code of conduct + ethics
Aurecon's Code of Conduct and Ethics is the focal point of our policy on ethical business and promotes 'acting with integrity and honesty at all times.' This code is very clear in the responsibilities it assigns to our people to:

- Act honestly and with integrity
- Maintain the highest levels of professional conduct
- Be truthful, and not mislead or make any false statements
- Not make promises or commitments that we don't intend to honour
- Familiarise themselves and comply with all Professional Codes of Ethics, Codes of Conduct, Codes of Practice or Rules of Conduct that apply to us within the geographies in which we operate.

"We recognise that our reputation in industry depends on our commitment to upholding ethical practices and procedures in every project we are involved in."

Anthony McCusker
Acting Chief Executive Officer
A culture of integrity

Aurecon is committed to acting with integrity in everything we do.

Aurecon has developed this Code of Conduct and Ethics (“Code”) for all directors, senior officers, executives, employees and contractors of Aurecon (collectively referred to as “Employees”) in all of its operations.

The Code sets standards of conduct and ethical behaviour required of all Employees of Aurecon and articulates acceptable practices for Employees to ensure that their duties and responsibilities to Aurecon are performed with the utmost integrity and with regard to Aurecon’s responsibilities to its owners, employees, clients, suppliers, creditors, consumers and the broader community.

We are committed to giving our stakeholders confidence in the way Aurecon operates, our systems, our compliance with those systems and the transparency of methods and the reporting of performance.

Our values

The Code is underpinned by the values contained in the Aurecon Charter.

Those values are:
- We foster human achievement through excellence, innovation and collaboration
- We respect others by celebrating diversity and acting with integrity and honesty
- We work to build a vibrant and brighter future for all.

Focal point of ethical business conduct

The Code is the focal point of Aurecon’s policy on ethical business conduct and supports all other Aurecon policies, standards and procedures and is governed by the following principles.

“Arecon’s values form the foundation of our commitment to our client relationships”

Anthony McCusker
Acting Chief Executive Officer

“We aim to grow a sustainable business, but also a sustainable world around us.”

Teddy Daka
Chairman

Anthony McCusker
Acting Chief Executive Officer

Teddy Daka
Chairman
Integrity and professionalism

A key Aurecon Charter value is ‘acting with integrity and honesty.’

Employees must familiarise themselves with and comply with all Professional Codes of Ethics, Codes of Conduct, Codes of Practice or Rules of Conduct that may be applicable to them in any jurisdiction in which Aurecon undertakes its business. These include the Rule of Conduct for Registered Persons, Engineering Profession Act 2000 of South Africa, the Professional Engineers (Code of Professional Conduct and Ethics) Rules of Singapore and the Engineers Australia, Code of Ethics.

Without in any way limiting the application of any such Code or Rules, Employees must:

a. Act honestly and with integrity in all of their dealings for Aurecon
b. Maintain the highest levels of professional conduct in their interactions with clients, colleagues, business partners and in representing Aurecon in the community
c. Not discriminate on the grounds of people’s race, religion, gender, marital status or disability or any other unlawful grounds
d. Be truthful, and not mislead or make any false statements, nor mislead by omission
e. Not make promises or commitments that Aurecon does not intend, or would be unable, to honour
f. Report breaches of this code; please refer to the Whistleblower Policy.

“We partner with our clients for enhanced project outcomes that benefit the communities in which we operate.”

Gustav Rohde
Chief Operating Officer

Accuracy of reporting

The confidence our stakeholders have in us is based, amongst other things, on the transparency and accuracy of our written records and verbal statements.

Our Employees must be committed to ensuring:

a. Compliance with all applicable accounting and financial reporting rules and regulations in each jurisdiction in which we operate
b. All transactions are properly authorised and accurately and completely recorded in the relevant accounts and records as required by law and applicable Aurecon requirements
c. All data once created is appropriately retained and disposed of according to Aurecon data retention and disposal practices, applicable laws and regulations
d. To the extent that Employees are responsible for the accuracy of financial reporting, that adequate internal controls exist to achieve truthful, accurate, complete, consistent, timely and understandable financial and management reports
e. That no Employee is ever pressured to alter financial or other data for any improper purpose.
Health and safety

Aurecon has an overriding commitment to health and safety and aspires to the goal of no harm to people. Employees must familiarise themselves with and honour this commitment and comply with all applicable laws, regulations and standards, and when applicable laws do not exist, adopt and apply standards that reflect Aurecon’s commitment to health and safety.

