AtkinsRéalis

Code of Conduct

2026

Terms in ***bold and italics*** are defined in a glossary that can be found, among other ***governance documents***, on our intranet. A Code of Conduct specific glossary is available at the end of this document. The most recent versions of our ***governance documents*** and definitions as found on our intranet have precedence over those found at any other location (including here).

AtkinsRéalis

Table of contents

Table of contents 3

Values that guide us 4

Message from the President and CEO 5

1 A culture of high ethical standards 6

1.1. AtkinsRéalis' commitment 6
1.2. Making the right decision 6
1.3. Speaking up 7

2 Living by our Code 8

2.1. We are all involved 8
2.2. Compliance 8
2.3. The way we behave matters 8
2.4. Our expectations of our managers 9
2.5. Governance, policies and procedures 9
2.6. Exceptions and deviations 9

3 Focusing on our people and our workplace 10

3.1. Mutual respect 10
3.2. Health, safety and environment 10
3.3. Drugs and alcohol 11
3.4. Global security 11

4 Avoiding conflicts of interest 12

4.1. Each of us is responsible 12
4.2. Disclosure 13

5 Adopting appropriate business practices 14

5.1. Antitrust and competition 14
5.2. Anti-bribery and anti-corruption 14
5.3. Third parties 16
5.4. Political contributions 17
5.5. Lobbying 17
5.6. Anti-money laundering and tax evasion 17
5.7. Trade compliance, export controls and anti-boycott 18
5.8. Insider trading 18
5.9. Accounting practices, record keeping and internal controls 19

6 Fostering sustainability and corporate social responsibility 20

6.1. Sustainability principles 20
6.2 Human rights 21
6.3. Community engagement 21
6.4. Donations and sponsorships 21

7 Protecting our assets 22

7.1. General principles 22
7.2. Protecting yourself from cyber attack 23
7.3. Protecting our data and equipment 24
7.4. Protecting the company when communicating 25

8 Reporting suspected misconduct and concerns 26

8.1. Duty to report 26
8.2. Non-retaliation 26
8.3. Internal investigations 27

9 Contact 28

Glossary 29

Values that guide us

Our values are the essence of our company's identity. They represent how we act, speak and behave together, and how we engage with our clients and stakeholders.

Safety

We put safety at the heart of everything we do, to safeguard people, assets and the environment.

Integrity

We do the right thing, no matter what, and are accountable for our actions.

Collaboration

We work together and embrace each other's unique contribution to deliver amazing results for all.

Innovation

We redefine engineering by thinking boldly, proudly and differently.

Excellence

We are proud to do our best, achieve high standards, creating environments where all can thrive.

Message from the President and CEO

Dear colleagues,

At AtkinsRéalis, who we are is defined by how we act, not just what we do. Every moment—on-site, in meetings, or virtual—is an opportunity to earn trust, show consideration, and collaborate with colleagues and stakeholders. These actions define our culture and make our workplace better for all.

Our Code of Conduct is more than rules. It guides the choices we make in complex situations, helps us decide with integrity—not just when things are straightforward, but especially when they're not—and keeps us aligned with the high standards we set for ourselves. If you're unsure about anything, ask your manager, Integrity Officer or HR representative.

Speak up when something feels wrong. Your actions protect colleagues and reinforce our values. Every question or concern matters because silence leaves issues unresolved—that's why we want—and need—to hear from you. You are always free to remain anonymous when you do so and will always be protected against retaliation when you come forward.

Trust is earned when we show fairness and accountability every day:

- Deliver on commitments—every time.
- Listen to every voice—thoughtfully.
- Act honestly—even when it's hard.

I ask each of us to live our Code—embracing its spirit, words, and intent. The choices we make define our environment and shape the legacy of AtkinsRéalis.

Thank you for helping build a workplace grounded in trust, respect, and responsibility—one where everyone can belong, take pride, and thrive.

Ian L. Edwards
President and
Chief Executive Officer

1

A culture of high ethical standards

1.1. AtkinsRéalis' commitment

AtkinsRéalis promotes integrity and the highest ethical standards in all aspects of its business. To make sure we all live by our values and comply with the obligations described in our ***Code of Conduct*** (our "***Code***"), ***AtkinsRéalis*** is committed to:

- Fostering and maintaining a culture of integrity;
- Creating appropriate awareness and understanding of our ***Code*** at all levels;
- Setting up measures to prevent, detect and respond to unethical or non-compliant behaviour;
- Providing globally available support, information and resources to help with the application of our ***Code***;
- Promoting a speak-up culture where our voices are heard and where we are empowered to raise ethical concerns;
- Protecting from ***retaliation***, anyone who comes forward in good faith with their concerns;
- Encouraging the continuous improvement of our governance standards; and
- Fostering sustainability in governance, operations, and decision-making to ensure our actions today create a better tomorrow.

For more information

Consult our core focus areas.

1.2. Making the right decision

Our ***Code*** is not a collection of rules. It is not intended to cover every situation we might encounter. Its purpose is to help us use our judgment to make the right decisions.

Some decisions are easy to make. However, when we are unsure of any work-related actions or decisions, we must ask ourselves the following questions:

- Does it comply with our values, our ***Code*** and our ***governance documents***?
- Is it legal?
- Could it put anyone's health, safety or well-being at risk?
- Is it fair, ethical and morally acceptable?
- What is my "gut feeling" telling me?
- How would it look if it were reported on the news or another public forum?
- Could it negatively affect my reputation or that of my colleagues?
- Could it be perceived as disrespectful?
- Could it be perceived as resulting in undue influence?

If the answer to any of these questions is not clear, or if we are uncomfortable with our answer, we must seek guidance from our ***managers*** or Integrity Officers.

1.3. Speaking up

We can all contribute to maintaining our high ethical standards and culture by speaking up whenever we encounter a situation that might raise questions about integrity or misconduct.

The reporting process is described in the last section of our ***Code***. Although many reporting channels are available, we can always use the Reporting Line (operated by an independent third-party provider) to express our concerns.

We will always be protected against ***retaliation*** when we come forward in good faith with our concerns.

For more information

Consult our scenario about speaking up.

Watch our video.

2

Living by our Code

2.1. We are all involved

Our ***Code*** is meant to maintain integrity and transparency in the conduct of our business and in our relationships with others.

It applies to all personnel including ***employees, individual consultants, loaned personnel, officers***, and members of the ***boards of directors*** of ***AtkinsRéalis***.

Complying with our ***Code*** and our ***governance documents*** is part of the terms and conditions of our relationship with ***AtkinsRéalis***. We are required to complete a certification process on an annual basis to ensure that our ***Code*** is understood and applied in our daily activities.

We expect any ***third party*** we do business with to respect our values and high ethical standards.

Our ***Code*** is reviewed and updated annually and can be found on our website at https://www.atkinsrealis.com/en/about/integrity.

2.2. Compliance

As we operate all over the globe, we are subject to the laws of many countries, and we must comply with all of them.

When local laws allow behaviour that is not allowed by our ***Code*** or ***governance documents***, our ***Code*** and ***governance documents*** prevail.

We must always:

- Consult our legal team before taking any action if we have questions about understanding or applying laws or regulations.

2.3. The way we behave matters

Regardless of our location and role, we all represent ***AtkinsRéalis***. How we interact with others and our surroundings is what defines us as a ***company***. Acting in accordance with our values and adhering to our ***Code*** and ***governance documents*** protects our reputation and our future. It determines whether ***clients*** and ***business partners*** want to do business with us, and whether talented people choose a career with us. Because we care about our people, our ***clients***, our planet and our reputation, we take the necessary steps and actions to address non-compliant behaviour. Each of us has a part to play in maintaining and enhancing our reputation as an industry leader.

We must always:

- Do what is right;
- Comply with our ***Code***, our ***governance documents***, and applicable laws and regulations;
- Lead by example by adopting behaviours that support our shared values;
- Act with integrity and honesty;
- Take responsibility for the things we control and the decisions we make, and encourage others to do the same;
- Take responsibility for delivering on our promises;
- Look out for our own health, safety and security, and that of others;
- Treat others with respect and dignity; and
- Protect the communities we work in by considering the environmental and social impact of our actions and striving to make decisions that support sustainable development.

