



# Integrity Builds Success

2023 Integrity Report



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# A Message from our President and our CEO and Chief ESG & Integrity Officer

We are pleased to unveil the second edition of our Annual Integrity Report. Building upon the groundwork laid in our first release, this year's report underscores our enduring commitment to upholding the highest standards of integrity across all aspects of our operations.

Within these pages, you will find more than just figures and data; you will discover a compelling narrative that vividly portrays our integrity culture and the relentless efforts invested to nurture it. From the meticulous implementation of compliance measures to the championing of a values-driven ethos, each section reflects our unwavering dedication to fostering an environment where integrity flourishes.

As we navigate the complexities of the business landscape, our integrity program remains agile, evolving alongside our organization's growth. This report showcases that evolution, highlighting our progress, milestones, and accomplishments over the past year.

We extend our sincere gratitude to our external partners and internal network of Integrity Ambassadors for their invaluable contributions. Their insights have been instrumental in shaping this report, ensuring it aligns with global best practices and resonates with our shared values.

At AtkinsRéalis, each of us plays a vital role in maintaining our culture of integrity, guided by our unwavering principles of ethics, transparency and accountability.

We invite you to immerse yourself in the contents of this report reflecting our collective journey and the principles that define us.



**Ian L. Edwards**  
President and CEO



**Hentie Dirker**  
Chief ESG and Integrity Officer



# A Culture of Integrity

## Integrity Culture Survey

In 2023, a survey was conducted to assess our culture of integrity and identify our key priorities and evaluate the integrity portion of our Annual Incentive Program (AIP).

The survey is managed independently by Ethisphere, a global center for research, best practices and thought leadership in ethics and compliance. The input from our employees is essential to learn how to improve the way we implement our integrity program, and to maintain a company culture we can all be proud of. The results show our evolution as an organization since 2022 and how we must continue to work together to ensure that our commitment towards integrity stays strong.

AtkinsRéalis' assessment findings were compared against a hand-picked assortment of companies from Ethisphere's database of nearly 300 ethical culture survey projects. Survey data in this benchmark includes 42,096 respondents from 11 companies that meet the following criteria:

## Benchmark groups

**Companies in the Engineering & Construction services and/or Business & Professional services sectors**

**Data collected from surveys administered in the past two years (between 2021 and 2023)**

**Four benchmark companies have at least 25,000 employees worldwide**



# A Culture of Integrity

## Integrity Culture Survey Results

In 2023, we continued to evaluate our culture by leveraging an annual pulse survey administered by Ethisphere, analyzing 7 pillars of ethical culture. All the employees across the organization were asked to participate. Ethisphere received 14,559 completed surveys for a response rate of 41%. The survey was made available in 5 languages (English, French, Spanish, Portuguese and Chinese)

The results were rated against two benchmarks: our own score from the previous year and an external aggregated score of our industry peers\*.

Our overall global performance score increased by 0.9 points to 88.1 % compared to the 2022 survey\*. This score positioned us 4.7 points above the external benchmark.

### Culture Quote Score

A temperature check of how AtkinsRéalis performed as an organization against benchmark.

### Performance by Pillar

#### Ethical Cultural Assessment

AtkinsRéalis’ performance across Ethisphere’s 7 pillars of ethical culture as compared to benchmark and previous survey results. Pillar “Perception of the Function” was not included in recent surveys.



AtkinsRéalis Culture Quotient Score

88.1

Benchmark Culture Quotient Score

83.4

\* For a description of Ethisphere’s scoring methodology, visit <https://ethisphere.com/cq-scoring-methodology/>



# A Culture of Integrity

## Observing and Reporting Misconduct

The survey revealed a strong improvement on our speak-up culture, and we also continue to score higher than the benchmark. We will continue to put the emphasis on this pillar, thanks to global and local communication and training campaigns. The tone from the top is also crucial to ensure we foster an environment where everyone feels psychologically safe to speak-up.

Integrity expectations regarding observing and reporting misconduct are clearly set out and embedded into our culture, thanks to a variety of annual communication initiatives.

Year after year, we continue to score higher than the industry benchmark as a result of varied and effective efforts to raise awareness of our speak-up culture and reinforcing the message around our zero tolerance for retaliation.

Question		AtkinsRéalis Result		Benchmark	Comparison
I am aware the company has a non-retaliation policy that prohibits retaliation against employees who report misconduct in good faith.	2023	94,5	5,5	83.2	+11.3
	2022	91,7	8,3		
	2021	90,8	9,2		
	2020	85,8	14,2		
I believe the company follows and supports its policy on non-retaliation against those who report actual or suspected misconduct in good faith.	2023	82,2	16,3	74.1	+8.1
	2022	78,4	19,7		
	2021	76,1	22,1		
	2020	74,6	24,0		
I believe my manager and leadership team follow and support our policy on non-retaliation against those who report actual or suspected misconduct in good faith.	2023	88,1	10,5	87.2	+0.9
	2022	85,3	13,5		
	2021	83,9	14,2		
	2020	83,6	15,0		

■ Favorable Responses (%)
 ■ Neutral Responses (%)
 ■ Unfavorable Responses (%)



# A Culture of Integrity

## Manager Perceptions

When segmenting respondents by frequency of manager communications on integrity, we saw a clear trend between communications done by line managers and the awareness of the Integrity program, the comfort in approaching their line manager, and the organizational justice.