Protecting the environment

A key Aurecon Charter value is to ‘work to build a vibrant and bright future for all.’ Aurecon is aware of the important role it has in ensuring that human development occurs in an environmentally sustainable manner. Aurecon is committed to the principles of meeting the needs of the present without compromising the ability of future generations to meet their own needs. Aurecon recognises the need to balance economic growth with social development and the protection of the environment.

Employees must comply with all applicable environmental laws and regulations and accepted environmental standards in a manner that does not jeopardise the public welfare, health or safety.

In demonstrating our commitment to these ideals, we are committed to embedding sustainability as an integral part of our culture, our skills and our deliverables.

We will do this through:

a. Our corporate values
b. Implementing a group wide sustainability strategy
c. Reducing the footprint of our operations, including our carbon emissions
d. Increasing our sustainability knowledge, skills and tools to add value
e. Incorporating sustainability considerations into our services and project deliverables
f. Helping our clients, partners and stakeholders meet their sustainability commitments.

Collaboration with communities

A key Aurecon Charter value is that we foster human achievement through, amongst other things, “collaboration”.

Aurecon recognises that it has a corporate responsibility to promote and support the wider community interest. We require our Employees to build relationships with communities that may be impacted by our business by engaging regularly, openly and honestly with people affected by our operations and by taking the views and concerns of those communities into account in our work.

Personal information and privacy

We are committed to complying at all times with our obligations under all applicable privacy legislation in all countries in which we operate.

We will only collect and retain personal information relating to an individual so far as is necessary for legitimate business purposes and as permitted by the laws in the countries in which we operate.

“A robust and responsive health and safety culture is a critical part of our obligation to our employees, our clients and the communities in which we operate.”

Stephen Wells
Chief Business Development Officer
Communication systems

Aurecon's communication systems, including the internet and email system, are the property of Aurecon and may only be used by authorised persons for authorised business purposes. All email communications, which include hard copies and electronically stored copies, are the property of Aurecon. Employees should not expect that any email communication is confidential.

All transmissions generated on Aurecon’s communications systems must be polite and professional.

Sending, wilfully receiving, displaying, printing or otherwise disseminating material that is fraudulent, harassing, bullying, illegal, embarrassing, sexually explicit, obscene, intimidating, or defamatory is prohibited. This includes but is not limited to messages containing sexual comments or offensive comments regarding gender, age, sexual orientation, race, religious or political beliefs or other grounds of illegal discrimination.

Employees are also prohibited from using Aurecon’s communication system for personal commercial, advertising or political purposes.

Equal employment opportunity

A key Aurecon Charter value is that we ‘celebrate diversity and respect others.’

Aurecon is committed to ensuring fair and equal treatment for all Employees and that staff operate in an environment free of discrimination and harassment.

Aurecon will not, under any circumstances, tolerate bullying, sexual harassment, discrimination or general harassment in the workplace.

Aurecon understands the importance of supporting worldwide equal employment opportunity policies and the value of diversity to Aurecon.

In developing our employment strategies, the key focus will be on taking an equitable and merit based approach that respects the diversity of our people, is based on the principle of reward for effort and valuable contribution to the wider objectives of Aurecon and unleashes the potential of our people.

All Employees are engaged on written terms of employment. Aurecon’s policies and formal terms of employment will be consistent with the relevant laws, regulations and awards in the countries in which we operate.

Professional and technical excellence

A key Aurecon Charter value is to ‘foster human achievement through excellence, innovation and collaboration.’

Aurecon requires its senior technical managers to provide technical leadership through direct involvement in projects for its clients and the training and development of its Employees.

Aurecon will encourage and support its Employees to develop their professional and technical skill through formal training programmes, and support of post graduate education.

It is Aurecon policy that professional staff must obtain, and maintain, qualifications and accreditation relevant to the practice of their profession.
Working with Governments

Aurecon seeks to have an open and collaborative relationship with governments in all countries in which it works.

All Employees must ensure that they familiarise themselves with and comply as necessary with all applicable government contracting standards, laws and regulations.

Employees must abide by this Code no matter where Aurecon does business.

Bribery and corruption

A key Aurecon Charter value is ‘acting with integrity and honesty.’

Aurecon prohibits and will not tolerate any form of bribery and corruption in its business dealings.

Bribery involves providing a benefit to any person to improperly influence actions by a third party.

