



TCTA CODE OF ETHICS



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| Policy Number | 2/P1 |
| Version Number | 01 |
| Last review date | n/a |
| Type of Policy | Strategic |
| Compiled by | Risk Division |
| Recommended by | Human Capital, Social and Ethics Committee |
| Approved by | TCTA Board |
| Signed on behalf of the Board | Board Chairman |
| Effective date | 1 November 2025 |

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1. PURPOSE

The purpose of the TCTA Code of Ethics is to explicitly define the behaviour (the way we do things) expected from TCTA employees and non-executive directors in their interactions with colleagues and stakeholders. This embodies our role as a responsible corporate organisation and employer as we deliver on our mandate.

2. SCOPE

This policy position applies to all TCTA employees, non-executive directors, contractors, and service providers/external parties working with TCTA.

3. POLICY STATEMENT

A clear grasp of value-based behaviour, combined with, among other things, an understanding of legal and regulatory requirements, policies and procedures, guides professional and ethical conduct in decision-making at TCTA. TCTA promotes an ethical culture through various mechanisms such as Combined Assurance, Performance Management, the Environmental and Social Management System, and Culture Transformation, among others.

This Code of Ethics reflects our commitment to ethical governance, responsible service delivery and the values that guide our conduct: Respect, Integrity, Unity, Growth and Excellence. TCTA is committed to ethical governance and corporate citizenship by embedding its values into all operations and stakeholder engagements. All employees, contractors and stakeholders are expected to uphold these principles in every aspect of their work.

4. CODE OF ETHICS

4.1 TCTA VALUES

TCTA's Values — **Respect, Integrity, Unity, Growth and Excellence** — underpin our organisational culture and way of working. TCTA acknowledges that an ethical culture is Central to our governance and performance, both collectively and as individuals. TCTA's governing body is committed to TCTA being led ethically and effectively, exemplified by integrity, competence, responsibility, accountability, fairness, and transparency.

4.1.1 RESPECT

TCTA acknowledges and embraces diversity and is responsive to the needs of its employees, communities, stakeholders, and the environment. We honour the dignity, rights and diversity of all individuals and communities. We engage our stakeholders with empathy, fairness, and cultural sensitivity. We protect and preserve water resources and the natural environment.

4.1.2 INTEGRITY

TCTA rejects all forms of dishonesty and has adopted a policy of zero tolerance for illegal or dishonest conduct, regardless of the consequences. TCTA employees, Non-Executive Directors, contractors, and service providers are expected to act honestly in all dealings with stakeholders and reject all dishonest, illegal, and unethical business practices. TCTA considers both direct and indirect acts and forms of dishonesty, fraud, unethical behaviour, and similar actions as unacceptable.

All TCTA procurement of goods and services shall be in line with the constitutional guidelines. Integrity guides TCTA's project planning, execution, and oversight, ensuring ethical conduct in all environments and in our engagement with affected individuals and communities.

4.1.3 EXCELLENCE

We commit to embracing and enhancing a culture of excellence, holding ourselves to the highest level of performance, quality input, and output, contributing to a successful, professional, and progressive TCTA.

TCTA implements a continual improvement approach to its management of environmental and social sustainability risks and opportunities (through the Environmental and Social Management System).

4.1.4 UNITY

TCTA fosters collaboration across teams, departments, and communities. Employees/ Non-Executive Directors /contractors and service providers work together to achieve shared goals for national benefit. The organisation promotes inclusivity and values diverse perspectives. TCTA emphasises the importance of interdisciplinary collaboration and contributions to ensure the ethical management of social and environmental risks and opportunities, as well as the organisation's objectives and goals.

4.1.5 GROWTH

TCTA encourages and provides opportunities for individual and collective growth and development, availing a conducive environment through exposure, advancement, and formal training.

4.2 HUMAN RIGHTS

TCTA is committed to upholding the fundamental human rights of all individuals, as enshrined in the Constitution of the Republic of South Africa and all international laws and covenants. This commitment is reflected in its operations, stakeholder relationships, and workplace practices.

The organisation promotes dignity, fairness, and respect, and prohibits discrimination, child and/or forced labour.

TCTA recognises every person's freedom of association, right to fair remuneration, safe working conditions and abides by environmentally sustainable business practices.

All employees and stakeholders have a duty and responsibility to observe and respect these principles, which are aligned with TCTA's core values of Excellence, Integrity, Respect, Unity, and Growth.

