



**A|M|S**

# **Supplier Code of Conduct**

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True  
Workforce  
Dexterity

## Introduction and Purpose

The Supplier Code of Conduct (the Code) sets out values, behaviours and conduct that AMS requires all Suppliers, their employees and contractors to demonstrate. This Code applies to all Suppliers providing products and services to AMS. We also require our Suppliers to apply the principles outlined in this Code their own supply chain.

AMS identifies Suppliers, as referred to throughout the Code, to include any organisation providing products, services or personnel to AMS (including any of our subsidiaries or affiliates) and any AMS Client.

This Code is not intended to impose onerous obligations on our Suppliers. Our expectation is that our Suppliers have implemented adequate measures to comply with legal, ethical, social and environmental requirements and best practices where applicable.

The Code is intended to supplement but not replace any contractual agreement in place between AMS and Suppliers. AMS expects all Suppliers to comply with all terms and conditions set out in any contractual agreement.

The Code is divided into the following sections:

### Section 1: Compliance to Legislation

- Compliance with applicable laws
- Anti-Discrimination
- Prevention of Modern Slavery, Forced Labour & Human Trafficking
- Sanctions

### Section 2: Ethics and Standards of Conduct

- Ethical Conduct
- Diversity & Inclusion
- Global Citizenship
- Health & Safety
- Environment
- Confidentiality & Intellectual Property
- Policies
- Anti-Bribery & Corruption
- Gifts and Hospitality
- Data Privacy
- Information Security
- Resilience
- Risk Management
- Continuous Improvement

### Section 3: Misconduct and Reporting Concerns

- Conflicts of Interest
- Raising Concerns (Whistleblowing)

## Section 4: Assurance

- Supplier Assurance
- Non-Compliance to the Supplier Code of Conduct
- Conclusion

## Section 1: Compliance to Legislation

### Compliance with applicable laws

AMS operates on a global basis, so it is critically important that we understand and adhere to all applicable country-specific legislative requirements. We have policies and procedures in place to support our activity in every country in which we operate. We have a commitment to identify and implement legislative changes globally to ensure ongoing compliance.

We require that our Suppliers comply with all laws, rules, and regulations applicable to the country or countries they operate in, and where they deliver products and services to us.

This encompasses all areas outlined within this Code, including but not limited to laws which apply to: Employment, Human Rights, Health & Safety, the Environment, Anti-Bribery and Corruption, Data Protection, Fair Competition and Antitrust, etc.

### Anti-Discrimination

At AMS, it is our policy to treat everyone equally, regardless of gender, race, disability, sexual orientation, age, nationality, religion or belief, marital status, ethnic origin, political convictions, family responsibilities, gender reassignment or any protected class as defined by local law.

We take a zero-tolerance approach to any form of discrimination, harassment, or victimisation and expect our Suppliers to do the same and to raise any concerns of non-compliance in connection with products and services provided to AMS or its Clients, through appropriate channels.

We expect our Suppliers to adopt appropriate practices and procedures which support a zero-tolerance approach to discrimination and compliance with local anti-discrimination laws.

### Prevention of Modern Slavery, Forced Labour & Human Trafficking

AMS takes a zero-tolerance approach to modern slavery, forced labour and human trafficking. We support this through due diligence measures outlined in our Preventing Human Trafficking, Forced Labour and Modern Slavery Policy. Our Modern Slavery Statement is available on our corporate website and the UK government registry and is reviewed and updated annually.

We expect our Suppliers to support this approach and honour the highest standards when applicable laws and regulations differ. Suppliers may not use, or tolerate the use, of any illegal form of forced labour including child labour, trafficked, bonded, slave, indentured, or prison labour.

We expect our Suppliers to apply due diligence measures that are appropriate for both their organisation and ongoing supply chain.

## Sanctions

AMS operates on a global basis and is committed to conducting its business in compliance with all sanctions regulations imposed by the EU, UK, UN, US and where applicable, other national and supranational sanctions. We have policies and procedures in place to support our commitment.

Violation of the sanctions regulations may result in severe criminal and civil penalties being imposed on AMS and may also severely impact AMS's and our clients' reputation and commercial relationships. As such, we expect that Suppliers have appropriate due diligence in place and operate in alignment with applicable laws and regulations, including compliance with relevant sanctions regulations.

## Section 2: Ethics and Standards of Conduct

### Ethical Conduct

AMS expects all personnel to act with honesty and integrity in all activities we undertake. Acting ethically and ensuring fair treatment is of utmost importance to us.

We expect our Suppliers, and all personnel engaged by our Suppliers, to act ethically, honestly and fairly in all aspects of its business, practices, operations, and relationships.