This reinforced our belief that line managers have a pivotal role in building and reinforcing a culture of integrity. We continue to support all managers in their efforts to communicate frequently with their employees by providing resources to help them choose topics that are meaningful for them and help them deliver their communications in an engaging format.

## Pillar: Manager Perceptions



# A Culture of Integrity

## Annual Incentive Plan

Our Annual Incentive Plan (AIP) is comprised of financial and non-financial measures. Integrity being one of our core values, we decided as an organization to include specific targets and measures regarding our Culture of Integrity.

In 2023, the Integrity portion of the AIP encompassed specific measures:

### **Positive Integrity Culture Development**

The results from the 2023 Integrity Culture Survey, which focused on promoting communications including speaking up, organizational justice, and pressure, was compared to the results from the same survey administered in 2022.

### **Completion of the Integrity Mandatory Training**

It is expected that everyone complete their mandatory Integrity modules on time. If there are any mandatory integrity training modules not completed as of December 31, 2023 as allocated before October 1, 2023, 100% of the ESG & Integrity component will be eliminated and in addition 100% of total AIP bonus payout will be withheld until completion of any overdue mandatory training if not done by date of payout.

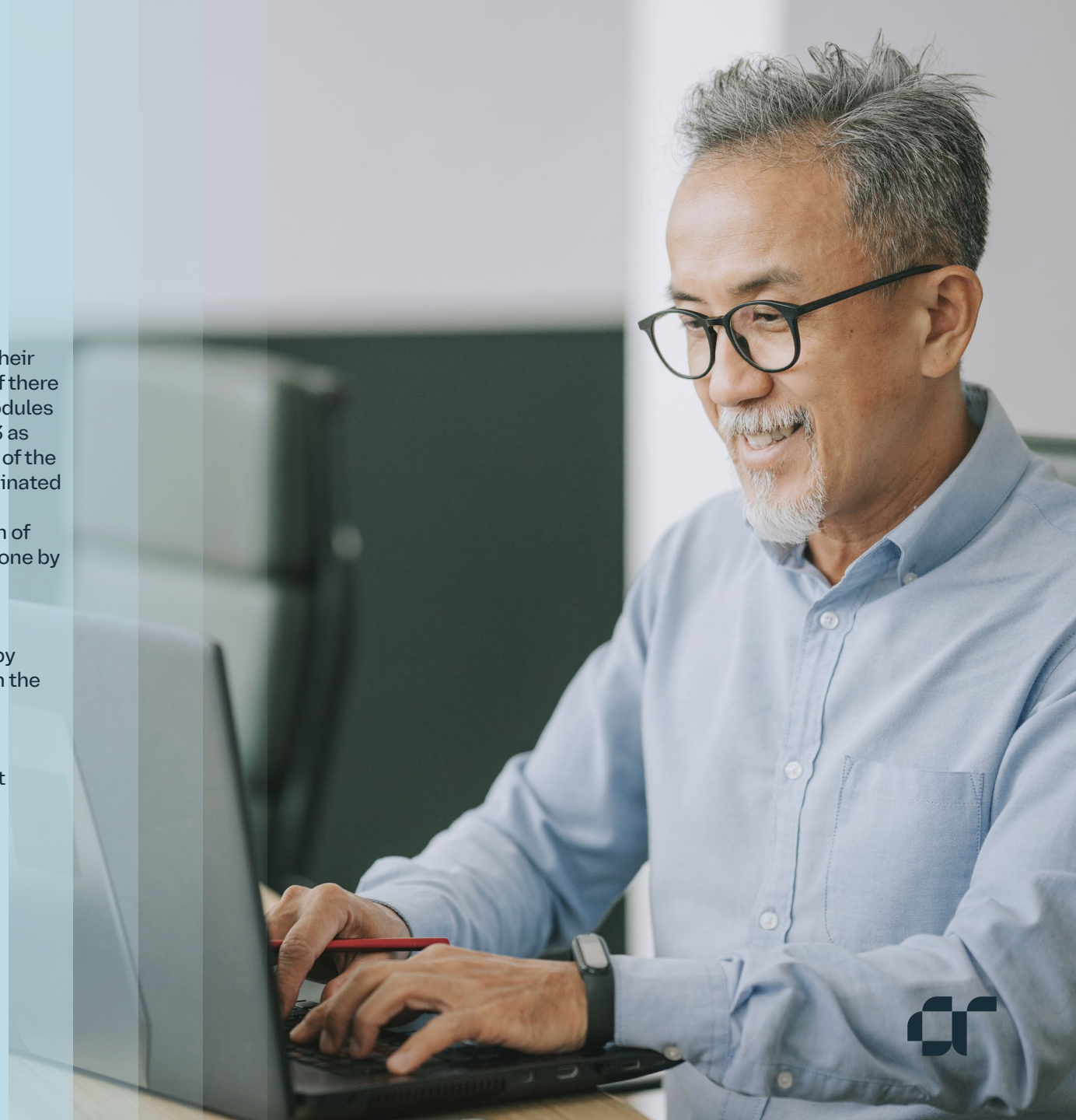
### **Other Measures**

Other measures determined on a case by case basis can also trigger an impact on the Integrity portion of the AIP.

### **2022 outcomes**

For the 2022 AIP\*, 43 employees did not receive 50% of their Integrity portion.

\*The 2022 bonus payout was in Q1 2023.





# A Culture of Integrity

## Integrity Ambassador Program

The Integrity Ambassador Program aims to expand the Integrity footprint from an awareness and communication perspective, foster a business environment that is committed to ethical practices and provide additional local support to employees. Ambassadors act as points of contact for the Integrity function, assist with on-location and in-person follow-ups for Integrity matters where necessary, and participate in management meetings to communicate news and developments as they relate to Integrity.

We maintained 115 Integrity Ambassadors through 2023, consolidating our global network and leveraging a collaborative platform for Ambassadors for communication and community engagement. We also launched the first virtual Ambassador summit in 2023. It was a great opportunity to present the Integrity program, talk about their role and responsibility and create commitment.

## Annual Integrity Awards

Each year, we recognize the colleagues that embody our value of integrity, people who have gone above and beyond in speaking up against misconduct, raising awareness of integrity issues, demonstrating ethical leadership, or setting examples of ethical behaviour.

The 2023 Global Integrity Awards process was revamped to produce more organic nominations across a longer period by tapping into an existing global employee recognition program and hand-picking winners based on merit with regional calibrations. We anonymized the process working closely with the Equality, Diversity and Inclusion team to ensure we removed all possible bias.

There were 50 winners from all 5 regions in 2023.