2.4. Our expectations of our managers

Our ***managers*** have additional responsibilities under our ***Code***.

They are responsible for:

- Promoting a culture of integrity and accountability;
- Leading by example;
- Helping their teams understand and comply with our ***Code*** and ***governance documents***;
- Enabling and assuring participation in related training and certification;
- Ensuring a positive work environment in which people are treated with dignity and respect;
- Supporting and protecting individuals who, in good faith, raise a concern or report potential unethical or non-compliant behaviour; and
- Speaking up when they hear about or suspect potential misconduct.

For more information

Consult our Integrity Report.

2.5. Governance, policies and procedures

We work with a governance framework that provides direction and guides our actions and decision-making. Our governance framework is made of ***statements, commitments, policies, procedures, standards, work instructions, guidelines*** and many other types of ***governance documents***.

We must always:

- Comply with the principles established in our ***governance documents***;
- Use the most current version of our ***governance documents*** available on our intranet; and
- File a ***deviation*** request when we can't comply with these principles (see next section).

For more information

Consult our policy on our Governance Framework.

2.6. Exceptions and deviations

We might encounter situations where we can't fully comply with our ***Code*** or one of our ***governance documents***. In these cases, we must obtain approval by completing a ***deviation*** request before taking any action.

For example, these are situations where it would be necessary to request a ***deviation***:

- Approving ***transactions*** above what is permitted by our ***governance documents***; or
- Booking travel arrangements without using the authorized travel agency.

This helps us ensure that ***deviations*** are documented and approved at the appropriate level. It also helps us with reviewing our ***governance documents*** when necessary.

We should not ask for a ***deviation*** when we suspect or know that someone has not respected our ***Code*** or any other ***governance document***, law or regulation. These situations must be reported as explained in Section 8.1.

For more information

Consult our policy on our Governance Framework.

Watch our video.

3

Focusing on our people and our workplace

3.1. Mutual respect

At ***AtkinsRéalis***, we show respect for everyone. We interact with individuals of various backgrounds and points of view. This diversity is a great asset that contributes to our capacity to innovate and reinvent ourselves.

We engage in respectful and constructive communication and listen to others to maintain a positive and psychologically safe work environment. We are committed to creating and maintaining an inclusive culture where everyone belongs, can be their true self and can reach their full potential.

The preservation of our dignity, privacy and rights is a priority for us. We have zero tolerance for behaviour or actions that amount to ***discrimination***, ***harassment***, or ***violence***.

> For more information
>
> Consult our procedure on Work Related Discrimination, Harassment and Violence.

3.2. Health, safety and environment

Everyone's safety is important to us. We are committed to doing business in a safe, ethical, environmentally and socially responsible manner.

We make sure that the applicable ***workplace*** health, safety and environmental legislation is treated as a minimum standard in all areas where we conduct business, and we are committed to ensuring that the buildings, infrastructure and services we deliver are designed with the safety of our personnel, contractors, end users, and the general public in mind.

To ensure ***physical*** and ***psychological safety*** in our ***workplace***, we implement a health, safety and environment program based on hazard recognition, risk assessment and elimination of hazards.

We are all accountable for everyone's safety.

> For more information
>
> Consult our BlueBook on health, safety and the environment.

3.3. Drugs and alcohol

We must never:

- Be impaired by ***drugs*** or ***alcohol*** while on duty;
- Buy or sell ***drugs*** at work;
- Buy or sell ***alcohol*** at work; or
- Consume or serve alcoholic beverages on ***AtkinsRéalis*** premises except as authorized by a member of the ***Executive Committee*** and always in accordance with applicable local laws.

For more information

Consult our BlueBook on health, safety and the environment.

3.4. Global security

We are committed to protecting our people, assets and information wherever we operate and during business travels.

We must never:

- Knowingly engage in any business activity that presents a security risk that cannot be properly managed; or
- Do business with security providers who don't adhere to our principles and security standards.

For more information

Consult our policy on Global Security.

4

Avoiding conflicts of interest

4.1. Each of us is responsible

We must ensure that we always act in the best interest of ***AtkinsRéalis*** to avoid any ***conflicts of interest***.

Our judgment and actions must never be influenced by secondary interests that would benefit us, an ***immediate family*** member, or someone with whom we have a ***close personal relationship***.

A ***conflict of interest***, whether it is ***actual***, ***potential*** or ***perceived***, can expose ***AtkinsRéalis*** to certain risks, such as legal ***liability*** or reputational damage.

When an ***actual***, ***potential*** or ***perceived conflict of interest*** exists, management will assess the situation and implement measures to address the situation if required. Information will be kept confidential and available only to the individuals involved in managing that ***conflict of interest***.

We must always:

- Act and make decisions in the best interest of ***AtkinsRéalis*** to avoid any ***conflicts of interest***;
- Completely and truthfully disclose, in a timely manner, all information related to an ***actual***, ***potential*** or ***perceived conflict of interest***; and
- Abide by any measure implemented to address a ***conflict of interest***.

We must never:

- Be guided in our actions or decisions by our own personal benefit or that of an ***immediate family*** member or someone with whom we have a ***close personal relationship***;
- Supervise an ***immediate family*** member or someone with whom we have a ***close personal relationship***;
- Be in a position where we cannot be objective concerning an ***immediate family*** member or someone with whom we have a ***close personal relationship*** by doing business with a ***company*** that they fully or partially own or work for; or
- Proceed when we know or we are unsure if a situation constitutes a ***conflict of interest***.

For more information

Consult our procedure on Conflicts of Interest.

4.2. Disclosure

We must disclose all ***conflicts of interest*** and changes to existing ***conflicts of interest*** as they arise by completing a Conflict of Interest form. Annually we must complete the Conflict of Interest Certification module to ensure ***AtkinsRéalis*** is aware of our personal ***conflict of interest*** status.

We must always disclose situations where:

- We are engaged or will be engaging in ***secondary employment***;
- We accepted or will be accepting a directorship or non-executive position with a third-party organization;
- We established or will be establishing a business relationship with a ***competitor***, ***business partner***, ***supplier*** or ***client***;
- We own or plan to own a ***significant financial interest*** in a ***competitor, business partner***, ***supplier*** or ***client***;
- We have an ***immediate family*** member who currently works at ***AtkinsRéalis***, or we are in a ***close personal relationship*** with someone who does;
- We are/were a ***government official*** in the last five years; or
- We have an ***immediate family*** member or someone with whom we have a ***close personal relationship*** who is/was a ***government official*** in the last five years.

Other situations not listed above, where our judgment and decision-making are or might be influenced by professional or personal interests, could also constitute a ***conflict of interest*** and require disclosure. When in doubt, we disclose these situations by filling out a Conflict of Interest form.

Standard mitigation measures are added to the form based on the type of ***conflict of interest*** that is disclosed. Our ***managers*** can add any additional measures they believe are required to appropriately manage the risk(s) posed by the ***conflict of interest***.

5

Adopting appropriate business practices

5.1. Antitrust and competition

We must engage in fair, competitive business practices that comply with antitrust and competition legislation. These laws are generally designed to uphold free and open competition in the marketplace.

We must never discuss, collude or agree with ***third parties*** to:

- Fix or control prices, terms or conditions;
- Restrict competition or dealings with ***suppliers*** or ***clients***;
- Share or receive ***confidential information*** with/from current or potential ***competitors*** or ***clients*** or any other unauthorized parties;
- Divide or allocate ***clients***, markets or territories; or
- Choose not to submit a bid, withdraw a bid or submit an artificial bid to influence the outcome of a bidding process.

Entering ***joint venture*** agreements with our ***competitors*** in order to pursue ***project*** opportunities is not a violation of antitrust and competition legislation unless it is deliberately meant to reduce competition.

For more information

Consult our procedure on Compliance.

Consult our scenario about bundled offers.

5.2. Anti-bribery and anti-corruption

We are committed to conducting business with integrity and we prohibit ***corruption*** and ***bribery*** in all their forms. We are responsible for educating ourselves on how to recognize signs of corrupt activities. Our ***company*** also offers training material on the subject.

