



CHARTERED
PROFESSIONAL
ACCOUNTANTS
& BUSINESS
ADVISORS

CODE OF CONDUCT

This Code of Conduct reflects principles that are important to AJC. As a leading consulting firm that strives for excellence, we must apply these principles for our clients, each other and our respective communities in everything we do. The Code applies to all of us. We are all role models and together we must all actively strive to live up to these principles and be prepared to be accountable to each other for doing so.

Some attitudes are key to adopting the right behaviour. In living our values, we encourage:

- Open-mindedness and curiosity
- Innovation and creativity
- Collaboration and co-construction
- Collective ambition and team spirit
- Flexibility and agility

We encourage you to hold colleagues to account and speak up when you encounter ethical dilemmas or difficult situations. This is how we can make sure we all comply with the code. The code explains how we all should live our values in practice. It helps us to foster a great culture within which everyone wants to work. Applying this to our own behaviour is fundamental. The reputation and brand of AJC is demonstrated on the ground by each one of us every single day. If our conduct and behaviour falls short of our values, we risk damaging our reputation undermining the trust that people put in us. As a firm, we take all breaches seriously and undertake appropriate action to uphold the code wherever necessary.

This code is a practical guide to what is expected from us. It will help us navigate difficult choices and make the right decisions in line with our values. It explains how we live our values and highlights some of the mistakes and behaviours we should all avoid.

INTEGRITY

Our reputation as a firm and as individuals is built on trust, honesty, integrity, decency and adherence to strong moral principles and is the cornerstone on which our business, our livelihoods and those who rely on us, depend. Each of us, regardless of our actual or perceived seniority or position, plays a critical role in safeguarding the integrity of our business and our reputation.

We:

- do not cut corners;
- do not mislead;
- always tell the truth and do not hide anything;
- are not afraid to deliver unwelcome information to clients;
- reject inappropriate pressure from clients or others;
- promote a strong compliance culture at AJC through our words and actions;
- are conscious that our duties are owed to the client; in situations where our client is a corporate entity, our duties are owed to the corporate entity and not the individuals who work for the entity;
- ensure that our personal interests do not cloud our judgement in relation to interactions with suppliers and other third parties;
- are transparent in our dealings with regulators and government authorities;
- do the right thing, including “when no one is watching”;

- respect the confidentiality of our clients, employees and other people we work with;
- avoid situations that could create conflicts of interest;
- make sure that we do not become over dependent on any client;
- charge appropriate fees;
- never make a personal or undue profit from our relationships;
- do not accept personal benefits from clients, suppliers or subcontractors, unless the value is inconsequential and acceptance would not be perceived to impact our objectivity;
- do not use confidential information for personal gain;
- do not work with people or organisations whose values and practices go against our own. Nor do we accept engagements that help them avoid laws or their consequences;
- never engage in bribery or corrupt practices, in accordance with our anti-bribery and corruption policy.

DIVERSITY & RESPECT

We celebrate equity and diversity, which are essential for our pursuit of excellence. We embrace our differences. We ensure all voices are heard, and everyone is treated with fairness, dignity, respect, empathy and compassion. These form the basis on which we build relationships with others.

Together we create an environment where all feel welcomed and supported and where there are equal opportunities and equal access. We are sensitive to the need to balance the demands of working life with the needs for a private life away from work and personal well-being and we respect the personal circumstances of those with whom we work. We do not treat each other more or less favourably on the basis of race, colour, national or ethnic origin, religion, gender, disability, sexual orientation or age. We afford everyone the same human respect, irrespective of position, status or form of contribution. We recognise that we all have our own biases and we take account of these in our decision-making and interaction with others. The culture we want everyone within AJC to experience requires each of us to actively demonstrate our commitment to it. We always seek out and support a diverse population for every role or opportunity. Bullying and harassment have no place in our firm. Bullying and harassment includes slurs, offensive remarks, inappropriate jokes, and any other conduct, whether online, visual, verbal, physical or other, that could create an intimidating or uncomfortable work environment, including suggestive language or behaviour. This extends to all interactions and modes of communication, including electronic communication and social media.

We:

- value different opinions;
- listen carefully to consider different perspectives and respect every person's views;
- trust one another to make the right decision.
- set a good example by treating our colleagues with dignity and respect, and in the manner we would like to be treated ourselves;
- are aware of the impact our words and actions can have on others;
- are interested in, and demonstrate respect for, cultural differences; and seek to develop our understanding of these differences;
- show an understanding of the difficulties that others may face in their lives which we may not, and show empathy and support for others;
- create an environment in which each of us is able to bring our whole self to work and to discuss our personal circumstances if we choose to do so;
- trust the people AJC hires, and give them responsibility and opportunities to take on new challenges;
- set realistic expectations;
- help each other acquire new skills, expertise and experience;