Suppliers must not engage in bribery, embezzlement, extortion or other corrupt practices.

### Diversity, Equity & Inclusion

Diversity, equity and inclusion are integral to AMS's culture and values. As a global organisation, we recognise the importance of different perspectives and experiences in creating a more dynamic and inclusive culture, which in turn promotes innovation and creativity, yielding advantages to better serve our Clients. As such, we are committed to be an Equal Opportunity Employer and are steadfast to the principles of providing equality of opportunity in every aspect of work and the way we do business.

We believe that different is not just good, it's valuable. We want AMS to be a place where everyone can be successful, drawing upon the diversity within our workforce, in an environment that recognizes and fosters the unique cultures and communities that comprise our organisation, to drive evolution and growth and to support the communities we operate in.

We are committed to proactively taking a stand against discrimination and social injustice and have zero tolerance for any discriminatory behaviour.

We believe in fair representation of diverse employees, that is reflective of the communities in which we operate.

We expect our Suppliers to also adopt appropriate practices and procedures that promote an inclusive and respectful environment within their workforce and supply chain, and to foster equality in their operations as well as avoid unconscious bias in recruitment or promotion of their workers.

## Global Citizenship

AMS is committed to global corporate citizenship and this is central to our culture. We are accountable for our environment and our impact in the communities in which we operate; therefore, we act responsibly in all our relationships with Clients, employees, Suppliers and communities around the world.

Being responsible is essential to what we do, from mentoring underrepresented groups, to recycling and reducing waste, to raising funds for charities we support, we are committed to bringing the power of our people to the challenges impacting the environments we work in.

We expect our Suppliers to act in a similar way.

## Health & Safety

At AMS we aim to achieve the highest standards of occupational health and safety. That means going above and beyond legal compliance to ensure health and wellbeing of our people.

We are committed to maintaining our workplaces in a condition that is safe and free from hazards to health, ensuring that significant risks arising from work activities are eliminated or adequately controlled, and preventing accidents and cases of work-related ill health.

We expect all Suppliers to provide their personnel with a healthy and safe workplace, in compliance with all applicable health and safety laws and regulations in the countries in which they operate.

Suppliers should identify and assess any potential risks in the workplace and develop and implement appropriate plans and processes to mitigate any risk or harm to life and property.

Suppliers should provide their personnel with the necessary training to ensure their safety.

Suppliers must maintain records documenting workplace injury, illness, and safety training and implement procedures that encourage worker reporting.

## Sustainability & The Environment

At AMS, we are proud of the comprehensive approach we take to sustainability and the environment, our impact on society, global corporate citizenship, and governance.

Across AMS, we focus our activities on the six [United Nations Sustainable Development Goals](#) where we believe we can have most impact: gender equality; reduced inequalities; decent work and economic growth; good health and wellbeing; affordable and clean energy and climate action.

We recognise that as a global company, our activities have an impact on the environment. As a service provider, these activities mainly relate to our use of energy and the resulting greenhouse gas emissions, the waste we produce and natural resources we consume. In addition, we ensure we have a fair representation of diverse employees that are reflective of the communities in which we operate. We give a voice to our diverse employees and listen to their perspectives. We also have a positive impact on the environment through our relationships with responsible Suppliers and Clients who share our views and aspirations.

We pride ourselves on being a responsible organisation and have pledged to continually improving our environmental performance and preventing pollution. We support and comply with all environmental legislation and advocate a precautionary approach regarding environmental concerns. We have made a commitment to be UK Carbon Negative by 2025 and are working towards a global, companywide carbon reduction plan.

We expect our Suppliers to comply with all applicable local and national laws and regulations relating to the protection of the environment, in all countries of operation and we encourage our Suppliers to adopt science-based carbon reduction targets. Business operations should be managed in a responsible and sustainable manner and any negative impact on the environment should be continuously reduced.

### **Confidentiality & Intellectual Property**

AMS will from time to time entrust Suppliers with information of a sensitive or confidential nature. Confidential information takes many forms and we expect Suppliers to apply the below principles:

- respect the confidential nature of the information,
- protect AMS, our people and our Clients, and;
- act in accordance with all contractual agreements Suppliers have in place with us.

We are committed to protect our intellectual property, whether by copyright, patents, trademarks, confidentiality or other forms of protection in all countries we do business. We also ensure that we use intellectual property of other business, including our Clients' and Suppliers', only in the way we are authorised to.

We expect all Suppliers to respect and adequately protect our intellectual property rights and comply with any agreements they have with us about the use of our intellectual property.