We must never:

- Get involved in corrupt activities, whether directly or indirectly; or
- Accept, request, offer, promise, give or authorize a bribe, kickback, payment or anything that can be considered as such (***gifts***, entertainment, employment, contracts or ***benefits*** of any kind) to or from any ***third party*** with the intent to obtain an improper or unfair advantage, retain business or influence that ***third party***'s actions, including during the bid process.

For more information

Consult our procedure on Compliance.

5.2.1 Facilitation payments

Facilitation payments are illegal in many jurisdictions where we operate and go against our culture of integrity. This is why we don't allow them under any circumstances.

We must never:

- Make ***facilitation payments*** in order to obtain or accelerate a service to which we are already entitled.

Facilitation payments must not be confused with payments made in order to prevent an imminent and serious threat to our health, safety or welfare, or that of a person we travel with. Any such payment would be considered as an extortion payment and would be permissible under such circumstances. We must report all extortion payments to our ***manager***, Integrity Officer and the appropriate regional security director as soon as possible. This helps us with recording ***transactions*** accurately and reporting them to the relevant authorities.

For more information

Consult our Facilitation Payments Reminder.

Consult our scenario about facilitation payments.

5.2.2 Gifts and hospitality

Gifts and hospitality are part of normal business practices, but can, in certain circumstances, be considered as forms of ***bribery*** or unjust influence.

We can offer, accept or exchange ***gifts and hospitality*** if we respect the following principles.

We must always:

- Make sure that ***benefits*** are reasonable in value, auditable and appropriate to the occasion and the roles of those involved;
- Be honest and transparent when discussing or exchanging ***benefits***;
- Record given ***benefits*** accurately in our books and records;
- Submit an Integrity Review request when applicable; and
- Exercise good judgment, especially when offering ***benefits*** to ***government officials*** (see Section 5.3.2), as they are often subject to stricter rules, regulations and laws.

We must never:

- Accept or offer ***benefits*** that are illegal, indecent or offensive in any way, involve gambling, or otherwise violate our ***Code*** or ***governance documents***;
- Exchange ***benefits*** for any improper advantage or influence over a business relationship;
- Request ***benefits*** from a ***third party***; or
- Exchange ***benefits*** when it raises questions about ***conflicts of interest***.

For more information

Watch our video about gifts and hospitality.

Consult our scenario about gift giving.

5.3. Third parties

Third parties typically include:

- ***Clients***;
- ***Competitors***;
- ***Suppliers/Counterparties***;
- ***Government officials*** (see Section 5.3.2); and
- ***Business partners*** (see next section).

We are committed to dealing transparently with ***third parties***. We want to work with ***third parties*** who share our values and culture of integrity. We expect them to embrace and implement practices that are consistent with our ***Code***.

We must never:

- Use a ***third party*** to do indirectly what our ***Code*** doesn't allow us to do.

For more information

Consult our procedure on Compliance.

Consult our Counterparty Code of Conduct.

5.3.1 Business partners

Business partners are ***third parties*** who enter in a business relationship with and act on ***behalf of AtkinsRéalis***. The actions performed by these ***third parties*** while they participate in our business activities have a direct impact on us. We could be held liable for their actions as if we had performed them ourselves. This is why we must ensure that individuals or organizations acting ***on behalf of AtkinsRéalis*** conduct themselves accordingly.

We must always:

- Carefully select ***business partners*** who share our values and culture of integrity;
- Make sure that an engagement risk assessment (ERA) is performed and duly approved for each of our ***business partners***; and
- Continue to properly monitor our ***business partners*** throughout our business relationship with them.

5.3.2 Government officials

Because of the nature of our business, we regularly interact with ***government officials***. We must be aware that more restrictive rules apply in these situations. Activities that may be acceptable when dealing with private sector employees could be inappropriate or illegal when dealing with ***government officials***. This is why we must exercise extra caution.

We must always:

- Avoid offering any personal ***benefits*** to a ***government official*** unless it is clearly permissible under applicable laws and regulations and fully compliant with our ***Code*** and ***governance documents***;
- Avoid giving anything of value to anyone if we have reasons to believe that it will be passed on to a ***government official***; and
- Consult with Human Resources before engaging in potential employment opportunities with current or ***former government officials***, members of their ***immediate family*** or someone with whom they have a ***close personal relationship***.

For more information

Consult our scenario about government officials.

5.4. Political contributions

We must never make ***political contributions on behalf of AtkinsRéalis*** to political candidates, parties, organizations or any other political entity, at any level of government.

We can engage in personal political activities as long as we never:

- Use our ***company's*** name in a manner that might suggest the ***company*** endorses the political activity;
- Use our ***company's*** time, funds, property, resources or ***employees*** lists;
- Engage into activities that might constitute a ***conflict of interest*** unless properly disclosed (see Section 4.2); or
- Claim refund from the ***company*** for personal contributions.

For more information

Consult our procedure on Compliance.

5.5. Lobbying

AtkinsRéalis engages with ***government officials*** and public representatives in an honest, transparent and accountable manner. We are committed to building and maintaining constructive, positive relationships in the public sector.

Many jurisdictions have enacted laws and regulations that restrict or require various levels of disclosure of ***lobbying*** activities.

We must always:

- Coordinate all ***lobbying*** activities with Strategy, Growth and External Relations before taking any action.

For more information

Consult our Lobbying page on our intranet

5.6. Anti-money laundering and tax evasion

We are committed to the prevention of ***money laundering*** and ***tax evasion*** everywhere that we operate.

We must always:

- Act carefully to prevent ***AtkinsRéalis*** from being involved or used in ***money laundering***, facilitation of ***tax evasion*** or other criminal activities;
- Apply the appropriate level of due diligence before entering a relationship with a ***client*** or any other ***third party***; and
- Recognize and monitor potential warning signals that could help detect unusual or suspicious activity.

We must never:

- Engage, facilitate or have ***AtkinsRéalis*** associated with any form of ***tax evasion*** anywhere in the world; or
- Be complicit in facilitating a ***third party*** to evade ***taxes*** in any jurisdiction.

For more information

Consult our procedure on Compliance.

Consult our scenario about tax evasion.

5.7. Trade compliance, export controls and anti-boycott

Laws governing trade are complex and violations can lead to significant fines, blacklisting and withdrawal of eligibility for simplified import and ***export*** procedures.

We must always:

- Conduct our activities in compliance with the ***export controls***, ***economic sanctions*** and anti-boycott laws and regulations of all the jurisdictions where we do business;
- Adhere to our ***procedure*** on trade compliance, especially when working on international opportunities and ***projects***; and
- Contact the Integrity, Legal Affairs or Procurement teams when guidance is required.

For more information

Consult our procedure on Trade Compliance.

5.8. Insider trading

We may have access to information that is not yet known to the public and that could have an impact on the price of ***AtkinsRéalis***' shares or those of our ***clients***, ***suppliers*** or ***joint venture*** partners. Inside information may include non-public financial information, sales and earnings figures, plans for dividend changes or new financing, acquisitions, major new contracts or other financial matters, changes in senior management, claims and litigation, etc.

Trading on ***AtkinsRéalis securities*** or those of any of our ***clients***, ***suppliers*** or ***joint venture*** partners — or advising others to do so — while we have inside information is not only prohibited by our ***Code***, but it is also illegal and may constitute a serious criminal offence. Members of the ***Board of Directors*** and ***officers*** of ***AtkinsRéalis***, and some ***employees***, may have additional responsibilities under the law.

We must never:

- Disclose inside information to anyone, including ***clients***, ***suppliers***, ***consultants***, family, friends, financial analysts and journalists.
- Engage in any ***securities transactions*** while having inside information.

For more information

Consult our policy on Disclosure and Insider Trading.

5.9. Accounting practices, record keeping and internal controls

Accurate, complete and reliable records are crucial to our business as they guide decision-making and strategic planning. They are the basis of our financial reports and are necessary to fulfill ***AtkinsRéalis***' obligation to provide full and truthful disclosures to investors, ***stakeholders*** and regulatory authorities.

