



William Buck Code

From the outset our founder, Mr William Buck, recognised we have the opportunity to make a lasting impact on those who would interact with our firm. Over 120 years later, we continue to be motivated by this pursuit encapsulated in our collective vision 'Changing Lives.'

Our Code of Conduct is an extension of our shared values and culture; where our people lead with expertise and passion, serve with purpose and professionalism and love to share their insights and expertise to help others.

We should always apply our principles centred around integrity, professional competence and due care, confidentiality and personal behaviour. Our Code is a guide to ensure we act in the best interests of our clients, by demonstrating appropriate behaviours in a rapidly changing landscape where we will be challenged with new types of ethical dilemmas whilst upholding our proud reputation for quality and service excellence.

We also apply the same principles when dealing with our peers to ensure everyone within the William Buck community is treated with respect and feels appreciated.

Nick Hatzistergos

How do I apply the Code of Conduct?

When you are reviewing the Code of Conduct (Code), consider how it applies to your own experience and work obligations, and keep in mind that it cannot and does not cover every situation.

The requirements in the Code can be referenced back to:

- APES 110 *Code of Ethics for Professional Accountants*
- NZICA *Code of Ethics*
- Other professional body codes

Everyone has a personal responsibility to identify concerns in good faith through consultation or reporting, and failure to comply with the Code may mean that William Buck has been put at risk. If you are unsure of the correct course of action, or if you are faced with an ethical dilemma, the following ethical decision framework may be useful to guide your judgement:

- identify the right thing to do
- ask if in doubt about what is right
- choose to do the right thing

Questions to consider when making a choice might be:

- Is it in accordance with William Buck policy or professional standards?
- Does it make me feel uncomfortable?
- Would I be embarrassed if others knew I made this choice?
- Are there better alternatives?
- Might it harm William Buck's reputation if it was revealed publicly?
- Might others be affected adversely?

Resolving or reporting concerns?

If the issue cannot be resolved with open discussion and consultation, or when confidential assistance is preferred, the matter must be referred directly to the General Manager or Managing Director in your location.

Remember everyone in William Buck has a personal responsibility to follow through on any concern they may have, and that it is not acceptable to leave ethical issues unresolved.

Failure to act will be viewed as a breach of the Code.

William Buck Code of Conduct

The Code provides the ethical framework on which we base our decisions as individuals, as members of your office and as members of the William Buck Network. The code expresses our values and beliefs, and underpins all that we do.

Our Code is organised into five categories containing guiding principles that should be used by everyone within William Buck to guide behaviour across all areas of activity.

1. Act with integrity
2. Maintain our objectivity and independence
3. Working with each other
4. Working with clients, regulators and others
5. Respect our knowledge and intellectual property

Whenever we encounter an ethical issue, we each have the responsibility to respond in a manner that reflects our values in action, including the responsibility to speak up when we observe any behaviours that we believe does not live up to the principles of the Code. If you do not understand the principles contained in the Code, or are unsure how to apply them, you should consult with an appropriate colleague to answer your questions. An appropriate colleague will depend on the issue, it may be your manager or director, or it could be human resources, your General Manager or your Managing Director.

Your Commitment

The William Buck Code applies to all directors and employees of William Buck, including contractors, consultants, work experience students, secondees and volunteers as William Buck “employees”.

Your commitment is to:

- Promote and support the Code in your daily business activities, through both personal leadership and business practice.
- Behave according to the principles contained in the Code and understand it is your responsibility to read, understand and comply with the Code. If needed, you will consult and seek advice on applying the Code.
- Understand that deviations from or violations of the Code are unacceptable and that you should feel able to raise them with an appropriate person, without any negative consequences.
- Acknowledge that non-compliance with the Code may result in sanctions, up to and including termination of employment.

William Buck’s Commitment

When a concern is reported, William Buck’s commitment is that:

- the query or concern will receive a timely response
- investigation will be conducted with dignity and respect
- the issue will be addressed and resolved appropriately
- individuals will be protected from reprisal

1. Act with integrity

Integrity - to be straight forward and honest in professional relationships. Integrity also implies fair dealing and truthfulness. (APES 110.110.1 A1(a) & NZICA Code of Ethics 110.1).

What does this mean? It means doing the right thing in all circumstances, even if no one is watching.

- We put honesty and integrity above the desire for personal reward, growth and profitability and never use confidential information for personal gain
- We behave with courtesy and consideration and in a manner conducive to the good reputation of William Buck and the profession generally
- We understand and comply with William Buck policies and procedures
- We address any concerns in good faith and consult or report issues promptly
- We never destroy or alter documents, or recommend their destruction or alteration for any illegal or improper reason

2. Maintaining objectivity and independence

Objectivity – to not compromise professional or business judgements because of bias, conflict of interest or undue influence of others (APES 110.110 A1(b) & NZICA Code of Ethics 12.1).

- We provide impartial advice based on a full analysis of all available relevant data, and do not allow bias, conflict of interest or undue influence of others to override our professional or business judgements
- We are transparent in our actions and communications in order to minimise ambiguity and to build relationships based on trust
- We employ professional scepticism
- We report any situation where a report or communication is suspected of containing false or misleading information which by association, could undermine our integrity
- We do not accept any payments, gifts or gratuities, if this could reasonably be viewed as influencing our conclusions or advice

Independence – both actual and perceived

- We comply with the William Buck Independence policy and apply the relevant independence policies to all audit and assurance engagements to ensure the independence of William Buck, its directors and employees is maintained
- We continuously monitor our independence
- We avoid relationships that impair, or may appear to impair, our objectivity and independence

3. Working with each other

- We take responsibility to achieve the highest standards for our own work, admit to mistakes and seek to rectify adverse consequences on a timely basis
- We apply an appropriate degree of scepticism and reasonable due care in conducting our work
- We promote and encourage a collaborative and consultative culture, behaving with courtesy and consideration and in a manner conducive to the good reputation of William Buck and our professions generally
- We promote an environment that encourages sharing insights and knowledge across William Buck, and consult, as appropriate, with peers, specialists and other William Buck resources to appropriately utilise William Buck's network of knowledge and experience to ensure clients are provided with excellent service
- We deal with conflict and confrontation constructively
- We acknowledge that it is our responsibility to continue to uphold the values which underpin our profession, by abiding by the professional obligations of applicable bodies

4. Working with clients, regulators and others

- We match client needs with William Buck representatives having the requisite skills, competencies and knowledge
- We perform and document our client engagements and business operations in accordance with William Buck policies, procedures and methodologies, relevant legal and professional requirements. We adhere to client commitments without sacrificing quality
- We charge appropriate fees for our services in accordance with our engagement terms and our professional requirements
- We respect the policies and procedures of clients and others
- We deal with conflict and confrontation constructively
- We keep client information and materials confidential except as required by law or professional obligations
- We reject unethical or illegal business practices in any circumstance, and we do not work with clients and others whose standards are incompatible with either this Code or William Buck policies
- We actively work with the regulators who oversee our professional conduct
- We work with everyone in a professional and courteous manner that is conducive to the good reputation of William Buck and our professions generally

5. Respecting our knowledge and intellectual property

- We obtain, develop, and protect intellectual property in an appropriate manner
- We comply with CPD requirements of relevant professional bodies and attend training sessions provided by William Buck
- We use and share knowledge in accordance with William Buck policies and our legal and professional obligations
- We respect and protect confidential information obtained from, or related to clients or third parties, as well as personal information of our people, in accordance with our legal and professional obligations
- We take proactive measures and comply with William Buck procedures to safeguard our working papers, computers and other data devices that contain personal or confidential information