# Tools & Controls

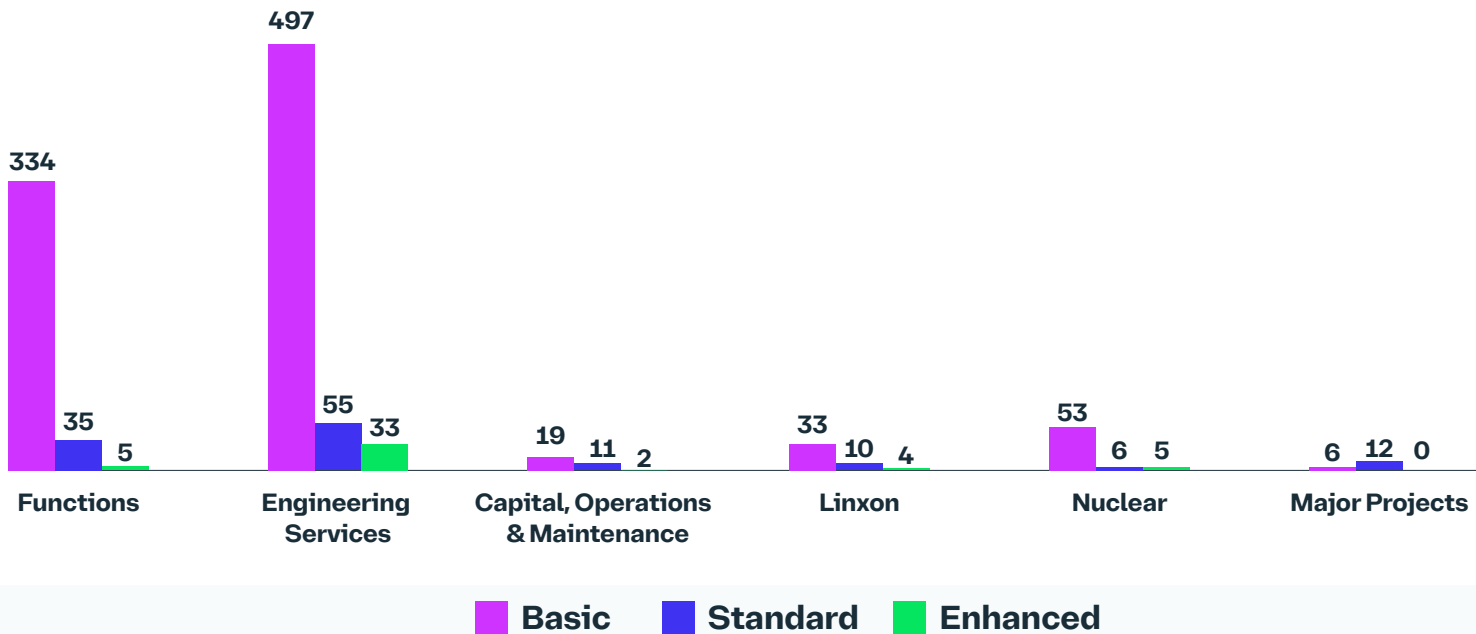
## Managing Third-Party Integrity Risk

Our Integrity program includes a comprehensive third-party risk management program. The program is designed to ensure that AtkinsRéalis only works with reputable third parties and that our organization takes well-informed decisions when engaging with third parties.

All third parties we work with are screened against a compliance risk database and each engagement is risk-assessed to determine the inherent integrity risk of each engagement. The risk assessment determines whether the engagement requires additional due diligence and approvals and if so, segments them further into a Basic, Standard or Enhanced risk level. This segmentation then prescribes additional controls, approvals reviews and post-approval activities for each risk level.

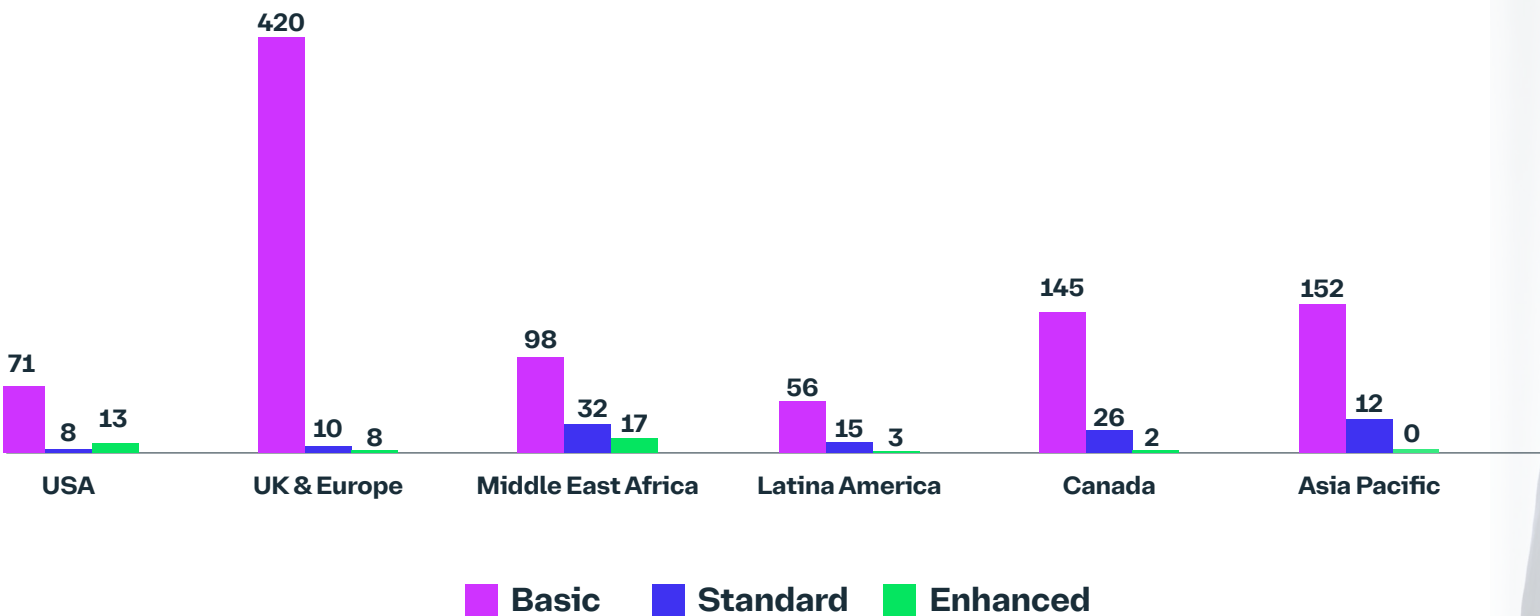
In November 2023, we introduced a new Vendor Management System (VMS) that further enhances our in-system controls and improves compliance across the business. The new platform offers rich risk management and data analytics capabilities that will allow us to manage Vendor integrity risk in a much more robust way.

