



CODE OF ETHICS AND CONDUCT



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Signed on behalf of the Board	Board Chairman
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Dear Colleagues,

TCTA is committed to being a responsible corporate citizen and employer.

The TCTA Code of Ethics and Conduct explicitly defines the behaviour ('the way we do things') expected from employees in their interactions with colleagues and stakeholders. This is crucial to embody the organisation's role as a responsible corporate citizen as we deliver on our mandate.

The way we do things at TCTA is underpinned by the TCTA **Values**, namely **Respect, Integrity, Unity, Growth, and Excellence**.

As our business evolves and the operating landscape becomes more complex and ambiguous than ever before, there are times when the right choice is neither simple nor apparent. Yet, with a clear understanding of our value-based behaviour, as well as legal and regulatory requirements, policies, and procedures, our decision-making is well guided. These are elaborated upon in this Code of Ethics and Conduct.

All TCTA employees must comply with the provisions of this Code. If you have questions or concerns about what professional business and ethical conduct is appropriate, I urge you to discuss it with your Line Manager or with our Compliance and Ethics Office. Alternatively, you may reach out anonymously through the Ethics Hotline.

Please read this Code with care. A steadfast commitment to its principles guides us in being **Courageous**, taking **Accountability** and building **Trust** among ourselves and with our key stakeholders.

Thank you for safeguarding the trust others have placed in us by living our values and making the right decisions.

Percy Sechemane
Chief Executive Officer

Precious Sibiya
Board Chairman

Our Pledge as Employees

We pledge our commitment to the **Vision** of the Trans-Caledon Tunnel Authority: **to be a world-class enabler of sustainable infrastructure for a water-secure South Africa**. We recognise our key role in delivering against the **Mission: to plan, finance, and implement sustainable and accessible water resource infrastructure**.

We pledge to always act in the best interests of our organisation, country, and stakeholders. We commit to listening, understanding, and maintaining discipline in our work and its delivery. We aim for mutual consensus in internal and external relationships. We promise to behave and act with **Respect, Integrity, Excellence, Unity, and a Growth mindset**. This approach will be our lodestar as we perform our tasks for the organisation and interact with people from diverse cultural backgrounds.

RESPECT	INTEGRITY	EXCELLENCE	UNITY	GROWTH
We acknowledge and embrace diversity, and we are responsible for one another's needs and those of our communities, stakeholders, and the environment.	We conduct ourselves honestly and transparently, stimulating constructive action, truly 'walk the talk', and gaining trust and credibility through fairness and mutually cooperative relationships.	We consistently give our best, deliver excellent work with agility, and think innovatively and creatively to improve our performance.	We are committed through a common vision and goals, effective teamwork, and partnership, and we contribute positively to the team's performance, spirit, and morale.	We willingly share knowledge and information, we are innovative and proactive in thought and action, and we encourage and provide opportunities for individual and collective growth.

We pledge to act professionally and ethically by adhering to the highest standards of conduct, even when no one is watching. We commit to being **Accountable** by accepting responsibility for our work and actions. We will be **Courageous** when things are difficult, and act in a manner that builds **Trust** with those we interact with.

TCTA - A new word for water.



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1. PURPOSE AND SCOPE

TCTA is committed to being a responsible corporate citizen and employer.

The TCTA Code of Ethics and Conduct explicitly defines the behaviour ('the way we do things') expected from TCTA employees in their interactions with colleagues and stakeholders. This embodies our role as a responsible corporate organisation and employer as we deliver on our mandate.

This policy position applies to all TCTA employees and TCTA non-executive directors.

2. POLICY STATEMENT

As TCTA's business and the operating landscape evolve, determining the appropriate behaviour and decisions has become more complex. A clear grasp of value-based behaviour, combined with an understanding of legal and regulatory requirements and TCTA's policies and procedures, guides professional and ethical conduct in decision-making. This steadfast commitment to the principles in this Code directs the organisation and its employees towards being **Courageous**, taking **Accountability** and building **Trust** among themselves and with key stakeholders. In line with this, TCTA maintains a zero-tolerance approach to unprofessional and unethical conduct.

3. PRINCIPLES OF PROFESSIONAL BUSINESS AND ETHICAL CONDUCT

The way we do things at TCTA is underpinned by the TCTA **Values**, namely **Respect, Integrity, Unity, Growth, and Excellence**.