We must always:

- Prepare business records, ***expense reports***, timesheets, ***invoices***, vouchers, payrolls, ***personnel*** records and any other reports in a timely manner, with care and honesty;
- Get all ***transactions*** approved in accordance with our Levels of Authority ***policy***;
- Comply with internal controls, financial reporting and accounting principles;
- Support all ***transactions*** with proper documentation;
- Ensure that no ***transaction***, asset, ***liability***, suspected ***liability***, claim, potential claim, litigation or other financial information is kept from management, Legal Affairs, Finance, Internal Audit or ***external auditors***;
- Make all necessary efforts to resolve issues and concerns raised by internal and external audit reports and ***peer reviews***;
- Immediately report any unrecorded funds or assets, suspicious accounting and false or fictitious entries in our books and records (see Section 8.1);
- Disclose any known inaccuracies, misrepresentations or omissions to relevant ***stakeholders***;
- Ensure that there are no unrecorded ***bank accounts*** or assets; and
- Ensure that we comply with our Global Data Retention Schedule ***work instruction*** before destroying any records.

We must never:

- Use our ***company***'s funds or assets for unlawful or improper purposes;
- Make any false or misleading entries in our ***company***'s books and records (commit ***fraud***);
- Make improper assumptions or assessments that would result in inaccurate revenue recognition; or
- Make improper or unusual financial arrangements with a ***third party*** (such as over or under invoicing).

We expect ***managers*** and ***officers***, as well as those responsible for accounting and record keeping, to be vigilant, not only in ensuring that the principles as described above are respected, but also in overseeing the proper use and safeguarding of ***AtkinsRéalis***' assets.

For more information

Consult our Finance policy.

Consult our scenario about fraud and falsification of documents.

6

Fostering sustainability and corporate social responsibility

6.1. Sustainability principles

At ***AtkinsRéalis***, sustainability is a guiding principle that underlies our operations, decisions, and interactions. Our commitment extends beyond compliance—it is about creating shared value by balancing environmental, social, and economic priorities to build a resilient and inclusive future. We are dedicated to fostering environmental stewardship, social responsibility, and economic resilience in our business practices. This means reducing our environmental footprint, supporting inclusive and equitable communities, and creating long-term value for all ***stakeholders***.

We consider the sustainability impact of our actions and as a collective contribute to building a better future, through ***project*** delivery, ***stakeholder*** engagement, or daily ***workplace*** choices, sustainability, which is a shared responsibility and a reflection of our values in action.

Sustainability also includes the responsible use of resources. We are all stewards of our environmental footprint—whether through energy use, travel, procurement, or digital practices. We must be mindful of how our daily actions contribute to our broader sustainability goals.

For more information

Consult our Sustainability intranet page.

Consult our Sustainability Policy Statement.

6.2. Human rights

We believe that everyone should be treated with dignity, fairness and respect. We support the protection of ***human rights*** throughout our operations. We work towards preventing ***modern slavery*** and ***human trafficking***, including in our supply chain. We also work towards protecting individuals working directly or indirectly for ***AtkinsRéalis*** from any form of ***modern slavery*** and ***human trafficking***.

We must always:

- Allow our ***employees*** the choice to leave their employment freely upon reasonable notice;
- Provide our ***employees*** with training to help them recognize situations where a risk of ***modern slavery*** and ***human trafficking*** exists;
- Ensure that our supply chain is free of any form of ***modern slavery*** and ***human trafficking***;
- Require that our ***counterparties*** do the same; and
- Recognize Indigenous rights and culture, by acting respectfully and dealing fairly with Indigenous communities, businesses, entities and community members in all business activities.

We must never:

- Engage in activities that encourage ***human rights*** abuses, ***modern slavery*** and ***human trafficking***, ***child labour***, ***bonded labour***, or ***forced labour***; or
- Knowingly do business with ***counterparties*** who do not adhere to the principles regarding ***human rights*** put forward in our ***Code***, regardless of local legislation and customs.

For more information

Consult our policy on Human Rights.

Consult our Modern Slavery and Human Trafficking Statement.

Consult our Counterparty Code of Conduct.

Consult our scenario about modern slavery.

Consult our Commitment to Indigenous Peoples.

6.3. Community engagement

We are committed to strengthening sustainable benefits for the local communities in which we live and work. We build strong relationships by being attentive to communities' needs, expectations and uniqueness. We collaborate with local non-governmental organizations, governments and private sector partners to develop and implement programs that create social value.

We empower local workers, companies and communities through training, mentorship and capacity building. We transfer valuable expertise and implement initiatives to enhance ***project*** employment and procurement opportunities.

For more information

Consult our Annual Integrated Report.

6.4. Donations and sponsorships

We use ***donations*** and ***sponsorships*** to support initiatives that stimulate progress and build the future of our societies. Our goal is to have a positive impact on communities, learning and innovation. This is why we contribute primarily to educational causes and initiatives that support the next generation of talent. We also contribute to charities that build caring communities in the regions where we operate.

We are all encouraged to volunteer or get involved in our communities. We are also encouraged to use our professional skills and experience to do so.

We must always:

- Be aware that ***donations*** and ***sponsorships*** may present ***corruption*** risks. They could be perceived as a way to seek or obtain an improper advantage.

For more information

Consult our procedure on Donations, Sponsorships and Employee Involvement.

Consult our scenario about raising funds for a good cause.

7

Protecting our assets

7.1. General principles

We all share the responsibility and legal duty to protect ***AtkinsRéalis***' assets, including ***data***, as well as that of our ***clients*** and ***business partners***. Failure to safeguard this information can expose our organisation to serious consequences, including regulatory fines, reputational damage, and the potential loss of ***clients***.

It is essential that every ***employee*** understands and upholds this responsibility to maintain trust and ensure the continued success of our business.

Confidential information is one of our most important assets. It is essential that ***confidential information*** such as financial results, business plans, technical information, design outputs, ***intellectual property*** and ***personal data*** is used and distributed appropriately and responsibly.

This is achieved through the following preventative measures:

- **Cyber security** is a key aspect of our business. Ensuring that we have robust cyber security measures is fundamental to maintaining our ***clients***' trust. We are required to complete a training module on an annual basis to remain up-to-date with our cyber security requirements.
- **Data compliance** means adhering to the rules, regulations, and principles governing the ***data lifecycle*** of our ***data***. It ensures that ***AtkinsRéalis*** handles ***data*** in a legally compliant and responsible manner, protecting the privacy and rights of individuals. Effective ***data governance*** and appropriate ***personal data processing*** is vital to the continued success of our business and to maintaining the trust of our ***clients***, ***personnel*** and ***stakeholders***. We are committed to the continuous improvement of a ***data governance and compliance framework*** to ensure that ***personal data*** is handled appropriately, consistently and in accordance with applicable ***data protection and privacy laws***.
- ***AtkinsRéalis*** provides the ***information technology equipment*** we need to conduct our business, including email, information ***systems***, software, internet and network access. These resources remain the exclusive property of ***AtkinsRéalis***.
- Patents, copyrights, trademarks, designs, names, logos, photos, videos and any other form of ***intellectual property*** created or modified during our relationship with ***AtkinsRéalis*** remains its exclusive property. This includes any ***intellectual property*** developed outside of our relationship with ***AtkinsRéalis*** that results from the use of ***confidential information***. Additionally, we only use ***intellectual property*** owned by a ***client*** or a ***third party*** with whom we have a contractual relationship in accordance with such rights and contracts.
- When ***communicating externally***, we must take a stepback before expressing our opinion, commenting or providing information regarding ***AtkinsRéalis***. We are encouraged to always be our ***company's*** ambassadors.

Please read the following to understand your responsibilities and the potential impact of your actions.

For more information

Consult our procedure on Acceptable Use of Technologies.

Consult our procedure on Cyber & Data Security.

7.2. Protecting yourself from cyber attack

We must:

- Be familiar with our data governance principles;
- Be aware of our own rights and obligations;
- Be aware of what represents your ***personal data;***
- Handle ***personal data*** in line with our internal data privacy requirements (or policies etc.);
- Be aware of our cyber security commitments; and
- Be alert for suspicious communications (e.g., emails, online meetings & chats, text messages, telephone calls).

We must never:

- Access or save inappropriate information, ***data*** or images with our ***information technology equipment.***

For more information

Consult our policy on Cyber Security.