Volume of active business partner engagements by sector/risk level in 2023



# Tools & Controls

Volume of active business partner engagements by region/risk level in 2023





# Tools & Controls

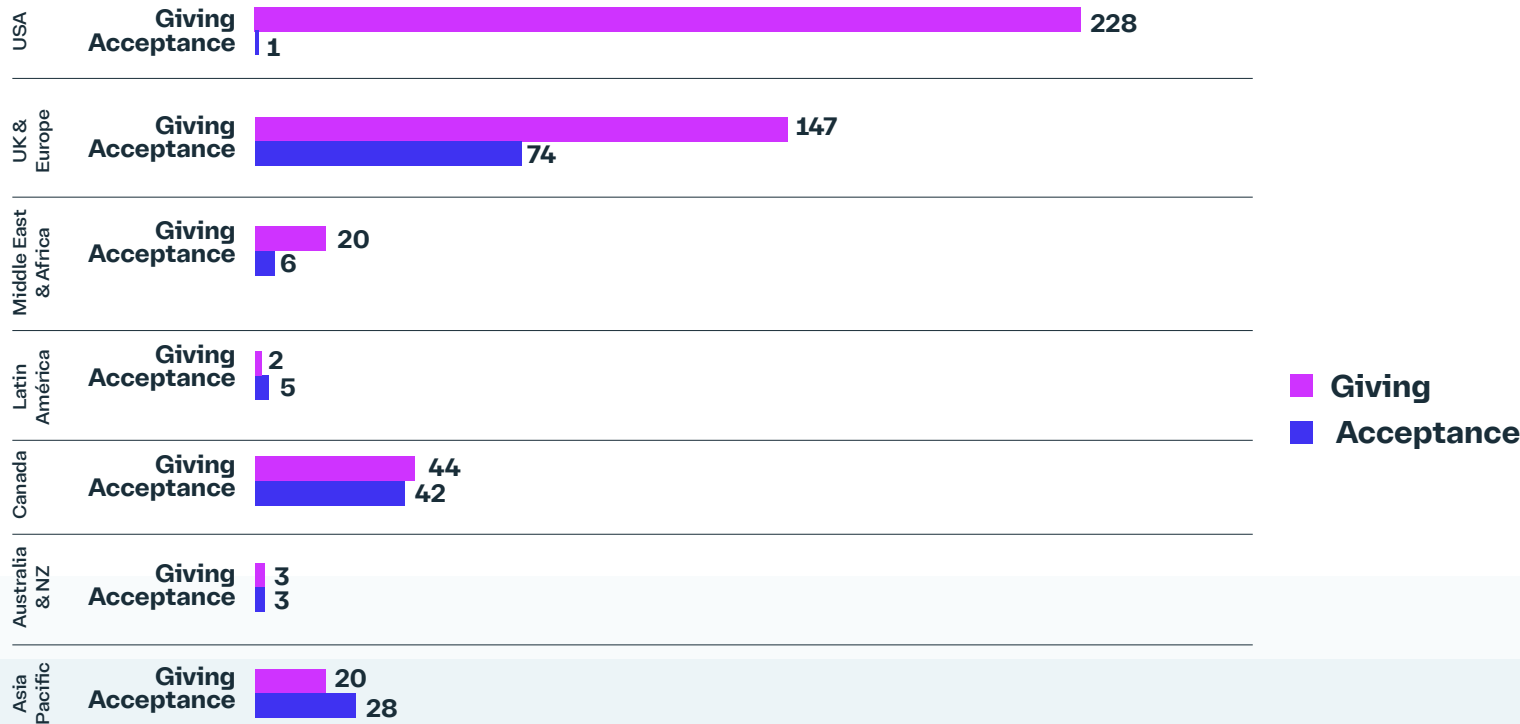
## Gifts & Hospitality

At AtkinsRéalis, we understand that the exchange of gifts and hospitality can be a part of fostering business relationships. However, we are also aware of the potential risks these practices may pose, such as the perception of undue influence or conflicts of interest.

To address this, our Code of Conduct and Compliance Procedure outline clear principles and guidelines that must be followed before offering or accepting any benefits to or from a third party.

To improve compliance and disclosure, we updated our processes when we introduced an Integrity Approvals platform in early 2023. We centralized the review and approval of all requests while the new platform offers a robust approvals and decision-making workflow, facilitates compliance risk screening and offers rich data analytics capabilities.

## Volume of Scorecards by Region





# Learning & Engagement

## Mandatory Integrity Training

Our team is comprised of employees tasked with developing integrity modules to ensure that they meet our business needs and reflect our policies and procedures. In addition to online training, we deliver ongoing live anti-corruption training.

The content of each mandatory training module is reviewed and updated annually to always offer the latest information and to keep our delivery methods fresh and engaging.

In 2023, our 31,000+ Learning Management System (LMS) users had access to 41 Integrity eLearning modules in up to 9 languages, for a total of over 80 modules. Out of these 41 eLearning modules, 22 were mandatory depending on the employee's role. Additional

employees with no access to our LMS were able to complete their annual Code of Conduct Certification on an external platform.

