



## KTS Code of Ethics Policy

### 1. PREAMBLE

- 1.1 KTS **Code of Ethics** sets out the basis of KTS relationship with customers, suppliers, staff and the law. It is derived from the Group's operating values and practices and the KTS Spirit.

The KTS Spirit's main elements are:

- a) Two-way loyalty of staff to management and management to staff.
  - b) Commitment to quality service and a willingness to go the extra mile.
  - c) Valuing of people: demonstrating care for the interests of customers and all who do work for KTS.
  - d) Building enduring relationships with customers and suppliers through long-term commitments and face-to-face contacts.
  - e) Honesty in communication with customers and all who do work for KTS.
  - f) Compliance with all relevant laws, regulations and internal KTS policies.
- 1.2 This Code of Ethics reflects these values and acts to preserve them. The Code addresses:
- a) Global corporate ethics
  - b) KTS customers
  - c) KTS staff, subcontractors, consultants and suppliers
  - d) Community and environment

### 2. GLOBAL CORPORATE ETHICS

- 2.1 KTS respects and abides by the laws of the countries in which it operates and all relevant supranational laws and regulations. Further, KTS people conduct their business in full understanding of, and in compliance with, KTS policies including those covering corruption, bribery, money laundering, whistle blowing and trade sanctions.
- 2.2 KTS respects the rights and cultural practices of people in the countries in which it operates.
- 2.3 KTS provides a work environment free of discrimination and harassment based on age, ancestry, colour, marital status, medical condition, mental disability, physical disability (including persons infected with the HIV virus or persons with AIDS), national origin, race, religion, sex, sexual orientation or veteran status.

### 3. KTS CUSTOMERS

- 3.1 KTS' customers can expect KTS employees to do all within their power to meet their needs and exceed their expectations.
- 3.2 KTS' customers can expect all KTS employees to deal honestly with them and not commit any crime at their behest.
- 3.3 KTS's customers can expect KTS employees to work to create enduring and positive relationships with them.



#### **4. KTS Employees, Suppliers, Subcontractors and Consultants**

- 4.1 People who undertake work for KTS do so cooperatively in a spirit of trust built on honest communication, professional conduct, fairness in business dealings and in full compliance with all laws and regulations.
- 4.2 KTS values highly the cultural diversity of all who undertake work for KTS and nurtures their willingness and capacity to work together to achieve common goals.
- 4.3 KTS employees ensure that workplace health and safety standards and practices are given priority and extend to all who undertake work for KTS.
- 4.4 KTS managers support the honest efforts of all staff to improve themselves and make provision for training and professional development to ensure staff are appropriately equipped for the jobs they are required to do on behalf of customers.
- 4.5 KTS managers recognize that all who undertake work for KTS is connected to families and that the well-being of the family has an impact on their ability to work effectively.
- 4.6 KTS employees will neither attempt to use their standing as employees of KTS to derive a private business advantage for themselves, any associate or family member nor engage in any other activity which constitutes a conflict of interest between their private and professional roles.

#### **5. COMMUNITY AND ENVIRONMENT**

- 5.1 KTS managers are committed to creating a healthy and safe work environment for all who undertake work for KTS.
- 5.2 KTS companies are committed over the long term to creating a more sustainable environment through the development of effective recycling and waste management policies and practices.
- 5.3 KTS employees recognize the importance of contributing to the well-being and development of the communities in which they work.
- 5.4 KTS is committed to causing no harm to the environment.