Consult our procedure on Acceptable Use of Technologies.

Consult our procedure on Cyber & Data Security.

7.3. Protecting our data and equipment

We must always protect:

- ***Confidential information***, including ***personal data*** and ***intellectual property***, even after the termination of our relationship with ***AtkinsRéalis***;
- The integrity of our ***information technology equipment***; and
- Our data and ***information technology equipment*** from damage and unauthorized access.

We must always use:

- ***Personal data*** only for the purpose for which it was collected or to meet our legal or regulatory obligations;
- Only our work account and email address to send or receive work-related electronic communications (e.g. emails or Teams messages);
- Our data and ***information technology equipment*** responsibly, appropriately and ethically; and
- Only authorized ***information technology equipment*** and software on ***AtkinsRéalis***' networks, ***systems*** or devices

We must always:

- Comply with the established rules to properly classify and protect the information we are entrusted with;
- Undertake the mandated cyber and data security training at induction and annually thereafter;
- Act in accordance with internal ***governance documents*** and any external contractual obligations when using ***data*** in emerging technologies, such as machine leaning or ***artificial intelligence***;
- Comply with our data retention schedule and, where appropriate, external retention requirements;
- Understand what ***personal data*** is and how we should handle it;
- Consider data privacy at the beginning of any new ***project*** or initiative (internal or with ***clients***) that will involve ***personal data*** by undertaking a Privacy Impact Assessment;
- Make sure that ***personal data*** is protected, secured, kept confidential and retained only for as long as is necessary to achieve the original processing purpose or to satisfy our legal and regulatory requirements;
- Contact the Data Compliance Team at datacompliance@atkinsrealis.com when we need support;
- Get explicit consent from the ***intellectual property*** owner before using ***intellectual property*** owned by a ***client*** or a ***third party***;
- Report actual or suspected loss, misuse or breach of information immediately; and
- Report theft, damage, loss or inappropriate use of assets.

We must never:

- Use assets for personal or ***third party*** profit;
- Upload ***confidential information*** to online services such as cloud storage, search engines, translation tools or ***artificial intelligence*** services unless this specific use has been approved by ***AtkinsRéalis' IT Services***;
- Use or access the ***confidential information*** or ***intellectual property*** of ***clients***, ***competitors***, ***business partners*** or former employers without their prior written consent;
- Attempt to bypass ***AtkinsRéalis***' cyber security measures;
- Use ***our information technology equipment*** to exchange, store or process content that:
  - Is prohibited by law (such as the illegal downloading, storage or installation of material protected by copyright laws);
  - Has potential to cause cyber security or ***personal data*** breaches;
  - Could be perceived as being racist, defamatory, discriminatory, violent, sexist, pornographic or as engaging in ***harassment***;
  - May tarnish ***AtkinsRéalis***' reputation;
  - Benefits specific ***employees*** or individuals without contributing to ***AtkinsRéalis***' business;
  - Pretends to be another individual or business entity.

- Copy, take or destroy ***AtkinsRéalis' intellectual property*** without authorisation, during or after our relationship with ***AtkinsRéalis***; or
- Access or encourage access to inappropriate or unauthorised ***confidential information.***

For more information

Consult our procedure on Acceptable Use of Technologies.

Consult our procedure on Information Technologies Management.

Consult our Data Compliance page on our intranet.

Consult our work instruction on Information Classification.

Consult our work instruction on Information Handling Requirements.

Consult our work instruction on Global Data Retention Schedule.

Consult our work instruction on Artificial Intelligence.

Consult our scenario about keeping data safe.

7.4. Protecting the company when communicating

We must always:

- Keep in mind that the views we express are our own and not those of our ***company***;
- Be cautious when posting and responding on ***social media*** as we can be identified as ***AtkinsRéalis employees*** even if our user profile doesn't indicate that we are;
- Remember that our actions reflect on ***AtkinsRéalis*** when we identify ourselves on ***social media*** as ***company employees***. This means that our posts could affect ***AtkinsRéalis***' reputation and business interests;
- Direct all media inquiries to the Global External Communications team (media@atkinsrealis.com) or Regional Communications and Marketing Business Partner, as only designated spokespersons may speak ***on behalf of*** the ***company***;
- Make sure that our comments remain strictly personal when sharing opinions on matters not related to ***AtkinsRéalis***;
- Obtain our ***manager's*** approval in line with External Communications ***policy*** requirements before acting as keynote speakers or panellists;
- Ensure that any sustainability-related statements or claims made publicly—whether in presentations, reports, or public communications—are accurate, supported by verifiable ***data***, and do not create a misleading impression (greenwashing risk); and
- Report suspicious activity, such as suspicious communications.

We must never:

- Speak to the media ***on behalf of AtkinsRéalis*** unless officially designated as a spokesperson;
- Commit or otherwise involve ***AtkinsRéalis*** without authorisation;
- Misrepresent ***AtkinsRéalis***; or
- Use any ***personal data*** in public posts unless we have explicit permission from the individual or the ***personal data*** has already been made public, either through official communications or by the individual themselves

For more information

Consult our policy on External Communications.

Consult our procedure on Social Media.

8

Reporting suspected misconduct and concerns

8.1. Duty to report

We must ensure that we live by our values and our ***Code***. This is why we all have an important duty to report in good faith:

- Any known or suspected violation of our ***Code*** or any other ***governance documents***;
- Any suspected violation of applicable laws, rules or regulations;
- Any observed instances of misconduct; and
- Any observed pressure to compromise our ethical standards.

When we are in one of these situations, we must promptly report it via any of the following resources:

- Our ***manager*** or their ***manager***;
- Our Integrity Officer;
- Our relevant representative from a ***corporate function*** (such as Human Resources, Legal Affairs, Finance, etc.); or
- The Reporting Line (operated by a secured third-party provider which allows us to remain anonymous if we wish).

We must always:

- Promptly disclose to Integrity or Legal Affairs any formal legal notices (such as subpoenas or court orders) we may receive in relation with ***AtkinsRéalis***' activities.

For more information

Consult our procedure on Compliance.

Watch our video about speaking up.

8.2. Non-retaliation

AtkinsRéalis is committed to creating an environment where everyone feels comfortable to report any of the situations as described in Section 8.1. We are free to remain anonymous when we do so.

We must never retaliate against someone who, in good faith, reports any of these situations.

We will always be protected against ***retaliation*** when we come forward with our concerns. If we believe we have been treated unfairly because we have reported a concern, we must report it as we would report any other violation.

For more information

Consult our procedure on Compliance.

8.3. Internal investigations

AtkinsRéalis takes all cases of reporting seriously and assumes that they are all legitimate and done in good faith. Investigations into allegations of potential misconduct are mainly performed by Integrity Investigations, Global Security, Cyber Security, Human Resources and Global Health, Safety and Environment. Subject matter experts such as Internal Audit and Project Performance and Risk Oversight may participate from time to time. We use recognized investigation techniques in accordance with our internal practices and protocols to ensure that the quality and integrity of the investigation process are maintained.

Investigations are conducted with respect and discretion. They are kept confidential to the extent permitted by law. ***AtkinsRéalis*** may be required to report criminal or improper activity to the appropriate government, law enforcement or regulatory authorities. We are all considered innocent until facts uncovered during the investigation point to the contrary.