In 2023, our Gifts and hospitality refresher training was completely revamped to include a new video and new questions. Our Business partner core and refresher trainings were revamped to include new questions and updated information. We completely revamped the Anti-corruption training to include new scenarios and a stronger focus on the consequences of corruption and the reach of the Integrity Program.

The table on the following page summarizes what trainings were offered to which types of employee, the duration of each module, and how many languages the modules were offered in 2023.



# Learning & Engagement

Mandatory Trainings	Duration	Languages	Number Trained
2023 Code of Conduct Certification	25 mins	9	35,297
2023 Certification for Leaders	10 mins	4	2,374
2023 Code of Conduct - Continuous	10 mins/month	9	N/A
Anti-corruption training	90 mins	2	464
Anti-corruption training (2-yr refresher)	45 mins	6	290
Anti-corruption training (4-yr refresher)	15 mins	4	298
Antitrust and competition	30 mins	4	1,981
Antitrust and competition (2-yr refresher)	10 mins	4	1,239
Avoiding Trafficked Labour	40 mins	6	658
Business Partner CDD	30 mins	4	2,951
Business Partner CDD (2-yr refresher)	10 mins	4	1,873
Business Partner CDD (4-yr refresher)	30 mins	4	2,876
Data Privacy Compliance	30 mins	8	9,266
Data Privacy Compliance (2-yr refresher)	10 mins	4	6,370

Mandatory Trainings	Duration	Languages	Number Trained
Doing business with the Government of Canada	30 mins	2	346
Doing business with the Government of Québec	30 mins	2	187
Gifts & Hospitality (2-yr refresher)	30 mins	4	2,404
Gifts & Hospitality	10 mins	4	1,542
Gifts & Hospitality (4-yr refresher)	30 mins	4	1,461
Hiring of Canadian government employees or former employees or their immediate family members	30 mins	2	459
Hiring of civil servants or former civil servants of the Government of Québec or members of their immediate family	30 mins	2	240
The Insider	10 mins	7	8,473
Trade Controls and Sanctions (Awareness)	5 min	4	2,453



# Learning & Engagement

## New Training Initiatives

In 2023 according to the remediation agreement, we launched 4 new eLearning modules, they were assigned to a specific and limited target audience:

- Doing business with the Government of Canada
- Doing business with the Government of Québec
- Hiring of Canadian government employees or former employees or their immediate family members
- Hiring of civil servants or former civil servants of the Government of Québec or members of their immediate family

We completely revamped our Gifts and Hospitality modules to reflect the new Integrity Gateway tool and updated processes.

In 2023 we introduced the concept of interactive story in the annual Code of Conduct Certification. The user was invited to visit three different chapters where they were prompted to answer 15 questions on Code of Conduct related topics. Once they completed all 15 questions, they unlocked an interactive story where they were asked to make choices and consider the application of our Code.

## Integrity Initiatives & Communications

In addition to a topical monthly blog from our Chief ESG & Integrity Officer, we delivered global communications on the following topics in 2023:

### January

The launch of our 2024 Code of Conduct

### February

New Gifts and Hospitality tool named Integrity Gateway

### April

Reporting an issue or concern - communication campaign focused on our duty to report and our non-retaliation policy

### July

World Day Against Trafficking in Persons – with links to the UN page, our 2023 Modern Slavery and Human Trafficking Statement, and a reading list covering different aspects of the issue

### August

The importance of recognizing colleagues for demonstrating the value of integrity using our internal Employee Recognition Program

### September

- Integrity Culture Survey
- First Integrity Report
- Brandon Hall Award for our 2023 Code of Conduct Certification

### November

- Seasonal Gifts and Hospitality awareness
- New Vendor Management system and Thirs-Party Risk Management

### December

- Anti-Corruption Day – awareness campaign
- Integrity Awards recognition



# Reporting

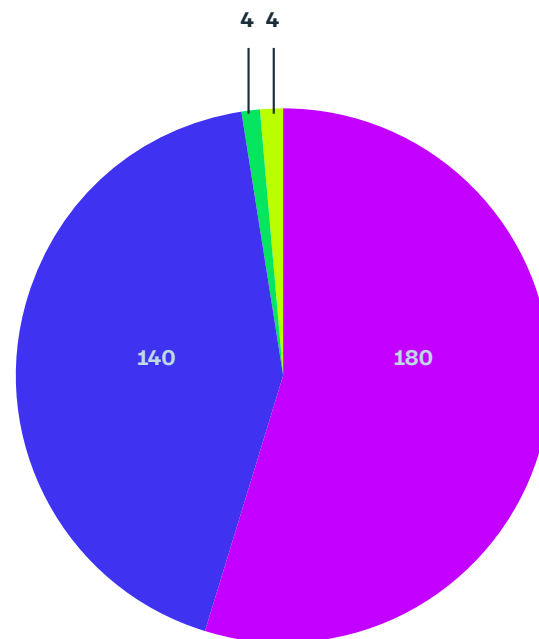
## Concerned Raised

In 2023, we received a total of 328 allegations, 140 of them were made anonymously through different reporting channels (see chart below). We also closed a total of 297 allegations, including some made during the previous years. The disciplinary actions taken to respond to compliance related wrongdoings confirmed after thorough investigations are summarized in the list below.