Any misuse or inappropriate sharing of confidential information will be taken very seriously and could result in termination of your contract or agreement to supply products or services to AMS.

### **Policies**

AMS's guidelines and rules, set out in our policies, are intended to ensure we operate in a fair and ethical way and in compliance with all local laws and regulations. Our policies include but are not limited to the following:

- Prevention of Fraud, Bribery and Corruption
- Preventing Human Trafficking, Forced Labour and Modern Slavery
- Sanctions
- Data Protection, Retention, and Classification
- Information Security
- Environment
- Procurement & Supply Management
- Expenses
- Global Travel
- Health & Safety

We expect our Suppliers to have policies and procedures in place that are appropriate for the business they are operating, the jurisdiction where they operate from and relevant to the services being provided to us and/or our Clients.

## Anti-Bribery & Corruption

It is policy and standard practice at AMS to maintain the highest level of ethical standards in the conduct of our business affairs and to this end we have a zero tolerance towards any act of bribery or corruption, and we have robust controls in place to prevent bribery.

We will uphold all laws relevant to thwarting bribery and corruption in all jurisdictions in which we operate and expect all Suppliers to do the same.

We deem it unacceptable for any personnel working for or on behalf of the company to engage in any act of bribery (giving or receiving).

We expect that Suppliers never engage in any kind of bribery or kickbacks, including promising, offering, providing, or authorising anything of value to a government official or political entity to gain an unfair business advantage or receiving any of the same.

Under no circumstances should a Supplier seek to influence AMS or AMS's Client personnel with any act of bribery.

We expect all Suppliers to prevent, detect and report any cases of bribery and corruption as appropriate.

Suppliers are expected to comply with all applicable foreign and domestic anti-corruption laws and that the same is enforced within their supply chain.

## Gifts & Hospitality

AMS is committed to maintain the highest level of ethical standards in the conduct of our business affairs. We expect excellent standards of conduct from everyone which includes being open and transparent about gifts and hospitality whether provided or received. We do not engage in bribery or corrupt behaviour, nor do we provide or authorise improper benefits or payments. We are fully committed to only receive or offer gifts, hospitality or other items of value that avoid the impression of undue influence or the appearance of inappropriate behaviour. Our business decisions are never influenced by gifts, hospitality or improper benefits.

In addition, it is our obligation to "know our partners" and to ensure that any third parties with and through whom we conduct business acknowledge and agree to comply with these principles.

Suppliers must not offer or accept anything of value from business partners to obtain unfair business advantages. Any gifts or entertainment must comply with applicable laws and regulations and must not violate AMS's policies on the matter.

## Data Privacy

Whether you are processing data on behalf of AMS, or on behalf of one or more of our Clients, or you are operating independently of our instruction as a data controller, we expect all Suppliers and business partners to comply with all applicable privacy legislation appropriate to their business and jurisdiction they operate in.

We expect all Suppliers to commit to deliver a compliant service, to work alongside AMS and/or our Clients to ensure that the interests of the people whose data they are entrusted with are protected and that the principles of any applicable data protection regulations are met in the delivery of their product or service. We expect that Suppliers:

- collect the minimum data needed,
- keep data accurate and up to date,

- only use data for what it was volunteered,
- keep data for no longer than necessary, removing via secure disposal,
- are fair, lawful, and transparent with how data is processed, whoever it belongs to,
- are accountable for privacy, and able to demonstrate a compliant approach,
- maintain integrity and confidentiality of personal data.

In the event of a data breach being identified in connection with the services provided to us and/or our Clients, we expect all Suppliers to inform us as soon as is practicably possible. This can be done by emailing the AMS Privacy Office at [dataprotection@weareams.com](mailto:dataprotection@weareams.com).

## Information Security

It is policy and standard practice at AMS that information assets are protected from all types of threats, whether internal or external, deliberate or accidental, such that:

- confidentiality of information shall be maintained,
- integrity of information shall be relied upon,
- information shall be available when the business needs it,
- all statutory, regulatory and contractual obligations shall be met.

We expect our Suppliers, business partners and sub-contractors that store, transmit, use, process, interface or destroy any confidential data on AMS's behalf to adopt an information security framework or management system for identifying information security risks and ensuring appropriate level of protection.

This shall be achieved by implementing a set of policies, procedures and/or controls (appropriate for the services provided) to address technical and organisational security and provide adequate logging and monitoring capabilities as well as appropriate means for identifying, reporting and managing any information security incidents.

The effectiveness of the framework shall be routinely reviewed and assessed by senior management to ensure its on-going suitability and adherence with best industry standards.

## Resilience

Our Clients depend on solutions provided by AMS globally and we recognise risks associated with business disruptions and the importance of providing a viable capability to anticipate, identify, manage and withstand major business disruption events that may prevent our business from functioning.

