

A. Prevention of Bribery and Illegal Practices

Prohibition of Bribery and Corrupt Practices

As an organisation with high ethical standards, we expect all staff to uphold the anti-bribery and anti-corruption regulations of every country where we do business. This means zero tolerance for all forms of bribery or corruption.

Uphold all applicable laws and corporate rules at all times. Whenever the laws or customs of the country where we do business impose stricter standards than our own anti-bribery regime, the higher standard prevails.

Avoid any activities that are, or could be perceived as, corrupt. Clearly communicate our anti-bribery policy to all staff working under your supervision.

Report bribery, corruption or malpractice concerns to the Whistle-blowing Panel. You will receive fair treatment and protection against reprisals.

Soliciting or Accepting Advantages

You could face prosecution if you solicit or accept any advantage (including money, gifts, commissions, loans, fees, rewards, offices, employment, contracts, services, sponsorship or other favour) as an inducement to, or reward for, performing or abstaining from performing any act in your capacity as an employee of the Corporation, or favouring or hindering any person in the transaction of any business with the Corporation.

Never solicit any advantages from clients, suppliers or persons having official dealings with the Corporation's business.

Always refuse a personal advantage offered to you, irrespective of whether the offeror has any business dealings with the Corporation, if the acceptance may cloud your objectivity, cause you to act against the Corporation's interests or lead to perceptions or allegations of impropriety.

You may accept an advantage only if all the following conditions are met and the other requirements in CGI 123 are complied with:

- (a) the acceptance would not influence the outcome of a business transaction;
- (b) it will not create an obligation to do something in return;
- (c) it is made in an open and transparent manner;
- (d) it is not recurring or systematic;
- (e) it is appropriate to the relationship and in accordance with local customs;
- (f) it is reasonable and proportionate, and are not lavish or excessive; and
- (g) it is of a nature and value that make refusal seem impolite or unsociable.

You may accept reasonable food and drinks for consumption on the occasion provided by contractors, business partners, or other parties whom you liaise with in a business capacity, provided that there will not be a perception that it will, or is intended to, compromise sound business principles.

You should decline invitations to entertainment that is lavish or excessive in nature or in frequency.

Offering Advantages

Legitimate day-to-day business can call for reasonable and proportionate offers of entertainment, sponsorship or gifts to professional contacts as symbolic acts of solidarity, felicitations or gratitude.

You should never offer advantages, whether directly or through a third party, to any person or company for the purpose of influencing such person or company in any dealings with the Corporation, or to any public official who has business dealings with the Corporation, when conducting the Corporation's business.

Facilitation payments or "grease payments" mean payments to local officials in order to speed up or facilitate actions the officials are already duty-bound to perform. The Corporation strictly prohibits any facilitation payment. It is also illegal in many of the places where we operate.

Get proper approval for expenses. Forms for different types of entertainment, sponsorships or gift expenses are available on the Intranet.

Maintain records for all entertainment, sponsorships, gifts, charitable donations or other benefits you have gained permission to offer.

Dealing with public or government departments, state-owned enterprises or foreign officials can involve a complicated array of laws and regulations. Take extra care in these situations to ensure we follow all rules applicable in respective jurisdictions governing the provision of any benefit, advantage or entertainment with such individuals or organisations.

Charitable donations are part of the Corporation's efforts to help the communities we serve. However, there should not be any link between any donation and a business decision. We do not use charity to influence contracts, transactional conditions or business outcomes.

Political-party donations from the Corporation will not be approved. Your personal political donations, funded with your own time, resources or assets are acceptable if they do not trigger any actual or perceived linkage with the Corporation.

B. Ethics and Compliance in the Workplace

Building an Ethical Culture

An ethical culture is built on a set of ingrained values and beliefs shared by every staff. It forms the basis for making business decisions. If compliance with regulatory requirements and observance of high ethical standards become a state of mind for staff at all levels, regulatory issues will be automatically addressed whenever they arise.

An ethical culture also enhances profitability, secures the trust and loyalty of stakeholders, improves operational efficiency and promotes a sense of mutual trust among staff.

As a manager:

You are a role model. Managers should uphold and enforce ethical principles, demonstrate ethical behaviour and set a good example. How you behave influences those around you, so strive to uphold the Corporation's Vision, Mission and Values at all times.

