Data Protection Coordinator.
- ✓ Ask your DPO or local Data Protection Co-ordinator if you have any doubts about the collection, storage, disposal, use and disclosure of personal information.

#### You should never:

- ✗ Share personal information with third parties unless authorised to do so.
- ✗ Transfer personal information outside its country of origin or give other markets access to it without ensuring that the transfer is permitted under the data protection laws.



## CONFIDENTIAL INFORMATION

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### Our principle

We respect and protect everyone's privacy and comply with all data protection laws.

### What do we mean?

Disclosing confidential information can destroy its value, harm the company or third parties, and damage the trust people have in us.

Any improper disclosure or misuse of confidential information about Gleeds can have a huge impact on us. We must keep it safe, only share it internally on a "need to know" basis, and only disclose it to a third party on a confidential basis and with appropriate authorisation to do so. Confidential information belonging to clients, suppliers or other third parties must be respected and protected in the same way.

### Confidential information

Confidential information refers to any information or document that a business or an individual does not wish to make public. It can include anything that has been acquired by or made available to an individual or other legal entity during the relationship between the parties.

Client confidentiality is the principle that you should not reveal information about our clients, including information about their projects, to a third party without the consent of the client or a clear legal reason.

Confidential information refers to all confidential and/or proprietary information or material belonging to or in the possession of any person employed by Gleeds. It may be oral, visual, in writing, or in any other form. It includes:

- Financial information, business plans, marketing plans, projections or strategies, property, business practices and relationships, processes, systems, or methods of operation.
- Client and supplier information.
- Employee information.



### What does it mean to me?

#### We expect you to:

- ✓ Report any information we obtain that you think may be commercially sensitive.
- ✓ Ask a Director within our Risk & Compliance Directorate if you have any doubts about the use or disclosure of information.
- ✓ Report confidential information received in error and return it to its rightful owner.
- ✓ Make sure clients, suppliers and other third parties protect our confidential information.

#### You should never:

- ✗ Share confidential information with third parties without the consent of the client, or supplier, or a clear legal reason to do so.
- ✗ Leave confidential information lying around or unsecured, or otherwise fail to take care of it.
- ✗ Divulge confidential information of or about a previous employer unless permitted to do so.
- ✗ Use insecure technologies and methods when exchanging confidential information.
- ✗ Discuss confidential information in a way that it can be overheard in public.

## COMMUNICATIONS AND DISCLOSURES

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### Our principle

We disclose or communicate information about the company in a timely and accurate way, and we seek to inform and not mislead.

### What do we mean?

How we talk about ourselves plays a huge part in how much we are trusted. We always communicate with integrity. Whether favourable or unfavourable to Gleeds, the information we disclose is always timely, accurate, complete, truthful and reliable. We never seek to mislead.

Sometimes it's possible to find yourself acting as a spokesperson when you didn't really mean to. You should never communicate on behalf of Gleeds if you aren't authorised to do so. And remember that internal communications are one press of a button away from being external communications.

### Company communications

These are any external messages from us or anyone we authorise to speak about us or our business. They include press releases, communications with news media or journalists, promotional materials and advertisements, public speaking opportunities or industry roundtables and other public statements.

### Disclosures

These are statements submitted or published by us to owners, regulators, the media and other third parties.

### What does it mean to me?

#### We expect you to:

- ✓ Ensure all company communications and disclosures have received prior internal approval, no matter what the medium. If in doubt, consult the Corporate Communications team.
- ✓ Take care about what we say at meetings or other public events.
- ✓ Watch out for situations in which we may be considered to be speaking on behalf of the company.
- ✓ Take care not to betray the company's interests when using social networking websites, blogs and chat-rooms and other electronic communications.

#### You should never:

- ✗ Respond to the media, regulators, government agencies or other external enquiries without express permission.
- ✗ Express personal views in a way that might lead them to be interpreted as the company's views.
- ✗ Record things about people that we would be embarrassed to say to their face.
- ✗ Lose sight of the fact that we may one day have to explain to a court or read in the newspapers what we write in emails, text messages or other communications or documents.
- ✗ Say or write things that may embarrass Gleeds' clients in any way or damage Gleeds' relationship with them.

