

## Business Ethics, Law & Regulations Policy

This Policy applies to, and governs the conduct of, all employees, officers and directors of the Kramer Ausenco group of companies, as well as all agents of Kramer Ausenco, joint-venture partners and any third parties doing business in Kramer Ausenco's name (collectively known as 'Personnel').

Kramer Ausenco is committed to operating to the highest standards of ethical behaviour, honesty, and fairness in all relationships with our stakeholders. We believe that good Corporate Governance practices are about conducting business in a transparent and ethical manner. In performing duties for, or on Kramer Ausenco's behalf, Personnel shall communicate and deal with others with honesty, integrity, and professional courtesy. We respect difference and consider diversity a strength. Our work environment allows all personnel to work to their full potential, free of all forms of harassment, discrimination and bullying.

Kramer Ausenco is committed to abide by all laws and regulations applicable to the jurisdictions in which it operates, and we expect anyone doing business on our behalf to also comply with those laws and regulations. In all locations, Personnel are expected to maintain a level of professional conduct and business ethics no less stringent that would be acceptable in highly developed countries, even though an 'understanding' of local law or custom may seem to permit business standards that are less exacting.

No Personnel shall follow a duty or interest of a private nature that may conflict, directly or indirectly, with their duties to Kramer Ausenco.

All data, business information, ideas, concepts, drawings, and other information, in any recorded form or media, made known or available to any Personnel through or by reason of their employment or engagement with Kramer Ausenco, is to be kept strictly confidential and not used, disclosed or copied except as required in the course of their duties to the Company.

No Personnel shall participate in any form of fraudulent activity or event, including deliberate falsification of Company records or business documents, or participating in anti-competitive or monopolistic business practices. Generally, this includes price fixing or any arrangements which deny or restrict services or product to a market or potential customers. Compliance with Kramer Ausenco's accounting and internal controls procedures is mandatory. All accounting records, expenditures, expense reports, invoices, vouchers, gifts, business entertainment and any other business records must be accurately and reliably reported and recorded in the Company's financial records.

No Personnel shall offer, make or promise to make, directly or indirectly, any payment of money or provide anything of value which is for the purpose of inducing or influencing a person to act in any way to assist Kramer Ausenco in obtaining, facilitating or retaining business, or securing any improper business advantage for Kramer Ausenco. This restriction applies to payments to private individuals as well as public officials.

No Personnel shall accept, directly or indirectly, any payment of money or anything of value which is for the purpose of inducing or influencing such Personnel to act in any way to assist the offerer, directly or indirectly, in obtaining, facilitating or retaining business with Kramer Ausenco or of securing any improper business advantage for the offerer.

No Personnel shall utilise Kramer Ausenco funds or assets to support a political party, committee or candidate for political office. A contribution to commonly recognised Industry Trade Associations that may perform political lobbying is generally acceptable.

Kramer Ausenco does not reimburse directors, officers or employees for political contributions and does not make political contributions. If a Kramer Ausenco employee wishes to participate in political activities, this should be done during non-working hours, away from and without use of Kramer Ausenco property, and in such a manner that Kramer Ausenco would not be perceived to be associated with or endorsing such political activities.

Employees who become aware of a possible compliance violation are required to make a compliance violation report as soon as possible either through their supervisor and / or by utilizing the Kramer Ausenco "Alertline" Anonymous system. Under no circumstances will a possible compliance violation report, which is made in good faith and which the employee reasonably believes, be the basis for disciplinary action against the employee making the report

Refer to the Kramer Ausenco Business Ethics Standard and the Kramer Ausenco Anonymous Whistleblower Policy for additional information.



**Frank Kramer**  
Chief Executive Officer