### Reporting channels

Allegations were made via:

- **The Reporting Line (operated by a secured third-party provider)**
- **Email**
- **Phone**
- **Other**
- **Total allegations received in 2023: 328**
- **Allegations transmitted anonymously: 140**
- **Allegations closed: 297** (includes allegations from previous years)



## Investigation Outcomes

There were 30 disciplinary sanctions in 2023, excluding flags in the files of former employees, of which there were 4.

### Integrity Investigations cases only

- **Other sanctions including verbal and written reminders: 13**
- **Verbal warnings: 3**
- **Written warnings: 13**
- **Terminations: 1**

The disciplinary sanctions in 2023 relate to the following categories of wrongdoings:

### Fraud

- **Written Warnings: 6**
- **Verbal Reminders: 1**
- **Terminations: 1**

### Conflicts of Interest

- **Verbal Reminders: 1**
- **Verbal Warnings: 1**

### Competition

- **Verbal Reminders: 2**
- **Verbal Warnings: 2**

### Other\*

- **Verbal Reminders: 9**
- **Written Warnings: 7**

\* Other category includes issues that do not fall within the existing major categories and may include non-compliance with policies and procedures, retaliation, failure to report, etc.





# Beyond AtkinsRéalis

## Human rights

At AtkinsRéalis, we will not knowingly be complicit of human rights abuses. We work towards preventing forced labor, child labor modern slavery and human trafficking, including in our supply chain, and protecting individuals working directly or indirectly for AtkinsRéalis from any form of forced labor, child labor, modern slavery and human trafficking.

Our Human Rights Policy and Modern Slavery and Human Trafficking Statement are available on the Company's website at [www.atkinsrealis.com](http://www.atkinsrealis.com).

Our **Modern Slavery and Human Trafficking Statement** looks at:

- Structure, Operations and Supply Chain
- Risks
- Craft Labour Workers
- Recruitment Process
- Policies and Procedures
- Duty to Report
- Due Diligence
- Training and Awareness
- Aligning with Global Initiatives and Best Practices
- Compliance Control Framework