4.3 ENVIRONMENTAL AND SOCIAL SUSTAINABILITY

Environmental and social sustainability aspects, risks, and opportunities are accounted for throughout the lifecycle of all TCTA operations. TCTA recognises that its projects and operations result in impacts of varying significance on the receiving environments and their inhabitants and vice versa.

We uphold social and environmental rights, preventing, limiting and, where unavoidable, mitigating negative impacts of doing business. Concurrently, we invest in enhancing and leveraging positive impacts towards sustainable development. Environmental and Social Sustainability Objectives embody TCTA's commitment to being a Responsible Corporate Citizen and Integrative Environmental Management.

5. EFFECTIVE DATE AND REVIEW

This Policy shall become effective on the first day following the approval date and shall be reviewed at least every three (3) years. Interim reviews will be conducted as required to ensure that this Code remains consistent and aligned with the organisation's growth, commitments, and needs.

6. ANNEXURES

6.1 ANNEXURE A: THE ETHICS PLEDGE (EMPLOYEES/NON-EXECUTIVE DIRECTORS)

I, _____, as an employee or Non-executive Director of Trans- Caledon Tunnel Authority (hereinafter referred to as TCTA), pledge to conduct myself in a sound ethical manner, guided by the core values of *Excellence, Integrity, Respect, Unity, and Growth*. I commit to contributing to TCTA's mission of being a world-class enabler of sustainable infrastructure for a water-secure South Africa. To this end, I solemnly commit to adhering faithfully to the following in the performance of my duties:

1. I pledge to always act in the best interests of TCTA, South Africa and our stakeholders.
2. I pledge to perform my duties with pride and dignity and to fully comply with all applicable local and international laws and ethical standards applicable to TCTA.
3. I pledge to listen, understand, maintain discipline, and strive for mutual consensus in all my interactions with internal and external stakeholders. I will treat everyone, irrespective of their cultural background, fairly and respectfully and act with integrity in all my dealings.
4. I pledge to protect TCTA's confidential information, refraining from disclosing it to external parties or benefiting myself, friends, family or other businesses or individuals unlawfully. I will use such information within TCTA only for legitimate business purposes.
5. I pledge not to engage in any actions or behaviours that may compromise the image or interests of TCTA.
6. I pledge to use work hours and TCTA assets solely for TCTA-related activities and not for personal or external business purposes.
7. I pledge not to engage in any actions that are unauthorised by TCTA.

I further commit to ethical behaviour by adhering to the highest professional and personal responsibility standards, being accountable for my actions, being reliable, trustworthy, and executing all my commitments, even when unobserved.

TCTA – A new word for water.

Signature: _____

Date: _____

6.2 ANNEXURE B: THE ETHICS PLEDGE (SERVICE PROVIDERS/CONTRACTOR)

I, _____, as a service provider [or contractor] of Trans- Caledon Tunnel Authority (hereinafter referred to as TCTA), pledge to conduct myself in a sound ethical manner, guided by the core values of *Excellence, Integrity, Respect, Unity, and Growth*. I commit to contributing to TCTA's mission of being a world-class enabler of sustainable infrastructure for a water-secure South Africa. To this end, I solemnly commit to adhering to the following:

1. I pledge to always act in the best interests of TCTA, South Africa and our stakeholders.
2. I pledge to perform my contracted responsibilities with pride and dignity and to fully comply with all applicable local and international laws and ethical standards applicable to TCTA.
3. I pledge to listen, understand, maintain discipline, and strive for mutual consensus in all my interactions with internal and external stakeholders. I will treat everyone, irrespective of their cultural background, fairly and respectfully and act with integrity in all my dealings.
4. I pledge to protect TCTA's confidential information, refraining from disclosing it to external parties or benefiting myself, friends, family or other businesses or individuals unlawfully. I will use such information within TCTA only for legitimate business purposes.
5. I pledge not to engage in any actions or behaviours that may compromise the image or interests of TCTA.
6. I pledge to use TCTA assets, systems, information, and access only for authorised and legitimate contractual purposes and not for personal or external business gain.
7. I pledge not to engage in any actions that are unauthorised by TCTA.
8. I pledge to report any unethical behaviour, conflicts of interest or breaches of this Code that I become aware of in the course of my service.

I further commit to ethical behaviour by adhering to the highest professional and personal responsibility standards, being accountable for my actions, being reliable, trustworthy, and executing all my commitments, even when unobserved.

This pledge forms part of the contractual obligations of all service providers and contractors to TCTA.

TCTA – A new word for water.

Signature: _____

Date: _____