We must always:

Keep our interactions with the investigative teams confidential when required to do so by the ***company***; and

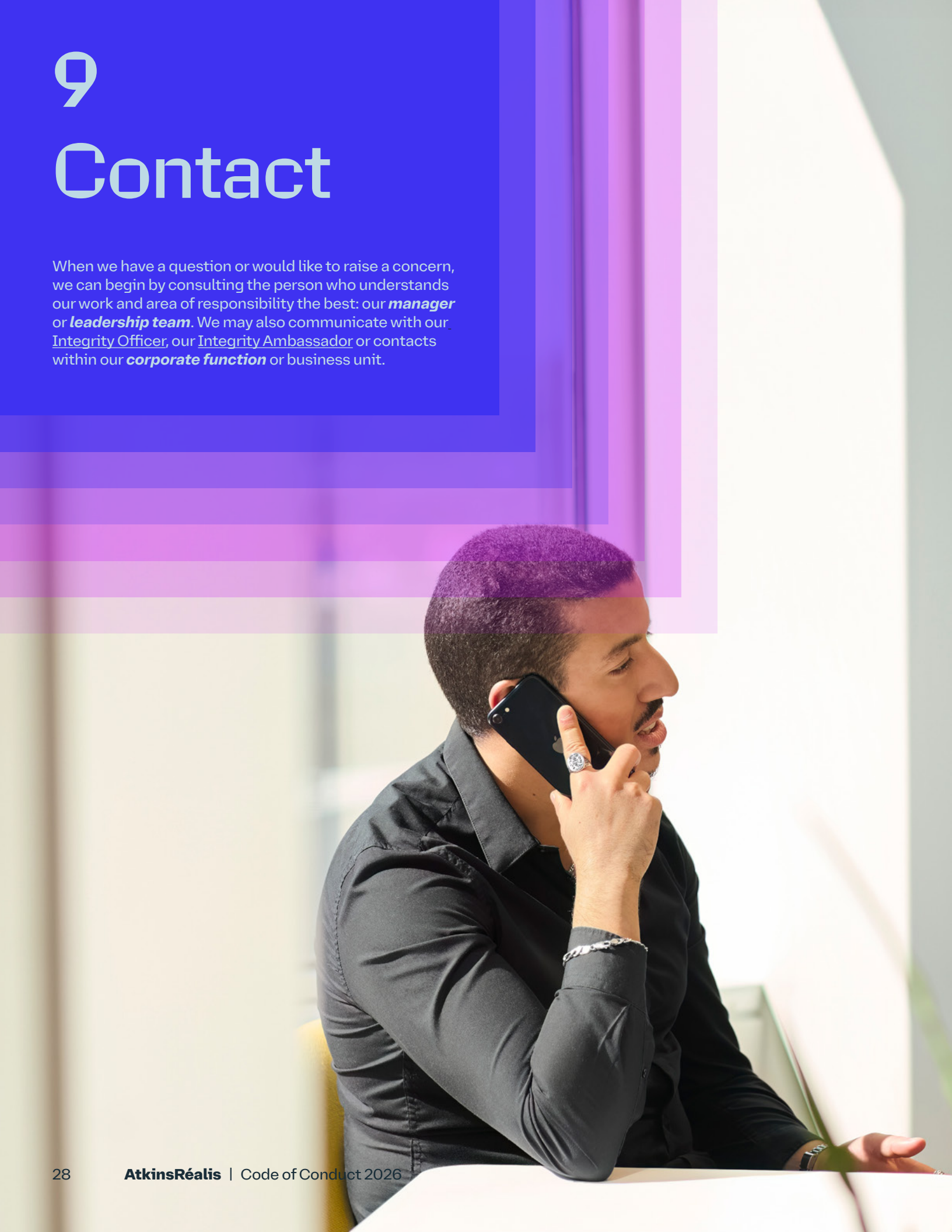
- Fully, truthfully and transparently cooperate with the investigative teams by participating in interviews and by providing all requested documents and information.

We must never:

- Obstruct or delay any internal investigation.

9 Contact

When we have a question or would like to raise a concern, we can begin by consulting the person who understands our work and area of responsibility the best: our ***manager*** or ***leadership team***. We may also communicate with our Integrity Officer, our Integrity Ambassador or contacts within our ***corporate function*** or business unit.



Glossary

Actual Conflict of Interest

refers to a real and existing conflict of interest.

Alcohol

refers to any substance that may be consumed and that has an alcoholic content in excess of 0.5 percent by volume.

Artificial Intelligence (AI)

refers to the ability of machines to imitate and perform tasks that have historically required human problem solving. It's a mixture of computer science, mathematics and statistics that focuses on creating intelligent systems capable of simulating learning, reasoning, and making decisions. AI enables machines to analyze and interpret data, recognize patterns, solve problems, and interact with humans.

AtkinsRéalis

refers to AtkinsRéalis Group Inc. and all entities, joint ventures, partnerships or other undertakings under its direct or indirect control.

Bank Account

refers to an account with a bank or financial institution.

Benefit

refers to anything of value, whether tangible or intangible, offered or conveyed by a person to another person or that other person's relatives. Includes all manner of gifts and marks of hospitality. Without limiting the generality of the foregoing, examples of benefits may include goods and merchandise, meals (including beverages), travel, lodging and entertainment/events (tickets to concerts or sporting events, access to VIP lounges, etc.).

Board of Directors

refers to the board of directors of AtkinsRéalis Group Inc.

Bonded Labour

refers to situations where someone pledges their personal services or those of a person under their control as security for a debt and either the value of the services is not applied towards the liquidation of the debt, or the length and nature of the services are not respectively limited and defined.

Bribery

refers to the offering, giving, receiving, or soliciting of any item of value to influence the actions of an official, or other person, in charge of a public or legal duty.

Business Partner

refers to a third party with whom AtkinsRéalis enters into a business relationship during which the third party represents AtkinsRéalis or acts on its behalf whilst interacting with other parties.

Child Labour

refers to work that deprives children of their childhood, their potential and their dignity, and that is harmful to physical and mental development, such as work that:

- Is mentally, physically, socially or morally dangerous and harmful to children; and/or
- Interferes with their schooling by: depriving them of the opportunity to attend school; obliging them to leave school prematurely; or requiring them to attempt to combine school attendance with excessively long and heavy work.

Client

refers to either the party with whom AtkinsRéalis has signed a contract or a prime contract for the provision to that party of goods, works or services, or the ultimate beneficiaries of such goods, works or services, or both/all of them, as the context may require.

Close Personal Relationship

refers to a relationship with someone other than an immediate family member, which is significant enough that it affects a person's ability to be objective and unbiased and act in the best interest of AtkinsRéalis.

Code of Conduct or Code

refers to AtkinsRéalis' Code of Conduct in its current version.

Commitment

see Statement.

Company

see AtkinsRéalis.

Company securities

means, as the context may be, shares, options, notes and any other securities that the company may issue from time to time (such as bonds, convertible securities and shares acquired through an ESOP) and includes, any instrument, agreement or security whose value, market price or payment obligations are based on the value, market price or payment obligations of a security of the company (including with respect to the company's long-term incentive plans, such as deferred share units, restricted share units and performance share units), and any other instrument, agreement or understanding that affects, directly or indirectly, a person's economic interest in a security of the company.

Competitor

refers to a third party that offers, or is capable of offering, the same or similar products and services to some or all of those offered by AtkinsRéalis, in markets served or intended to be served by AtkinsRéalis.

Confidential Information

refers to information that if lost, exposed or corrupted, could have adverse effects for AtkinsRéalis, our clients or other third parties. Loss of confidential information could result in fines and prosecution. Most of the information handled within AtkinsRéalis is considered to be confidential.

Confidential information includes, for example:

- Data marked using AtkinsRéalis' internal information classification system;
- Personal data (e.g., health records);
- Intellectual property (client or AtkinsRéalis owned);
- Information that could cause hazards to AtkinsRéalis personnel's safety if compromised;
- Information marked using a government or nuclear-regulated approach;
- Commercially sensitive project information such as framework rates;
- Strategic planning;
- Mergers & acquisitions information;
- Information related to a bid during the bidding process;
- Passwords, certificates or any documents that could be used to gain access to AtkinsRéalis information technology equipment or information; and
- Non-sensitive internal emails and chats.

Conflict of Interest (COI)

refers to a set of circumstances which creates an actual, potential or perceived risk that the professional judgment or actions in relation to the stakeholder's duties and obligations toward the company will be unduly influenced by a secondary interest, which usually benefits the stakeholder financially, professionally and/or personally.

Consultant

see Individual Consultant.

Corporate Function

refers to the corporate functional departments of Human Resources, Finance, Legal Affairs, Risk and Project Oversight, the Office of the Chief Operating Officer and the Office of the Chief Growth Officer.

Corruption

refers to the abuse of entrusted power for private gain.