- give each other honest and constructive feedback;
- whilst respecting rights to privacy, take the time to get to know the people in our teams;
- are aware that an invitation to socialise outside the office (whether during office hours, after hours or on a business trip) from a senior colleague to a more junior colleague may be perceived as an exertion of influence (also if well intentioned). We consider whether the invitation is appropriate and whether the junior colleague may feel compelled or pressured to accept and attend;
- where possible and appropriate, support flexible work arrangements and workplace adjustments, balancing business, team and personal needs and which are applied on an equal and fair basis amongst members of the relevant team;
- do not participate in gossip and other exclusionary behaviour and do not exclude colleagues from activities because we assume it's not for them;
- actively look for opportunities to show appreciation and give thanks for our colleagues' contribution;
- do not engage in intimidating behaviours of any nature or in any form (including physically, socially or online)

CHALLENGE & TECHNICAL EXCELLENCE

Embrace challenge, be open to change and together strive for excellence We want to foster an environment where everyone has the freedom to question the status quo. We proactively embrace challenge – no matter what level of seniority or position we are in. We provide each other with honest, thoughtful and constructive feedback, so that every member of the team can develop and thrive. Failure to provide genuine feedback is a missed opportunity for everyone. We always act with courage and conviction confident in our capabilities, skills and experience. We welcome change and are ready to do things differently, moving forward, innovating and improving. We are entrepreneurial and often first movers, leading and shaping the market through our vision for the future and our ambition. We are determined to achieve excellence together in everything we do. We know we are strongest as one global team and that collaboration and team creativity are critical to our success.

We:

- are open to new ideas, different points of view and to any proposed changes to ways of working (in each case, from all people at AJC regardless of their level of seniority);
- collaborate across teams and departments;
- put forward suggestions we think could improve the status quo including by challenging accepted norms, assumptions and language;
- balance risk and opportunity when making decisions;
- ask if we are not sure, air concerns and question assumptions;
- promote and encourage continuous learning;
- advise, listen, are open to questions and concerns from others, and guide when needed;
- try to create positive change by making suggestions and offering solutions whenever we challenge or provide constructive feedback;
- dare to fail;
- ask for feedback and give constructive feedback on a regular basis;
- have rigorous arrangements in place to make sure we always deliver top quality work;
- deliver what we promise;
- are focused on where we bring value to the client or to the public;
- only accept assignments we have the skills, experience and capacity to deliver to a high standard;
- do not accept engagements when unreasonable conditions are imposed
- seek feedback from our clients and use it to improve our service;

- welcome feedback from regulators and other stakeholders;
- innovate so that our services can meet our clients' changing requirements without compromising our values;
- transfer experience and skills by coaching our teams as we work;
- value collective success and help each other win and deliver new business;
- make sure the risks we take are assessed and properly controlled;
- encourage new ideas that improve the value and quality of our services, working environment and the tools our teams use;
- work every day to protect and improve AJC reputation.

CONFIDENCE

We build relationships with each other based on a shared trust and confidence that each of us has a personal and professional commitment to do the right thing. We are all encouraged to speak up and to create an environment in which we can be confident that our concerns and views will be taken seriously. If we witness bad, inappropriate, disrespectful, aggressive or unethical behaviour, as well as any potential or actual misconduct internally or externally (including in interactions with clients, service providers and other third parties), we should call it out and report it through the relevant channels. Our senior leadership is serious about making us all feel comfortable to challenge bad behaviour, wherever it comes from. Any retaliation or recrimination will not be tolerated.

We:

- foster a culture where everyone feels comfortable to speak up without fear of retaliation;
- are open and encourage openness about our and others' mistakes;
- speak up if we witness bad behaviour of any kind, including bullying, harassment or discrimination;
- are courageous and challenge exclusionary or discriminatory behaviour, whether it is intentional or not;
- encourage our colleagues to speak up if they believe they are experiencing bad behaviour and support them when they do;
- make appropriate reports internally if we fear an individual within a client organisation, supplier or other third party is acting unethically or inappropriately toward anyone at AJC.

DIGITAL RESPONSIBILITY

Data has become one of the world's most precious resources. It is transforming every profession and industry, including ours. We respect and protect confidential data and information obtained from, or relating to, clients or third parties. We only share information when there is a business purpose, and then do so in accordance with our policies, applicable laws and professional standards. We take proactive measures to safeguard our documents, computers and other data devices that contain personal or confidential data and information. We promptly report any loss, theft or inappropriate disclosure of personal or confidential information in accordance with applicable laws and our policies.

Protecting our system starts with each and every user.

We respect free time and make sure everyone can disconnect. We are careful when we send email out of working hours. We do not expect responses outside office hours and make sure that no one feels obligated to answer emails during their free time. When emailing at these times is an exceptional and unavoidable necessity, we discuss with the team, explain the reasons and define what is expected from the team members.

We:

- are all responsible for cybersecurity;
- avoid risky situations and protect client data as if it were our own;
- never disclose personal or professional confidential information on social media;
- avoid posting on social media anything that could harm our reputation;
- use email carefully and appropriately;
- make sure an email is sent to the right person;
- keep a professional tone in emails;
- make sure confidential information is handled appropriately;
- forward to the IT support team every strange email that seems to be a phishing or a scam;