

MAY 26 2017

Ms. Ruth M.S. Vetter
Alternate Designated Agency Ethics Official
Office of the General Counsel
Department of Defense
Washington, DC 20301

Dear Ms. Vetter:

The purpose of this letter is to describe the steps that I will take to avoid any actual or apparent conflict of interest in the event that I am confirmed for the position of Assistant Secretary of Defense for Legislative Affairs.

As required by 18 U.S.C. § 208(a), I will not participate personally and substantially in any particular matter in which I know that I have a financial interest directly and predictably affected by the matter, or in which I know that a person whose interests are imputed to me has a financial interest directly and predictably affected by the matter, unless I first obtain a written waiver, pursuant to 18 U.S.C. § 208(b)(1), or qualify for a regulatory exemption, pursuant to 18 U.S.C. § 208(b)(2). I understand that the interests of the following persons are imputed to me: any spouse or minor child of mine; any general partner of a partnership in which I am a limited or general partner; any organization in which I serve as officer, director, trustee, general partner or employee; and any person or organization with which I am negotiating or have an arrangement concerning prospective employment.

Upon confirmation, I will resign from my position with CH2M Hill. I hold stock, vested stock options, and unvested stock options with CH2M Hill. Upon my resignation, I will forfeit my CH2M Hill unvested stock options and will not exercise my vested stock options thereby forfeiting my vested options. Within 90 days of my appointment, I will divest all of my CH2M Hill stock. I will not participate personally and substantially in any particular matter that has a direct and predictable effect on the financial interests of CH2M Hill until I have divested the stock, unless I first obtain a written waiver, pursuant to 18 U.S.C. § 208(b)(1), or qualify for a regulatory exemption, pursuant to 18 U.S.C. § 208(b)(2). Additionally, for a period of one year from the date of my appointment, I will not participate personally and substantially in any particular matter involving specific parties in which I know that CH2M Hill is a party or represents a party, unless I am first authorized to participate, pursuant to 5 C.F.R. § 2635.502(d).

I understand that I may be eligible to request a Certificate of Divestiture for qualifying assets and that a Certificate of Divestiture is effective only if obtained prior to divestiture. Regardless of whether I receive a Certificate of Divestiture, I will ensure that all divestitures discussed in this agreement occur within the agreed upon timeframes and that all proceeds are invested in non-conflicting assets.

If I have a managed account or otherwise use the services of an investment professional during my appointment, I will ensure that the account manager or investment professional

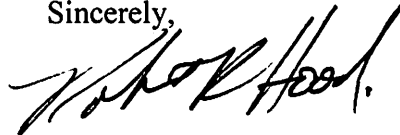
obtains my prior approval on a case-by-case basis for the purchase of any assets other than cash, cash equivalents, investment funds that qualify for the exemption at 5 C.F.R. § 2640.201(a), obligations of the United States, or municipal bonds.

I will meet with you during the first week of my service in the position of Assistant Secretary of Defense for Legislative Affairs in order to complete the initial ethics briefing required under 5 C.F.R. § 2638.305. Within 90 days of my confirmation, I will document my compliance with this ethics agreement by notifying you in writing when I have completed the steps described in this ethics agreement.

I understand that as an appointee I will be required to sign the Ethics Pledge (Exec. Order No. 13770) and that I will be bound by the requirements and restrictions therein in addition to the commitments I have made in this ethics agreement.

I have been advised that this ethics agreement will be posted publicly, consistent with 5 U.S.C. § 552, on the website of the U.S. Office of Government Ethics with ethics agreements of other Presidential nominees who file public financial disclosure reports.

Sincerely,

A handwritten signature in black ink, appearing to read "Robert R. Hood", written in a cursive style.

Robert R. Hood

Ms. Ruth M.S. Vetter
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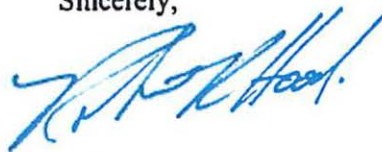
JUN 27 2017

Dear Ms. Vetter

The purpose of this letter is to supplement my ethics agreement signed on May 26, 2017. As part of that ethics agreement, I agreed that I would divest of all of my stock in CH2M HILL within 90 days of my appointment. However, restrictions placed by CH2M HILL on its internal market (which have been in place since September 2014) generally restrict the sale of CH2M HILL stock to a limited number of shares per quarter. Therefore, upon confirmation, and until I no longer hold any CH2M HILL stock, I will sell the maximum number of shares of stock allowed per quarter. I will not participate personally and substantially in any particular matter that has a direct and predictable effect on the financial interests of CH2M Hill until I have divested the stock, unless I first obtain a written waiver, pursuant to 18 U.S.C. § 208(b)(1), or qualify for a regulatory exemption, pursuant to 18 U.S.C. § 208(b)(2). Additionally, for a period of one year from the date of my resignation, I will not participate personally and substantially in any particular matter involving specific parties in which I know that CH2M Hill is a party or represents a party, unless I am first authorized to participate, pursuant to 5 C.F.R. § 2635.502(d).

I have been advised that this supplement to my ethics agreement will be posted publicly, consistent with 5 U.S.C. § 552, on the website of the U.S. Office of Government Ethics with ethics agreements of other Presidential nominees who file public financial disclosure reports.

Sincerely,



Robert R. Hood