Counterparty

refers to any third party that partners with, supplies goods and/or services to, carries out work for, acts on behalf of, or represents AtkinsRéalis. That includes business partners, suppliers, manufacturers, distributors, service providers and contractors/subcontractors. That also includes their principals, owners, shareholders, or any other controlling person or entity, any entity under common ownership and anyone working for them or acting on their behalf (including their employees, consultants, representatives and anyone in their supply chain), whenever they are involved in AtkinsRéalis business or related activities.

Data

refers to a collection of facts, such as numbers, words, measurements, observations or just descriptions that can be used for reference or analysis. Data is not just used to analyze what has already happened, but it can be used to inform decisions and help us understand what may happen in the future.

Data Governance

refers to the exercise of authority and control, and shared decision-making (planning, monitoring and enforcement) over the management of all global data assets.

Data Governance and Compliance Framework

refers to the Data Governance Policy, the Data Privacy Compliance Policy and all associated governance documents that govern and advise on the operational, legal, contractual and regulatory data requirements applicable across AtkinsRéalis.

Data Lifecycle

refers to the processes that create or obtain data, those that move, transform, or store it, those that enable it to be maintained or shared, those that apply it, and those that destroy it. Like other assets, data has a lifecycle. Throughout its lifecycle, data may be cleansed, transformed, merged, enhanced or aggregated. Data is rarely static and managing it involves a set of interconnected processes all closely aligned with our data lifecycle.

Data Protection and Privacy Law

refers to the national or territorial data protection and data privacy legislation implemented in the countries in which AtkinsRéalis operates. For example, the EU General Data Protection Regulation and the Privacy and Electronic Communications Regulation are the applicable data protection and data privacy law in the European Union and apply to all processing of personal data concerning those living in that jurisdiction. The Personal Information Protection and Electronic Documents Act is one of the applicable data protection and privacy laws in Canada.

Deviation

refers to any action or absence of action that is different from what is required by an established governance document.

Discrimination

refers to situations where an individual, or group of individuals, is treated differently, or negatively, on account of their traits (e.g., their beliefs, national or ethnic origin, culture, religion, political convictions, age, mental or physical disability, sex, sexual orientation, gender identity, partnership status, pregnancy, maternity, or any other grounds prohibited by applicable law).

Donation

refers to any support, whether financial or in-kind, typically to a charity or other philanthropic or not-for-profit organization, for the purpose of benefiting a cause or a community, for no consideration other than public recognition, where applicable. In most jurisdictions, a tax receipt will be issued for donations.

Drug

refers to any substance, chemical or agent for which the use or possession is unlawful or requires a personal prescription or authorization from a licensed treating physician, or for which the use or possession is regulated by legislation such as cannabis, or any other psychoactive substance, and any non-prescription medication lawfully sold, and drug paraphernalia.

Economic Sanctions

refers to laws and regulations which prohibit or restrict business dealings with certain countries and their nationals, and/or with designated entities or persons.

Employee

refers to an individual having an employment relationship with AtkinsRéalis, irrespective of their employment status (i.e.: regular, casual, contractual, seasonal status or craft labour) and working on a full- or part-time basis.

Executive Committee

refers to a committee established by management comprised of the President and CEO and other senior officers.

Expense Report

refers to a report filed by an employee based upon the appropriate form provided through the finance system in order to claim reimbursement of their expenses.

Export

refers to:

- physically or electronically sending an item across an international boundary;
- providing a service to a recipient in another country (such as engineering services for a project abroad); or
- in some jurisdictions, disclosing information to a person of foreign nationality, regardless of his or her location (deemed export).

Export Controls

refers to laws and regulations that regulate and/or restrict the export of items and the transfer of items to foreign nations (and/or from one foreign nation to another) and/or foreign nationals or companies for reasons of national security, foreign policy, anti-terrorism or non-proliferation.

External Auditor

refers to an auditor that is appointed by AtkinsRéalis' shareholders on an annual basis, as described in AtkinsRéalis' notice of annual and special meeting of shareholders. The current auditor of AtkinsRéalis is Deloitte LLP. Deloitte LLP also means Deloitte Touche Tohmatsu Limited, including related member firms and affiliates.

Facilitation Payments

refers to unofficial payments (as opposed to legitimate and official fees or taxes) made for the purpose of obtaining, securing or accelerating the making of a decision or performance of a service or routine action to which the person or company paying is already entitled. Facilitation payments are typically small payments made in cash, or small gifts, to an individual with little decision-making power, yet capable of controlling a process (holding up, obstructing or drawing out the process). They tend to be made secretly and are often, but not exclusively, requested in the following situations:

- Obtaining issuance of licences or permits;
- Clearing customs, immigration or border security; or
- Processing governmental papers, such as visas and other official documents.

Forced Labour

refers to any work or service which people are forced to do against their will and under threat.

Former Government Official

refers to someone who was a government official at any time in the last five years.

Fraud

refers to an action taken with the intention to deceive such as falsification, concealment, or lying, in order to obtain an advantage or evade responsibilities, for one's own benefit or that of someone else.

Gifts and Hospitality

see Benefit.

Governance Document

refers to AtkinsRéalis' values, statements, commitments, Code of Conduct, Counterparty Code of Conduct, policies, procedures, standards, work instructions, guidelines, and any other documents (processes, workflows, checklists, templates, etc.) which set out mandatory rules within the company.

Governance Owner

refers to the person in charge of a corporate function who reports directly to the President and Chief Executive Officer or a person who reports directly to the Board of Directors, and who has the authority to issue governance documents with respect to their specific scope of responsibility.

Government Official

refers to an officer or employee of or any person (such as an attorney or legal representative) representing or acting on behalf of:

- Any level of government (whether federal, provincial, state, municipal or other);
- Political parties, party officials and candidates for public office;
- State-owned and controlled entities;
- Public international or intergovernmental organizations; or
- A person who holds a legislative, administrative, judicial or military position.

Guidelines

refers to a governance document that provides general information and guidance about a specific task or subject.

Harassment

refers to situations where behaviour, be it sexual, psychological or in any other form, towards another person is shocking or offensive, affects the person's dignity, well-being, physical or psychological safety, or results in a harmful work environment.

Harassment results in an intimidating, hostile, degrading, humiliating or offensive working environment for the person and can come in the form of repeated, hostile or unwanted conduct, verbal comments, actions or gestures, or can take the form of a single serious incident. Harassment can involve words or actions that are known or should be known to be offensive, embarrassing, humiliating, demeaning, or unwelcome. This includes bullying.

Human Rights

refers to rights as defined by the Universal Declaration of Human Rights and adopted on December 10, 1948.

Human Trafficking

refers to the recruitment, transportation, transfer, harbouring, or receipt of persons by improper means (such as force, abduction, fraud, or coercion) for an improper purpose.

Immediate Family

refers to an individual's spouse (or significant other), child, parent, sibling.

Individual Consultant

refers to an individual whose services are contracted, directly with that individual or through an entity, for a specific project or mandate and who is not on AtkinsRéalis payroll.

Information Technology Equipment

refers to any technologies and technological components, including but not limited to systems, infrastructure, equipment, computer software, services and processes, that support and manage AtkinsRéalis data and the people working with these technologies.

- Equipment: workstations, notebooks, smart devices, computer software as well as their peripheral components (e.g., printers and other accessories).
- Infrastructure: telecommunications networks, servers, as well as their configurations, etc.
- Services: email, internet, as well as the execution and scheduling of batch jobs.

Intellectual Property

refers to all patents, rights to inventions, utility models, copyright and related rights, trademarks, service marks, trade, business and domain names, rights in trade dress, rights in get-up, rights in goodwill, rights to sue for passing off, unfair competition rights, rights in designs, rights in computer software, database rights, topography rights, moral rights, image rights, and all other intellectual property rights, in each case whether registered or unregistered and including all applications and rights to apply for and be granted, renewals or extensions of, and rights to claim priority from, such rights and all similar or equivalent rights or forms of protection which subsist or will subsist now or in the future in any part of the world.

Invoice

refers to a document outlining the amount owed by one party to another in consideration of products provided and/or services performed. It represents a formal request for payment by the provider of such products or services.