As a staff member:

You are a foundation stone in maintaining an ethical culture. Compliance throughout the Corporation is essential. The responsibility for compliance falls on each and every staff of the Corporation, from the supervisory ranks to operational levels.

Follow corporate policies and procedures and comply with our Corporation General Instructions and Corporation Notices. You are also expected to comply with all legal requirements, as well as follow all applicable divisional and departmental rules / procedures and reasonable instructions from supervisors or managers.

Violations of, or non-compliance with, any legal requirements, corporate policies or procedures erode our integrity, fairness, honesty and transparency. These values are the foundation of our business, and your ethical behaviour is the key to our success.

C. Equal Employment Opportunity and Harassment-free Workplace

We are committed to providing equal employment opportunities and a safe and harassment-free workplace for our staff. We do not tolerate any form of workplace harassment or discrimination on the grounds of gender, sexual orientation, disability, age, race, skin colour, national or ethnic origin, family status, or other characteristics in the places we operate. The Corporation's non-discrimination policy applies to recruitment, promotion, transfers, reward provisions, training and the like.

It is our corporate strategy to attract, retain and motivate high-calibre people and develop their potential to build competent, committed and successful teams. Knowledge, skills and competencies form the basis of our hiring practices, and we reward and promote staff for performance and for upholding our values.

Base employment decisions on genuine occupational requirements and candidates' qualification profiles, such as education attainment, prior work experience, professional or technical expertise, performance, leadership capability and other job-related competencies.

Use a fair system of recognition to reward and promote staff. Denying a promotion or development opportunity on the basis of gender, sexual orientation, disability, age, race, skin colour, national or ethnic origin or family status is discriminatory and prohibited.

Embrace the spirit of equality and the value of diversity. Treat all colleagues with respect.

Report to your Department Head, a manager of the Human Resource Management Department or the Whistle-blowing Panel if you experience or witness any form of discrimination or harassment.

Never engage in unwelcome sexual behaviour or make unwelcome sexual advances or sexual requests to a colleague that might offend, humiliate or intimidate him/her.

Never engage in abusive, bullying or other intimidating or offensive acts.

D. Conflicts of Interest

Act in the Corporation's best interests.

A conflict of interest situation arises when your private interests compete or conflict with the interests of the Corporation. Private interests include both your financial and personal interests, and include the interests of your family members, relatives and close personal friends.

You should avoid any actual or perceived conflict of interest and report to your superior at Section Head level or above when such a situation arises.

A perceived conflict of interest, even if it does not involve an actual abuse of position or actual gain, can be just as damaging as an actual conflict because it may undermine public confidence in us.

Declare any conflict or potential conflict of interest. If you become aware of a conflict of interest, or a transaction or relationship that may lead to one, inform your superior at Section Head level or above, or speak to the Legal & European Business Director in case a member of the Executive Directorate is involved.

You must not take for yourself a potential corporate opportunity that is discovered in the course of your employment or through the use of corporate property, information or position. You owe a duty to the Corporation to advance its interests when the opportunity to do so arises.

Business or Workplace Engagement

Business or workplace engagements with family members, relatives or close personal friends are likely to create actual or perceived conflicts of interest. To preserve corporate integrity and remove yourself from questionable situations, you should make every effort to avoid and declare possible conflicts.

Make arrangements to mitigate conflicts. Declare any private interest in any business, investment, financial approval or staff management situation that could involve a conflict of interest and, except where approval is given, excuse yourself from decision making. Acting with transparency helps avoid perceptions of conflict and improves our reputation.

Report to your superior and Human Resource Management Department if you have any immediate family members working in the Corporation. Immediate family members include husband, wife, parents, children, siblings as well as parents-in-law and sons/daughters-in-law.

Outside Work

Undertaking outside work, regardless whether remuneration is provided, goes against the conditions of employment unless prior written approval from your Department Head and Human Resource Management Department has been obtained. In general, no approval is required for unpaid volunteering or charitable work outside normal working hours, provided that there is no actual or perceived conflict of interest.

Apply for approval before accepting outside work and re-apply for approval annually. Make full disclosure of any conflicts of interest when applying for approval.