3.1. RESPECT

We acknowledge and embrace diversity and are responsive to one another's needs and those of our communities, stakeholders, and the environment.

3.1.1. Human Rights

TCTA respects and advances **Human Rights**. It recognises its responsibility to respect and value human rights as underpinned by fairness and inclusion.

TCTA employees are expected to treat each other and other people justly and fairly. The duty to treat others justly and fairly is particularly relevant where the consequences of our decisions may be material to our stakeholders or may not align with their expectations.

TCTA employees must uphold human rights throughout TCTA operations and relationships. In everything employees do in their capacity as TCTA representatives, they must strive to treat others the way they would like to be treated.

All directors and employees, when **engaging in any activity**, must use language and behave in such a way that is not likely to be experienced or perceived by another party as disrespectful or undignified. TCTA employees are to refrain from unfair discrimination, abusive and offensive language, and threatening behaviour.

All employees of TCTA must treat every individual with respect and dignity, irrespective of their position or the significance of their interest in the organisation, or its business interest in them.

3.1.2. **Workplace Conditions**

TCTA is committed to respecting human rights by providing a **decent and stable workplace** that upholds non-discrimination and respects diversity and freedom of association. We also champion the right to collective bargaining in good faith, the right to a safe and healthy working environment, and ensure fair and competitive remuneration and benefits.

TCTA provides **fair working conditions, remuneration, and benefits** (i.e., working conditions, remuneration, and benefits that are fair, competitive, and in compliance with labour legislation).

While entrenching a high-performance culture, TCTA respects every individual's basic human rights, including the one to be treated with respect and dignity. Work-life balance is important to TCTA. Employees are given suitable opportunities to improve their skills and advance in their careers.

TCTA provides **equal opportunities and does not discriminate unfairly**. It values its employees and recognises the critical contribution they make to its success. The organisation is committed to ensuring equal opportunity and eradicating discriminatory practices.

TCTA has zero tolerance for unfair discrimination. We expect our employees to refrain from discriminating based on race, colour, religion, gender, age, language, culture, nationality, ethnic or social origin, trade union affiliation, political opinion, sexual orientation, or health status.

Management must administer employee policies, programmes, and practices in a non-discriminatory manner. This includes all aspects of the employment relationship such as recruitment, hiring, work allocation, discipline, promotion, termination, wage and salary administration, and training and development.

TCTA designs and implements appropriate systems, processes, and measures to ensure the security of its workplaces. It enforces these measures to safeguard its staff and business

interests. The aim is to avert security breaches and to respond adeptly when such incidents arise, all while upholding declared human rights.

3.1.3. **Substance Abuse**

Alcohol, drug, or other **substance abuse** impairs people's ability to perform properly and can have serious adverse effects on their security, safety, efficiency, and productivity. It also impacts the security, safety, and efficiency of those around them. Misusing prescription drugs, or using, possessing, distributing, or selling illicit substances on TCTA premises is prohibited.

TCTA prohibits individuals under the influence of prescription or non-prescription drugs, alcohol, or other controlled substances from working on its premises. This prohibition also applies to remote work conducted through the Teams Platform or any other platform. TCTA reserves the right to test, with their consent, any individual believed to be under the influence before granting them access to its premises or sites. If intoxication is detected, TCTA has the right to refuse access.

TCTA does not tolerate any form of **abusive behaviour or harassment** in the workplace or any work-related environment, toward or among employees, service providers, or others. Abusive behaviour and harassment destroy a positive work environment and will not be tolerated.

3.1.4. **Personal Information**

TCTA is committed to protecting the confidentiality of its internal **and external stakeholders' personal information** and adhering to the provisions of the legislation and strict standards when processing such information.

TCTA must only collect and retain personal employee data required for the efficient operation of the business or mandated by law, using only lawful methods.

TCTA must securely and confidentially store personal information, granting access only to those with a legitimate need and as permitted by law.

All personal data collected and held by TCTA must be stored and processed fairly, transparently, carefully and in compliance with applicable data privacy laws.

All those employees with access to personal employee records must adhere to the highest standards of confidentiality when handling the data. Outside disclosure of employee personal information must only be done on presentation of a court order or with the written consent of the employee/s concerned.