Joint Venture

refers to any form of association between AtkinsRéalis and one or more third parties other than in a prime-sub capacity, whereby a common business activity is pursued or whereby the parties' resources are combined to achieve a common goal. Without limiting the generality of the foregoing, such an association can take the form of an incorporated or non-incorporated (contractual) entity, which may or may not carry registration or licensing requirements. Such an association can also take place at any stage of the project cycle, whether preliminary intent to jointly consider an opportunity, teaming on the pursuit thereof or as a means of project execution.

Leadership Team

refers to members of the company's senior management team who are direct reports of the President and Chief Executive Officer.

Liability

refers to a present obligation of the entity arising from past events, the settlement of which is expected to result in an outflow from the entity of resources embodying economic benefits.

Loaned Personnel

refers to a resource employed and paid by a third-party employer whose services are loaned to AtkinsRéalis for a defined period of time and mandate.

Lobbying

refers to the process of attempting to influence, or advising those who wish to influence, public and government policy at all levels: federal, state, regional and local. It involves the advocacy of an interest that is affected, actually or potentially, by the decisions of legislators or government leaders. Lobbying activities can be exercised by in-house lobbyists and/or consultant lobbyists.

Manager

refers to an employee's direct functional supervisor. In the case of a candidate, "manager" refers to the functional manager to whom the candidate will report.

Modern Slavery

refers to common forms of exploitation including human trafficking, domestic servitude, forced marriage, forced criminality, forced labour, bonded labour, child labour and sexual exploitation.

Money Laundering

refers to the process by which a person conceals or disguises the identity or the origin of illegally obtained funds so that they appear to have originated from legitimate sources.

Officer

refers to the chairperson of the board of directors, the president, a vice-president, the secretary, the treasurer, the controller, the general counsel, the general manager and a managing director of an AtkinsRéalis-related entity, or any other individual who performs functions for an entity similar to those normally performed by an individual occupying any of these offices.

On Behalf of

means, in the context of an action taken or any interaction with third parties such as clients, subcontractors, vendors, other contractors, public bodies, government officials, governmental authorities or regulatory agencies, that the action or interaction is, or may reasonably be perceived to be, in the name or for the benefit of, or may otherwise be imputed to, AtkinsRéalis.

Peer Review

refers to an independent objective assessment of the health of a project using peer-to-peer expertise across multiple disciplines (such as scheduling, risk and opportunity management, financial management and commercial management) and assess compliance with applicable governance documents, providing recommendations and actions back to the project manager.

Perceived Conflict of Interest

refers to a set of circumstances which an observer may reasonably view or perceive as giving rise to a conflict of interest (actual or potential), while in reality it does not.

Personal Data

refers to any information directly or indirectly relating to an identified or identifiable individual. Examples of personal data include information about an individual's name, address or their performance at work, etc.

Personal Data Processing

refers to collecting, recording or storing personal data or carrying out any operation or set of operations on the data including retrieving, viewing, organizing, adapting, altering, using, disclosing, transmitting, disseminating, erasing or destroying the information. However, processing can also be simply characterized as using personal data for any purpose, including merely storing personal data.

Policy

refers to governance document that provides guiding principles and rules with high relevance for the whole organization. Policies are issued by top management to support organizational values and principles. They require approval from the Executive Committee.

Political Contribution

refers to any contribution, whether monetary, non-monetary or in-kind, made to a candidate for public office, or to a political party, organization or entity. Political contributions include without limitation: direct financial contributions (subscriptions, loans, advances, deposits, etc.), admission fees to fundraising activities (dinners, golf tournaments, etc.) sponsored by or for political parties or candidates, political campaign expenses, goods, services, equipment, facilities, etc.

Potential Conflict of Interest

refers to a situation where there is a reasonable possibility of a conflict of interest arising in the future.

Procedure

refers to a governance document that provides rules and requirements on a specific subject to ensure uniformity and control in the performance of tasks and processes within the organization.

Project

refers to a temporary endeavour designed to produce a unique product, service or result undertaken to meet unique goals and objectives, typically to bring about beneficial changes or added value.

Psychological Safety

refers to a belief that one will not be punished or humiliated for speaking up with ideas, questions, concerns, or mistakes and that the team is safe for interpersonal risk taking.

Retaliation

refers to punishing someone for reporting, in good faith, an allegation or concern. Retaliation can include any negative job action such as demotion, unjustified discipline, firing, salary reduction or job or shift reassignment, and can be performed directly or indirectly.

Secondary Employment

refers to other employment or directorships outside of AtkinsRéalis, including any personal business we may be conducting whether or not related to AtkinsRéalis' business.

Significant Financial Interest

refers to owning any interest equal or greater to 5% in any company or entity which does, or seeks to do, business with or is a competitor of AtkinsRéalis.

Social Media

refers to a computer-based technology that facilitates the sharing of ideas, thoughts, and information through the building of virtual networks and communities. By design, social media is Internet-based and gives users quick electronic communication of content.

Social media includes all personal digital presence and more specifically:

- Personal blogs and websites;
- Social networking sites (Facebook, Tik Tok);
- Professional networking sites (LinkedIn);
- Micro-blogs (X);
- Discussion/chat forums whether political, non-political, or other;
- Content sharing sites (YouTube); and
- Content aggregation and social bookmarking sites (Alltop.com, Reddit, Digg).

Sponsorship

refers to a business agreement whereby AtkinsRéalis makes a contribution to an organization in exchange for negotiated entitlements. The entitlements often take the form of publicity, brand visibility, an elevated profile for employees or other agreed conditions. Due to these terms, no tax receipt should be expected, even if the organization is a registered charity. Sponsorships are a business development transaction and are not paid out of the budgeted amount that AtkinsRéalis dedicates to donations.

Stakeholder

refers to a person or organization that can affect, be affected by, or perceive itself to be affected by, a decision or activity (such as employees, clients, suppliers, communities, regulators, not for profit organizations, investors, shareholders, etc.).

Standard

refers to a governance document that provides rules and mandatory requirements, applicable across the whole organization, related to the management of AtkinsRéalis projects for external clients, ensuring uniformity and control in the performance of project management-related tasks and processes.

Statement

refers to a governance document that provides the intentions and direction of the organization related to its performance as formally expressed by top management.

Supplier

refers to any third party that supplies goods and/or services, including manufacturers, fabricators, distributors and vendors.

System

refers to AtkinsRéalis' network and enterprise applications as well as any process or methods used to produce a result.

Tax

refers to all forms of tax, including but not limited to, payroll and employment taxes, national insurance and social security contribution, capital taxes, corporation tax, customs and duties, Value Added Tax (VAT) or other indirect sales and goods taxes irrespective of territory.

Tax Evasion

refers to the unlawful evasion of taxes performed by misrepresenting the taxpayer's affairs with the goal to reduce or eliminate their tax liability. It may take the form of dishonest tax reporting through the understatement of income or gains or the overstatement of deductions or losses. It includes the facilitation of tax evasion which refers to the deliberate and dishonest action (or omission) to assist another person to evade taxes in any jurisdiction. Tax evasion can be realized by individuals, corporations or trusts.

Third Party

refers to any individual or organization, other than AtkinsRéalis, that personnel may come into contact with within the course of their work and business activities, including but not limited to, business partners (including consortium and joint venture partners), family members, candidates, competitors, clients, suppliers and government officials.

Transaction

refers to the sale of services (such as engineering, procurement, construction, construction management, financing and operations & maintenance), products, parts or equipment, shipment, transfer of information or transfer of funds. Transaction also refers to any purchases, expenses, payments and lease agreements.

Violence

refers to the use of physical force that causes or could possibly cause physical injury, or any action(s), behaviour or statement(s) that could reasonably be perceived as a threat to one's safety or security.

Work Instruction

refers to a governance document that provides detailed instructions (the set of actions and steps) describing how to perform a specific task.

Workplace

refers to any place over which AtkinsRéalis exerts administrative responsibility and any land, premises, location or thing at, upon, in or near which an employee works or attends by reason of or in the course of employment.

Engineering a better future for our planet and its people

We're committed to lead our clients, and partners across the infrastructure ecosystem, to engineer this better future for our planet and its people.

atkinsrealis.com

AtkinsRéalis

AtkinsRéalis

Additional information and various documents related to integrity are available on our website.

atkinsrealis.com