Undertaking part-time work with a contractor whom you are responsible for monitoring or providing advisory services to a competitor even without pay is a clear case of conflict of interest and must be avoided.

Financial Transactions with Colleagues or Business Partners

Conducting any financial deal with colleagues or corporate business partners may impact upon your ability to work objectively or in the best interests of the Corporation. Buying a coffee for a colleague is a sign of goodwill. Borrowing money for a large investment or engaging in frequent or high-stakes gambling is not.

Exercise good judgment in all your dealings with colleagues and business partners.

Financial transactions among co-workers, including personal loans, acting as a guarantor or entering into joint investments, or engaging in frequent or high-stakes gambling could make you seriously indebted to other staff, which creates conflicts of interest. Transactions of such nature are prohibited.

Financial dealings with corporate-related organisations or businesses, other than with banks or financial institutions or the Metro Credit Union and on prevailing market rates and terms, cannot be accepted.

E. Ethics in Business Relationships

Open and Fair Competition

Fair, open and honest competition is part of our corporate culture. Compliance with competition laws is core to our commitment to a high standard of business ethics and integrity across all of our businesses.

Our business involves bidding for work and partnering with suppliers or customers in many jurisdictions, and we must follow the applicable laws concerning competition in each of these places. Complying with all legal frameworks is important to our business.

Never assume a project or business cooperation is legal just because a government or a state-owned enterprise proposes it. Even state-owned companies may be subject to competition laws.

Consult the Legal - General Department with any questions about local competition laws. Each jurisdiction in which we operate has its own requirements.

Report any suspicion of anti-competitive behaviour to the Legal - General Department.

Bid rigging, price fixing or market sharing arrangements with competitors or contractors is unethical and illegal in most jurisdictions.

An agreement to boycott particular customers or suppliers runs contrary to our commitment to integrity, fairness, honesty and transparency in business.

Colluding with a competitor about the introduction of new technology or an innovation which we are both developing independently is a form of anti-competitive behaviour.

Discussing competitive business issues such as product prices, terms of sale, marketing or allocation of markets or clients at trade-association meetings could be interpreted as anticompetitive behaviour.

Procurement and Tendering

We strive to be fair, transparent and competitive in our procurement activities. Under normal circumstances, works, goods and services must be procured through competitive tendering undertaken by the Procurement & Contracts Department (P&CD).

Procurement and tendering activities should be based on the following principles:

- Impartial selection of capable and responsible suppliers and contractors;
- Effective use of competition;
- Selection of appropriate contract types according to needs;
- Compliance with laws, relevant regulations and contractual obligations;
- Adoption of an effective monitoring system and management controls to detect and prevent bribery, fraud or other malpractices in the processes of procurement and tendering; and
- Fair and equitable tender assessment and award criteria.

We ensure that fair opportunities are provided to capable, qualified suppliers, contractors and consultants who are interested in doing business with us, wherever they may operate. We properly value and pay them for the works, goods or services delivered.

Make purchase decisions solely in the Corporation's best interests.

Select suppliers and contractors based on the principle of compliance and lowest price in tenders and, where appropriate, consider other key attributes such as quality, safety, delivery or completion lead time, reliability, after-sales service, payment terms, and other factors pre-determined by the procurement teams.

Follow the spirit and intent of all contracts.

Biased or ambiguous prequalification and assessment criteria that allow incapable suppliers or contractors to be shortlisted or capable ones to be blocked are not permissible.

Releasing sensitive tender information to individual bidders or any non-approved parties is a breach of this Code.

Preparing fictitious quotations is a criminal offence.

Intentional split orders that circumvent controls are further examples of a bias towards individual suppliers or contractors.

Falsified records to cover up non-deliveries, short supplies or acceptance of substandard goods harm the Corporation and its reputation. It could also expose you to prosecution.

F. Responsibilities to the Community

Care for the Environment

The Corporation cares deeply about the environment and is committed to the continuous review of environmental issues relating to our business activities.

We have adopted a proactive approach to environmental management in all our construction and property development work as well as our railway operations around the world.

We recognise our responsibility to adhere to environmental standards that are legally compliant and appropriate to customer, staff and public needs.

Comply with environmental legislation and the Corporation's environmental policies and procedures when carrying out regular operations, construction or development projects.