Officers and Employees involved in international operations and in accounting and audit functions are required to be familiar with and abide by all laws in every country in which Aurecon operates that prohibit bribery and corruption including when it is committed outside the country.

Aurecon prohibits and will not tolerate any form of bribery and corruption in its business dealings.

Gifts and entertainment

The reputation of Aurecon and its Employees will be harmed by allegations of, and perceptions of, improper behaviour as well as potential breaches of bribery law.

Aurecon recognises that offering or accepting gifts and entertainment is a way of building good business relationships if done in an appropriate way and on an appropriate scale.

Employees are required to exercise the utmost discretion in offering and accepting gifts and entertainment and must in any event disclose the offer of acceptance of any gifts or entertainment to their supervisor or managers.

In particular, regard must be had to:

a. The overriding imperative to avoid any behaviour that might be perceived as improper
b. The frequency of offering and accepting gifts and entertainment
c. The value of any gifts or entertainment
d. The reasonableness and suitability of the gifts or entertainment
e. Any perceived undue influence
f. The operation of the law and local business practices
g. Standards of government and non-government organisations in relation to such matters.

Conflict of interest

Situations of real, potential or perceived conflicts of interest can arise in the undertaking of Aurecon’s business.

Employees must make a full and proper disclosure of any such real potential or perceived conflict to the Employee’s manager or supervisor.

Where a person is in any doubt about whether there is a real or potential conflict of interest, clarification should be sought from the person’s manager or supervisor and the manager or supervisor will take all reasonable steps to either resolve the conflict or to advise what steps need to be taken to avoid or handle a situation.

Officers and Employees must not engage in any conduct involving a real, potential or perceived conflict without having first received prior written consent from the employee’s manager or supervisor.
Employees must ensure that they engage only reputable, competent and qualified third parties to undertake work on behalf of Aurecon. Aurecon requires third parties to familiarise themselves with and to commit and adhere to this Code of Conduct and Ethics.

Aurecon must only select sub consultants, contractors and other third party providers of goods and services who act in a manner consistent with the standards obtained in the Code.

Employees must act fairly and with integrity in dealing with third party suppliers of goods and services and must comply with all policies and standards of Aurecon in relation to engaging third party suppliers of goods and services.

**Restrictive trade practices**

Most countries in which Aurecon operates have laws that prohibit practices that restrain trade or restrict free and fair competition, including price fixing, collusion with competitors on contract terms and other similar practices with competitors that negatively impact clients and are counter to free market principles. Breaches of competition laws carry potentially serious consequences for both Aurecon and its Employees and other individuals who may be involved. Penalties range from imprisonment in some countries to very significant fines.

Aurecon is committed to complying with all such laws in all countries in which it operates.

**Political contributions and activities**

Aurecon does not engage in the activities of political parties and does not make political donations in cash or kind. Aurecon’s Employees are permitted to engage in political activities as individuals subject to the other provisions of this Code, including the duty to avoid conflicts of interest and as long as they do not purport to represent Aurecon. Employees are expected to remember at all times that their personal conduct can impact on the reputation of Aurecon and are expected to act accordingly.

Aurecon recognises the importance of fostering a culture and business environment in which Employees feel safe to report improper and unethical conduct without fear of being victimised. Aurecon is therefore committed to develop, appropriate reporting procedures for unethical conduct that is consistent and complies with the applicable laws of the countries in which we operate. Aurecon will also develop procedures for the investigation of any report of unethical conduct.

All Employees are expected to report unethical or improper conduct or breaches or suspected breaches of the Code in accordance with the applicable reporting procedure.

Aurecon will, to the extent possible, treat any report of unethical conduct or a breach of this Code in strict confidence. Aurecon will not tolerate any form of punishment, disciplinary or retaliatory action against any person for reporting a matter in good faith in accordance with the Code or any policy, standard or procedure of Aurecon. Any such retaliatory action will itself be a serious breach of the Code which will result in disciplinary action, including termination of employment in appropriate cases.

Employees who wish to report breaches of the code, Aurecon Policies or the law should refer to the Whistleblower Policy.

“We aim to set industry standards, benefit communities and make a significant contribution.”

Brendan Gibbs
Chief Risk Officer
If you are unsure about the meaning of the Code or how it applies to you, you should immediately raise your concern, as appropriate, with your manager or the Company Secretaries Rosemary Peavey and Jan-Lodewyk Pretorius.

It is your responsibility to familiarise yourself with the Code and all other Aurecon policies, standards and procedures that apply to you.