TCTA prohibits forced and child labour. The organisation respects the rights of local communities and protects the environment.

TCTA respects the **rights, customs, and cultures of societies and local communities**. It recognises that its decisions and activities may impact the surrounding communities of its projects. TCTA is committed to being responsive to community concerns and will take steps to minimise impacts on communities.

Employees of the organisation must strive to work collaboratively and transparently with local communities, adhering to the principle of free, prior, and informed consent.

TCTA strives to avoid involuntary resettlement through project design. When resettlement is unavoidable, employees must follow the guidelines and processes provided for by the legislative framework applicable.

The organisation acknowledges and respects the wide diversity of customs, traditions, and values that exist among the indigenous communities and cultures in the provinces or regions in which it operates. Its employees must engage with indigenous communities in a manner that is respectful of their cultures and customs. They must look for an appropriate balance between respecting cultural heritage and community expectations for economic development.

3.2. INTEGRITY

Employees should conduct themselves honestly and transparently, stimulating constructive action, truly 'walk the talk', and gaining trust and credibility through fairness and mutually cooperative relationships.

3.2.1. Dishonesty

TCTA expects its employees to be honest and truthful in everything they do. It rejects all forms of dishonesty and has adopted a policy of zero tolerance for illegal or dishonest conduct, regardless of the consequences.

Employees of TCTA must be honest in dealings with all stakeholders, and reject all dishonest, illegal, and unethical business relationships. The organisation rejects both direct and indirect acts and forms of dishonesty as unacceptable.

3.2.2. Reporting and disclosures

TCTA **financials and reports are accurate** and must not mislead intended users. Employees must adhere to honest, accurate, and objective recording and reporting of information, whether financial or non-financial (e.g., safety, health, environmental, or operational issues).

Employees must maintain appropriate records and information to satisfy the business's operating requirements, comply with regulations and adhere to accounting reporting requirements that apply to TCTA.

All TCTA records, as well as reports produced from them, are to be kept and presented under applicable laws and must accurately reflect the organisation's operations and activities in reasonable detail.

The integrity of our reports and accounting records is based on validity, accuracy, completeness, and timeliness. Misrepresentations (whether by omission or commission) that result from intentional or negligent acts are clear contraventions of the TCTA Code of Ethics.

TCTA employees must comply with laws and rules that govern the fair and timely disclosure of material information and developments relating to the organisation and operations. They must be honest and transparent in communication and make full, accurate, timely and understandable disclosures in reports and documents.

Employees must keep funders, employees, service providers, the communities in which we operate, and the public informed on a timely basis about the TCTA's business.

3.2.3. **Bribery, fraud, corruption, and money laundering**

TCTA has **zero tolerance** to all **forms of bribery, fraud, corruption, and money laundering**. The organisation's employees must not engage in, condone, or tolerate any corrupt or dishonest practice.

It is unacceptable for any employee, service provider, director, or stakeholder to offer, pay, solicit, or accept bribes in any form, whether directly or indirectly. This applies whether the benefit is to the employee or a third party, related to the employee or not.

Employees or directors cannot offer or accept any form of inducement, regardless of the other party involved. They may not accept any benefit that could be interpreted as an attempt to influence business decisions inappropriately.

3.2.4. **Gifts and Entertainment**

TCTA employees may only accept **gifts** and entertainment that are reasonable and not excessive as defined in the Gifts Policy. Any gifts and entertainment, whether offered or received, should be reasonable and not excessive in value, given as a gesture of nurturing business relationships.

Gifts or entertainment that are excessive, unreasonable, or which may cause conflicts of interest should be tactfully declined, indicating that their acceptance violates TCTA's policy.

Gifts and entertainment should not be offered or accepted if they have the potential to compromise an individual's impartiality in performing their responsibilities. They should not be given or received if they could be perceived as creating an obligation to reciprocate in any way.

Receiving cash and cash equivalent payment is prohibited, as is giving, or receiving gifts or entertainment that contravenes any law.

3.2.5. Usage of TCTA Resources

We use **information and communication technology responsibly and professionally**. Information and communication technology resources such as computers, internet, intranet, email, social media, and telephones are important business enablers. These resources are to be applied for legitimate business activities by authorised individuals.