## USING COMPANY COMPUTER SYSTEMS

### Our principle

Company computer systems are for use at work. The company permits reasonable and appropriate personal use for non-work-related purposes.

### What do we mean?

Our company computer systems and the information they contain are valuable assets.

They must not be used for any improper purpose, or in any way that might affect their operation or integrity.

### Company computer systems

This includes information and communication technology, systems and equipment that are owned or used by Gleeds. They include:

- Desktop, laptop and handheld computers/devices, such as tablets.
- Servers and networks (including connections to public or external networks such as the internet).
- Storage devices such as memory sticks, memory cards, removable hard drives, DVDs and CDs.
- Telephones (including mobile phones) and computerised office equipment (such as printers and scanners).
- Information stored in and transmitted by these technologies, such as emails, voice mails, instant messages, electronic files, database entries and internet postings.

We should all assume that any information stored or communicated through Gleeds' computers or networks are the property of Gleeds. We should all be aware that Gleeds may monitor our emails and internet usage, whether work-related or personal, without notice, where allowed by law.

Gleeds provides computer resources, networks, and internet for business purposes. Although Gleeds allows occasional personal use of these resources, this must never interfere with your work responsibilities.

**Personal use is a privilege not a right and must not be abused**

### What does it mean to me?

#### We expect you to:

- ✓ Follow all information security and acceptable use policies when using company computer systems for work-related or personal use or when accessing or storing company information on personal computer systems.
- ✓ Take proper precautions to protect company computer systems and company information against loss, damage or theft.
- ✓ Advise a Director within our Risk & Compliance Directorate, or within Gleeds Technology Ltd. (GTL) if you know of or suspect an inappropriate use of Gleeds' electronic resources.

#### You should never:

- ✗ Use company computer systems to access, view, obtain, create or distribute any material that's illegal or offensive, or that's been obtained illegally. This includes obscene, sexually explicit, sexist, racist, defamatory, discriminatory, harassing and abusive material or material that is in breach of copyright.
- ✗ Use company computer systems to download unlicensed or illegal material.
- ✗ Have any expectation of privacy when using company computer systems for personal or non-work-related activities, unless local laws state otherwise.





## DEFINITIONS

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### Gleeds

Means the legal entities that comprise the Gleeds Group of companies worldwide.

### Company computer systems

Company computer systems are information and communication technology, systems and equipment that are owned and used by Gleeds.

They include: voicemail, email, electronic file transfer, instant messaging (electronic chat), electronic conferencing and electronic collaboration tools, as well as internet forums and tools such as web logs (internet diaries or blogs), social networking sites and virtual worlds.

### Public officials

Public officials include the following:

- Officers and employees of any national, regional, local or other governmental entity, including elected officials.
- Any private person acting temporarily in an official capacity for or on behalf of any such governmental entity (such as a consultant retained by a government agency).
- Officers and employees of companies in which a government owns an interest.
- Candidates for political office at any level.
- Political parties and their officials.
- Officers, employees or official representatives of public (quasi-governmental) international organisations, such as the World Bank, United Nations, International Monetary Fund, etc.

## EMPLOYEE COMMITMENT FORM

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### Employee Commitment Form

I have received Gleeds' Code of Integrity and Business Ethics. I have read the Code and understand the standards that apply to my job. I understand that it represents mandatory policies of Gleeds and affirm that I will:

- Adhere to the standards of conduct in the Code, including all policies and procedures that apply to my job
- Participate in periodic training courses on ethics and compliance topics relevant to my job.
- Use one of the resources available when I need information or guidance about an ethical concern or legal issue, or to report any action that appears to be inconsistent with Gleeds' standards of integrity and business ethics.

Employee signature:

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Printed name:

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Business Unit:

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Office location:

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Date:

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