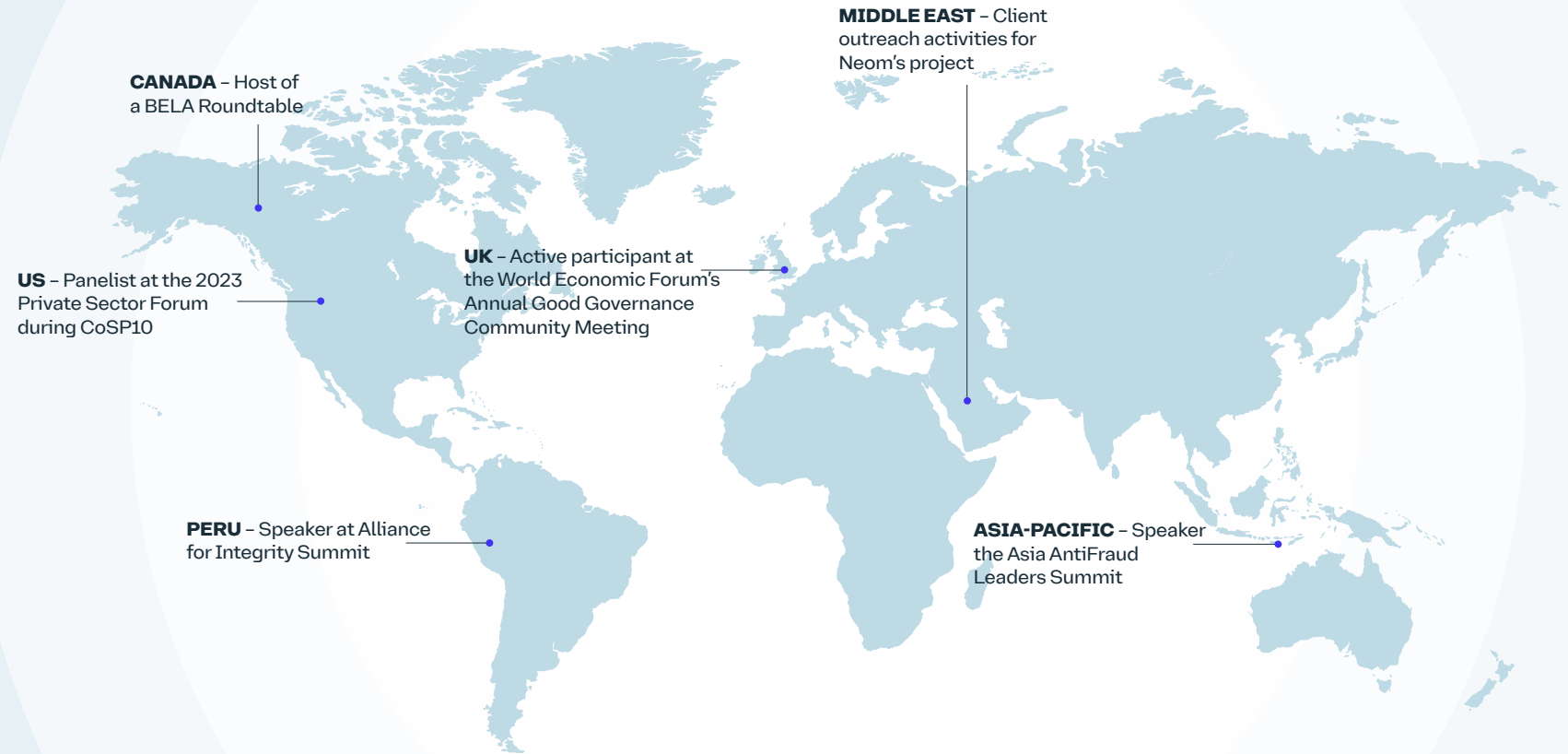


# Beyond AtkinsRéalis

## Outreach Activities

In the spirit of sharing our journey with and learning from our peers, AtkinsRéalis has engaged with academic institutions, participated in industry conferences, and presented to clients and business partners on our integrity program.

We are not only looking to reach and maintain the highest standards for ourselves, but also to do our part to help the industry at large become more sustainable and more ethical.



# Beyond AtkinsRéalis

## Outreach Activities

We support global anti-corruption efforts and continue to encourage a constructive dialogue between governments, industries and business. To this extent, we share our story and our learning to help others in their journey to ethics and compliance excellence.

We participate in various initiatives to promote fair and equal market conditions:

- Actively supporting OECD's Global Initiative to Galvanize the Private Sector as Partners in Combatting Corruption<sup>1\*</sup> (GPS), BIAC's Anti-Corruption Committee, and Trust in Business Initiative;
- Member of the World Economic Forum Global Future Council focused on the future of Good Corporate Governance and Partnering Against Corruption Initiative (PACI); <sup>2\*</sup>
- Member of Ethisphere's Business Ethics Leadership Alliance (BELA) is a thriving global community of leading organizations shaping the ethics, compliance, and ESG landscape with proven tools, data, and resources.<sup>3\*</sup>



1-<https://www.oecd.org/corruption-integrity/getinvolved/private-sector/#:~:text=The%20OECD%27s%20Global%20Initiative%20to,corruption%20and%20integrity%2C%20and%20inform.>

2-<https://www.weforum.org/communities/partnering-against-corruption-initiative/>

3-<https://bela.ethisphere.com/>



# Beyond AtkinsRéalis

## Industry Recognition:

### Compliance Leader Certification

- Receiving the Compliance Leader Verification for the third consecutive time sets us apart as an organization dedicated to ethical business practices. This recognition demonstrates our ongoing commitment to transparency, accountability, and responsible business conduct.