It is our policy and commitment to take all necessary actions to prevent major business disruption occurrence, maintain and continually improve our business continuity and disaster recovery management systems to ensure AMS's Clients remain confident in our ability to handle disruptions.

We expect our Suppliers and their ongoing supply chain to have appropriate arrangements in place to enable a timely recovery to the agreed service levels when disruptive events occur in order to provide assurance that they remain operationally resilient through periods of disruption and continuity of product or service delivery to AMS.

## Risk Management

AMS recognises that to maintain a successful business there are risks, however, risks should never be greater than the business can withstand. We operate a global framework for managing risk effectively and consistently, with the appropriate degree of effort and is committed to promoting a risk awareness culture throughout our organisation.

We expect our Suppliers to establish and maintain processes and/or procedures for identifying risks in all areas addressed within this Code, including but not limited to the environmental, health & safety, data and information security, and ethical risks associated with their operations and have appropriate policies, procedures and/or controls to manage such risks and ensure ongoing compliance.

### **Continuous Improvement**

At AMS, we exercise our skills, expertise, diligence and best industry practice in order to provide our Clients with the best products and services possible. We recognise that in order to maintain a successful and competitive business we need to continually improve to bring value to our Clients.

We expect our Suppliers to continuously improve their products and services provided to AMS and our Clients through innovation, expertise, following the best industry practice and focusing on enhancing the activities that generate the most value to AMS and our Clients.

## **Section 3: Misconduct & Reporting Concerns**

### **Conflicts of Interest**

All individuals working in partnership with or providing products or services to AMS are always expected to operate with best interests of AMS in mind.

Suppliers may not engage in any activities that would create an actual or potential conflict of interest regarding their duties, interests, and obligations to AMS and our Clients. We expect our Suppliers to immediately notify us if any conflicts of interest arise.

### **Raising Concerns (Whistleblowing)**

AMS expects all Suppliers to raise any concerns, around behaviour or activity that has occurred, might have occurred, or has a strong possibility of occurring in the future that is contradictory to this Code, that is relevant to or is in connection with products or services provided to us and our Clients.

Suppliers can raise concerns to us using one of the following options which are accessible from the [weareams.com](http://weareams.com) landing page:

1. Raise your concern in writing on [www.AMSRaiseYourConcern.com](http://www.AMSRaiseYourConcern.com) - the information Suppliers provide will be treated in a confidential manner unless they provide contact details.
2. Raise your concern via telephone; Suppliers can locate the local number from the drop-down list on [www.AMSRaiseYourConcern.com](http://www.AMSRaiseYourConcern.com). The hotline is operated by an independent third party; a specially trained representative will listen to concerns raised by Suppliers, ask a few questions, and review the information to ensure it is accurate.

Once a Supplier has raised a concern, the details will be reviewed by a member of our Risk & Compliance team and referred to a Subject Matter Expert (SME) as appropriate. The SME will investigate the situation and ensure appropriate action is taken. Suppliers may be contacted during this investigation process and asked for further detail if this happens. We expect Suppliers to co-operate promptly with these requests. Suppliers will be notified when the concern has been fully investigated and closed, and, if appropriate, the details of the resolution will be shared.

Suppliers are expected to create and maintain a whistleblowing channel for their own personnel and business partners to report workplace complaints (as appropriate to their organisation). Suppliers

must protect the whistleblower's confidentiality, prohibit retaliation and adhere to whistleblowing requirements as applicable based on local legislation or regulations.

## Section 4: Assurance

### Supplier Assurance

AMS's Global Risk & Compliance function provides assurance in all areas outlined in this Code. We expect all Suppliers to carry out their own assurance and audit activities in line with this Code and as appropriate for their business and supply chain.

### Non-Compliance to the Code

Part of conducting business with AMS includes a requirement to comply with this Code.

We encourage our Suppliers to engage with us so we can support you in any areas to which you believe you will have a challenge complying.

If it is determined that a Supplier does not adhere to the Code, they must correct their actions to ensure compliance with the requirements outlined in this document.

Ultimately, we have the right to terminate business with a Supplier who fails to adhere to the Code in whole or in part.

### In Conclusion

AMS expects all Suppliers to conduct day-to-day practices in line with this Code. We may conduct follow up compliance surveys and audits to confirm compliance with this Code. We also expect our Suppliers to hold their supply chain and subcontractors to the standards and practices covered in this Code.

Should you have any questions about this Code, please contact [3rdPartyAssurance@weareams.com](mailto:3rdPartyAssurance@weareams.com)