TCTA **may** monitor the usage of the devices it supplies for business reasons, subject to local and international laws and regulations. Employees are expected to use electronic information and communication technology in a responsible, legal, and professional manner.

Reasonable private use is tolerated on condition that employees do not violate TCTA's policies and standards of acceptable behaviour.

3.2.6. Social Media

Employees may use social media in their private capacity and time; however, this should be done in a way that does not bring TCTA into any form of disrepute or result in reputational damage to the TCTA brand.

3.2.7. Business dealings with service providers

We are honest and truthful in our **business dealings with service providers**. TCTA business obligations and interests vary from short-term to long-term in nature.

TCTA's relationships with service providers and funders are based on transparent, lawful, efficient, and fair practices. Employees must always deal truthfully with service providers and funders, treat them honestly and not engage in unfair, deceptive, or misleading practices.

Employees must never offer or accept, promise, expect or provide anything to or from a partner, supplier, or representative in exchange for or obtaining or providing an inappropriate advantage.

TCTA honours agreements entered by duly authorised employees. Employees must be transparent and honest in their intentions and negotiations and not engage in **business negotiations** or request quotations or proposals unless there are truthful business intentions.

TCTA respects the **autonomy of the service providers and funders** to decide how they do business and who they do business with. However, the organisation reserves the right to decide which entities to do business with. It will only engage with companies or institutions that have integrity and that ascribe to values and ethics similar to those of TCTA.

Employees and directors may not **misuse their official positions, status, or TCTA's** procurement spend to obtain personal benefits in terms that are not available to the public, whether directly or indirectly. Employees and directors should take active steps to avoid receiving such benefits, even if they are unsolicited.

3.2.8. Business decisions

Compliance and fair procurement practices

TCTA business decisions must be fair and just, based on policy, strategy, facts, and objective analysis and not on prejudices, irrational emotions, or other biases. Employees must consider the ethical aspects and implications of alternatives on the organisation's long-term prospects before making business decisions.

Employees must **comply with the law and adhere to fair procurement and contracting practices**. TCTA's service providers play a critical role in our ability to operate and execute our government mandate for delivering bulk raw water to the country. TCTA can achieve its objectives only if employees are trusted by our service providers, which requires the highest professional and personal ethics in our relationship with them.

Employees must respect the TCTA's service providers and, as such, act legally and provide transparent and negotiated contract terms. Service providers are afforded a fair opportunity to compete for TCTA's business in compliance with clear and transparent procurement procedures and evaluation criteria aligned with TCTA's SCM policies and the governing legislation.

TCTA is committed to contributing to broad-based black economic empowerment in South Africa. Relationships with service providers are developed based on shared values and conduct consistent with the TCTA Code of Business Conduct and Ethics. Service providers are expected to comply with legal standards and procedures at all times.

3.3. EXCELLENCE

TCTA employees must consistently give their best, deliver excellent work with agility, and think innovatively and creatively to improve performance. They must take accountability for their work.

Employees must hold themselves **accountable** to all stakeholders for acting responsibly and delivering with excellence. Earning the trust of all our stakeholders is essential to the TCTA's business and employees must hold themselves accountable for acting responsibly to all stakeholders.

As a responsible corporate citizen, the TCTA builds relationships with stakeholders based on the principles and standards outlined in its values and this Code. Stakeholders are expected to hold the organisation accountable for adhering to the commitments in this Code.

Employees must regard applicable **legal requirements** as the minimum standard in how they conduct business. All employees and directors are responsible for knowing and adhering to the laws that apply to them wherever they perform work.

TCTA employees must, inter alia, adhere to:

- The Constitution of the Republic of South Africa,
- Public Finance Management Act,
- National Water Act,
- South African tax laws,
- Labour laws,
- Project finance laws and principles,
- Infrastructure and construction laws,
- Environmental laws,
- Health and Safety laws,
- International banking laws and regulations,
- Competition laws,
- Fraud, anti-bribery, and corruption laws,
- Anti-money laundering laws,
- Intellectual property laws, and

Human rights and equal opportunity obligations. Employees must adhere to **TCTA policies and procedures**, as they drive excellence and promote ethical conduct. Whether transgressing or omitting to follow legal requirements or our approved policies, rules, and procedures, TCTA views any instance of non-compliance in a serious light. TCTA policies,

business rules, and procedures are created to ensure consistency, fairness, and effective business management.