Practise environmental awareness in your daily tasks, including the reduction of paper consumption and adoption of energy-saving measures.

Any failure to follow environmental regulations or procedures, or to report environmental hazards or accidents, affects our reputation as well as the community.

Community and Political Activities

We support community activities and introduced the "More Time Reaching Community" Scheme to encourage our staff to organise and participate in volunteer activities.

The Corporation also supports charitable activities, such as organising donations by staff, and providing financial and/or in-kind support to non-profit/social service organisations.

The Corporation does not make political contributions or provide assistance to political parties. We do, however, respect your right to participate in political activities or make political contributions in your personal capacity.

Ensure that your participation in any community or political activities, or the making of political donations, complies with the Corporation's policies and procedures and does not create a conflict of interest with your role and duties to the Corporation.

You should not promote personal political views during working hours to colleagues, contractors, customers or anyone else whom you come into contact in your capacity as a staff of the Corporation.

You should not use the Corporation's premises or assets in connection with the promotion of political views or activities.

G. Handling Corporate Information and Release of Corporate Information to External Bodies

Handling Corporate Information

We place great importance on protecting our information against unauthorised disclosure, use, modification, loss and/or corruption. It is your responsibility to protect classified information or other sensitive corporate information and be accountable for the confidentiality, integrity and security of the information which you may come into contact with in the course of your duties.

Exercise due care and comply with all applicable security policies, principles and instructions when handling classified or sensitive corporate information.

Use corporate information only for authorised corporate business or purposes.

Classified information that is no longer required should be destroyed and disposed of in accordance with proper procedures and legal requirements.

Never disseminate false or unconfirmed information concerning the Corporation. Report such information promptly to your supervisor or manager, who will then seek clarification.

Release of Corporate Information to External Bodies

We adopt an open approach to maintain good relations with the media and the communities we serve.

The Corporate Affairs Division is our official public representative. Do not give media outlets opinions or comments concerning the Corporation without the approval of the Corporate Affairs Division.

Refer any media enquiries or requests on corporate matters to the Corporate Affairs Division.

Seek approval from the Corporate Affairs Division before accepting any interviews on matters concerning the Corporation.

Prior approval should be sought from the Corporate Affairs Division before publishing any letters or articles concerning the Corporation's business or interests in a newspaper, journal or other public media.

H. Compliance and Enhancement

We have a firm commitment to comply with our Code, and you are required to understand and comply with it. We review the Code on a regular basis and notify all staff about any revisions that are made.

Managers and supervisors in particular are responsible to ensure that staff reporting to them understand the provisions of the Code and act in accordance with them.

Violation of the Code may result in disciplinary action, including termination of employment in serious cases. Cases of suspected corruption or other criminal offences will be reported to the relevant authorities.

A Whistle-blowing Policy is in place to encourage you to report actual or potential fraudulent or unlawful acts or noncompliance with the Corporation's policies that have or could have significant adverse financial, legal or reputational impact on the Corporation.

The Corporation may occasionally ask for your assistance when conducting internal investigations. These could involve your co-workers in the Corporation or third parties, such as contractors. We need your cooperation in all cases to maintain our high standards of integrity.

Understand and comply with the Code, and help your colleagues follow its guidance.

Report actual or potential breaches of the Code to a member of the Corporation's senior management (typically your Department Head).

Seek guidance from your supervisor or manager, the Human Resource Management Department or the Legal – General Department whenever you have questions or doubts about particular situations or business practices which concern you.

Confirm, if necessary, with the Legal - General Department that any new business practices you encounter and which concern you comply with the Corporation's policies and procedures and the Code.

Staff who wish to raise, or who have received, a complaint under the Whistle-blowing Policy should refer the matter to the Whistleblowing Panel via established channels of reporting stipulated in the Whistle-blowing Policy.

You should provide case specific information so that investigations can be conducted effectively.

You should disclose your name and contact details when "blowing the whistle". This allows us to contact you for further information if necessary. We shall make every effort to keep your identity and the information we receive confidential, so you can raise concerns in confidence without fear of disadvantage or discrimination.

Turning a blind eye to unlawful or unethical acts degrades the integrity, honesty and transparency of the Corporation. Always speak up when you see any wrongdoing.