### Gold Award for the Code of Conduct Certification

- We won the prestigious gold award for our outstanding performance in the 2023 Code of Conduct Certification. This achievement has been recognized at the Brandon Hall Group HCM Excellence Awards™, celebrating and acknowledging exemplary practices in various fields such as learning and development, talent management, and leadership development. This recognition reflects the collective effort put forth by our Integrity team, underscoring our commitment to upholding the highest standards of ethics and integrity.





# What's Next?

## Evolution of the Program

We have seen tangible progress in our company-wide aim to live our values, and the results of our annual integrity culture survey have also delivered a clear roadmap to further improvement. The Integrity team is inspired to balance our strengths while improving our effectiveness across the board by developing and introducing tools and resources that truly facilitate doing business with integrity.

## Practical Tools and Better Data

We worked on the integration of the vendor management and risk management by collaborating with Procurement. This platform incorporates our current Integrity Supplier and Business Partner risk processes into one seamless platform.

## Improving and Enhancing the Process

In early 2023, we launched a new platform for managing the disclosure and approval of Gifts and hospitality – Integrity Gateway. The platform is easy to use, collects better data and thus offers better insights. We are able to analyze how and where our business engages with third parties through giving and receiving gifts and hospitality, see trends and the largest areas of spend on these activities and the largest recipients of our gifts and hospitality.

Overall, our focus is on making compliance tools easier to use, strengthening in-system controls, and unifying related processes. This improves compliance, consistency, and oversight across our integrity program.



# Integrity Builds Success

2023 Integrity Report