Where the applicable laws, business rules, or procedures are lenient, employees must choose the course of integrity and apply this Code or the highest standard of behaviour.

It is a condition of their business relationship that TCTA **service providers also comply with all legal requirements, local laws, and relevant TCTA policies**. Every TCTA employee who deals with service providers should ensure they have sufficient knowledge of the services and products the service provider provides. This is to reduce risk to TCTA, whether reputational, financial, or legal. Illegal or unethical actions by our service providers, if known, must also be brought to the attention of the Compliance and Ethics Department.

Employees must subscribe to **good governance and ethical management practices**. Being accountable for acting responsibly towards our stakeholders includes committing to the sound governance of all our activities. The approach to governance, reporting, segregation of duties, and management practices at TCTA is structured and transparent. Appropriate approval processes are in place to ensure decisions are evaluated in an impartial, informed, and effective way. Where necessary, issues are escalated promptly, concisely, and accurately to the next level of management or governance authority.

Accurate accounting and reporting on financial and other matters require complete, precise, and reliable **internal controls**. All managers are required to implement internal control mechanisms in their areas of responsibility and to ensure that legal compliance and risk management processes are in line with TCTA requirements.

This responsibility extends to applying all policies and procedures and monitoring their implementation by following a structured approach to reporting, risk management, internal control, and auditing.

3.4. UNITY

TCTA employees must be committed to a common vision and goals, effective teamwork, and partnership, and contribute positively to the team's performance, spirit, and morale.

Employees should work towards creating an environment that fosters free and open communication, where their colleagues feel comfortable discussing standards of professionalism and ethical behaviour with their line managers.

3.5. GROWTH

Employees must willingly share knowledge and information, be innovative and proactive in thought and action, and TCTA encourages and provides opportunities for individual and collective growth.

Employees must conduct their engagements with other government institutions consistent with our ethical standards. While doing our business, we interact regularly with other government institutions. We engage constructively and aim to be transparent and cooperative in our dealings with all government institutions.

We are committed to **safety, health, and the protection of the environment**. The safety and health of our people and service providers, and the protection of the environment are business imperatives that require our consistent and unrelenting focus. Safety remains a top priority for everyone in TCTA. We strive to provide a safe and healthy work environment for all our employees and service providers. We are committed to achieving a safety goal of zero harm in all our projects and strive to eliminate incidents, minimize risk, and promote excellence in operational performance.

In addition to treating stakeholders with respect, as explained in this Code, we also treat the natural environment with respect. We recognise the impact our activities may have on the natural environment, and we are committed to conducting our business with care for the environment and to promoting the responsible use of natural resources. In managing our operations, we are committed to managing our company in an ethical manner that balances economic, social, and environmental needs.

4. CONFLICT OF INTEREST

TCTA employees must avoid undue **conflicts of interest** as defined in TCTA's Conflict of Interest Policy and avoid actual, potential, and perceived conflicts of interest.

Employees must not place themselves in positions where their personal interests could conflict with their obligations and responsibilities to TCTA. Employees must remain objective and make informed decisions in the best interest of TCTA in determining whether a conflict exists.

It remains TCTA employees' responsibility to manage all conflicts of interest internally. Employees must consult the TCTA Conflict of Interest Policy for approval and declaration requirements.

5. INTELLECTUAL PROPERTY

Employees and service providers must protect and not disclose any of **TCTA's intellectual property or confidential information** to outside parties that are not entitled to possess such information for legitimate business reasons.

Any disclosure of intellectual property or confidential information must be done under the TCTA POPIA/PAIA Manual and procedure.

The Board and employees must always keep confidential information secret, safeguard it from loss, theft, damage, or misuse and protect it against unauthorised access by third parties.

TCTA employees must respect and protect confidential and sensitive information that has been entrusted to them by outside parties, such as service providers. Unless required by law, such information must not be shared.

6. PROTECTED DISCLOSURES

TCTA prohibits any form of retaliation, intimidation, bullying, harassment, or victimization against an employee who, in good faith, makes a report or raises a concern. This includes concerns that an employee reasonably believes to be a violation of TCTA's Code of Professional Business and Ethical Conduct.

This anti-retaliation provision is intended to encourage all employees to cooperate with TCTA in the investigation of any matter by providing honest, truthful, and complete information without fear of retaliation.

No employee, regardless of their position, will be discharged, demoted, suspended, threatened, harassed, or otherwise adversely affected because of making a report in good faith of a possible violation of the Code. This protection extends to those assisting in the handling or investigation of allegations made in good faith.

Reports made to TCTA in bad faith, with malice, or knowingly containing false or misleading information are deemed unacceptable and may result in disciplinary action or other corrective measures.

TCTA treats all complaints of retaliation with the utmost seriousness. Each complaint will undergo a prompt review, thorough investigation, and appropriate action, which may include disciplinary measures. If you believe you have experienced retaliation, please contact the Compliance and Ethics Department.

7. ROLES AND RESPONSIBILITIES

7.1. TCTA BOARD

The TCTA Board has the responsibility to:

- 7.1.1. Approve the Code of Professional Business and Ethical Conduct, with the express intention of providing leadership on the organisational culture, fostering a workplace where such conduct is promoted.

7.2. EXECUTIVE COMMITTEE (EXCO)

EXCO is responsible for:

- 7.2.1. Providing oversight for overall implementation of and adherence to the Code.
- 7.2.2. All members of EXCO must lead by example in terms of conduct, ensuring that a healthy organisational culture is nurtured and sustained within TCTA.

7.3. MANAGERS

Managers are responsible for:

- 7.3.1. Ensuring adherence to this Policy.
- 7.3.2. Taking corrective action, in line with the Disciplinary Policy and Procedure, when

subordinates fail to adhere to the Code. (Failure to act is deemed unethical, and action will be taken against managers who overlook unprofessional and unethical conduct within their areas of responsibility).

- 7.3.3. Leading by example in terms of conduct, fostering a healthy organisational culture within TCTA.

7.4. EMPLOYEES

Employees are responsible for:

- 7.4.1. Adhering to this Policy, as it forms a condition of their employment.
- 7.4.2. Seeking clarity from the relevant manager or the Compliance and Ethics Department if uncertain about the appropriate professional business and ethical conduct.
- 7.4.3. Taking accountability for their conduct, be it right or wrong.
- 7.4.4. Upholding a culture of professionalism and ethical behaviour. As advocates for this Code, employees should proactively and respectfully engage colleagues who do not adhere to its guidelines. Should the misconduct persist, the relevant manager must be notified.
- 7.4.5. Reporting unethical behaviour using the Ethics Hotline, with the following contact details:
- 7.4.6. Telephone:
Email: ethics@tcta.co.za
Fraud line: 086 099 5309

The contact details of the TCTA Ethics Line can also be found on the TCTA intranet. The Ethics Line is a confidential and independent system through which any person can report suspected transgressions of the Code.

7.5. COMPLIANCE AND ETHICS DEPARTMENT

The Compliance and Ethics Department has the following responsibilities:

- 7.5.1. Reviewing, updating, and communicating this Policy.
- 7.5.2. Ensuring that this Policy is accessible on the TCTA intranet and the Internet.
- 7.5.3. Guiding employees seeking advice on professional business and ethical conduct.

8. COMPLIANCE AND MONITORING

Compliance with this Policy is monitored through a combined assurance approach. Instances of non-compliance or breaches of this Policy and/or its related procedures will be addressed through a consequence management process.

9. EFFECTIVE DATE AND REVIEW

This Policy shall take effect on the first day following the approval date and will undergo

regular reviews, with at least one review conducted every three (3) years. Interim reviews will also be conducted as necessary to ensure that it remains consistent and aligned with the organisation's growth, commitments, and needs.

10. REFERENCES

The Code of Conduct is the founding source and framework of our values which we are all accountable to protect, preserve, uphold, and enforce. It is underpinned by numerous TCTA policies and does not supersede the TCTA policies and procedures but must be read together with these policies. TCTA employees are expected to read and uphold all applicable policies. Some of the policies are highlighted below:

- Whistleblowing Policy and Procedure
- Conflict of Interest policy
- Social Media Policy
- Disciplinary Policy and Procedure
- PAIA and POPIA Manual