

Ethical Business Policies

At AMS, we value our reputation for reliability, integrity, and ethical and legally compliant business practices in all countries we operate in. We have a responsibility to our clients, partners, communities, and ourselves to conduct our business with the highest level of integrity and ethics.

To support these commitments, AMS operates a range of policies that guide our colleagues to better understand our values, the behaviour that is expected of us, and the way we do business. They are designed to provide a reference of standards in delivering our services to clients and to ensure compliance with applicable legislative and regulatory requirements.

Global Code of Conduct

Our Global Code of Conduct (the 'Code') sets out the values, behaviours, and basic standards of ethical business conduct that individuals working for, or associated with us, are expected to demonstrate in their roles both at work, and in any situation where they are acting as representatives of AMS. To put it simply, our Code is a guide for both how to behave appropriately and how to make decisions at work. It is the cornerstone of our policies.

Our Code applies to all individuals working for, or associated with AMS, or any of our subsidiaries, at all levels and locations. Where applicable, any third-party suppliers are also expected to adhere to the principles set out in the Code.

AMS expects every member of staff to use good judgement to decide the most appropriate way to conduct themselves. Our people managers are responsible for ensuring their team members understand and comply with all aspects of the AMS culture, the Code, and associated policies. To support our colleagues, AMS Risk & Compliance run an annual Compliance Programme comprised of scheduled policy refreshers and attestations, internal audits, and facilitating assessment against our Safeguard Standards.

Our Code requires all our staff to call out behaviours and activities that contradict our values and requirements set in the Code, and associated policies. They can do so by raising concerns about any issue or suspicion of malpractice with their Line Managers, by contacting AMS Risk & Compliance or raising concern confidentially via our Raise Your Concern channels. Our promise to all those who raise concerns in good faith is that they will not suffer any ill treatment, retaliation, or detriment to their career or wellbeing at AMS, even if they turn out to be mistaken.

Our commitment to the highest standards of ethics and integrity is realised by embedding the following principles in everything we do:

- We expect all AMS staff to follow the standards, rules and procedures contained in our policies at all times to ensure compliance with our values, standards and local laws and regulations.

- We take a zero-tolerance approach to any form of discrimination, harassment, or victimisation. It is our commitment to treat workers, candidates, and anyone with whom we do business, fairly, equally and without discrimination.
- We are committed to hire inclusively and give greater support to under-represented groups, build and nurture a culture of inclusiveness and support our leaders to inspire, include, and call out behaviours that do not support our Diversity Equity & Inclusion promises or AMS values.
- We are committed to maintaining the highest standards of occupational health and safety. That means going above and beyond legal compliance to ensure the health and wellbeing of our people and anyone else impacted by our business.
- We value employee information as much as that of our partners, candidates, and any third parties. We practice the same kind of due diligence in handling personal information and ensure that we collect the minimum data needed (and only where there is a legitimate interest to hold it), we keep data accurate and up to date, we only use it for the purpose for which it was volunteered, we keep it for no longer than is absolutely necessary, removing it via secure disposal and we're fair, lawful, and transparent with how we process data, whoever it belongs to.
- We are committed to the ethical use of personal data, ensuring that our activities do no harm to either an individual or the wider population, that our use of personal data is free from bias, and that we seek opportunities to make a positive difference to the lives of the people to which we interact.
- We respect the confidential nature of the information we've been entrusted with, protect the confidentiality of AMS, our people, and our clients, and always act in accordance with our Information Security Policy and Data Protection Policy.
- We expect all individuals working for, or in partnership with AMS, to operate with the best interest of AMS in mind. Therefore, we require any potential conflicts of interest to be declared by the individuals to their Line Manager who will seek further advice to ensure that this is managed appropriately.
- We expect all staff to adhere to our social media guidelines when using social media for business purposes and report offensive, abusive, or otherwise inappropriate social media content.
- We are committed to protect AMS, our colleagues, clients, business partners and communities we operate in by calling out behaviours and activities that violate our values, our Code and associated policies. We expect all staff to promptly report any actual and potential breaches of the Code and associated AMS policies and are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that an actual or potential breach has taken place or may take place in the future.

Prevention of Fraud, Bribery and Corruption

The fight against acts of fraud, bribery and corruption is endorsed and supported at the most senior level within AMS. We recognise that over and above any financial damage suffered, fraud, bribery and corruption may reflect adversely on our reputation and run counter to AMS's corporate culture. As such, we have a zero-tolerance attitude to criminal breaches of business practices within our business and our supply chain and will report them to the appropriate law enforcement authorities.

To demonstrate our commitment to preventing fraud, bribery and corruption, money laundering, terrorist financing, tax evasion and improper conduct (further referred to as prohibited acts) including when receiving or giving gifts or any forms of hospitality, AMS operates a Global Policy on Prevention of Fraud, Bribery and Corruption. Most importantly, it is to ensure AMS's compliance with all laws and regulations addressing bribery and corruption in countries we provide services in, including but not limited to, the U.S. Foreign Corrupt Practices Act of 1977, as amended (the "FCPA"), the U.S. Travel Act, the U.S. Domestic Bribery Statute, the UK Bribery Act 2010, the Philippine Republic Act No. 3019 (The Anti-Graft and Corrupt Practices Act) and local Criminal and Penal Codes.

We are committed to maintaining the highest level of ethical standards in the conduct of our business affairs by establishing and promoting a corporate culture where we prevent, detect and report all prohibited acts associated with any activities.

At AMS we reduce opportunities for these acts to occur by:

- Never engaging in corrupt or illegal behaviour nor providing or authorising improper benefits or payments.
- Always complying with all applicable anti-money laundering and terrorist financing laws, rules and regulations and fully supporting our clients who have anti-money laundering and terrorist financing policies in place.
- Defining, setting, and maintaining effective control procedures to identify and deter prohibited acts and ensuring these processes are followed without exception, to protect our business against these prohibited acts, including intentional and unintentional financial crime, money laundering and terrorist financing activities. These are in place across our Finance, Supplier Management and Payment processes, where the exposure to potential money laundering or terrorist financing risk is the highest.
- Ensuring our assets, which includes our people, are used only for legitimate purposes.
- Only receiving or offering gifts, hospitality or other items of value that avoid the impression of undue influence or the appearance of inappropriate behaviour.
- Ensuring our business decisions are never influenced by gifts, hospitality, or improper benefits from third parties.
- Rigorously investigating all incidences of suspected corruption or illegal behaviour or activities and all instances of major control breakdowns.
- Taking firm and vigorous action against any individual or group involved in any act of bribery and corruption or perpetrating fraud against AMS, its shareholders or its customers.
- Seeking restitution of any assets fraudulently obtained and the recovery of costs.
- Assisting the police and other appropriate authorities in the investigation and prosecution of those suspected of these acts.
- Raising awareness of these acts within AMS staff at all levels.
- Ensuring any reported conflict of interest which may detract from the effectiveness and objectivity of one's duties as an employee of AMS is thoroughly investigated with appropriate actions taken to eliminate it.
- Encouraging AMS staff to be vigilant and to report any suspicion of these acts without fear of disclosure or retribution and providing them with suitable disclosure channels.
- Ensuring key controls are operating effectively.

- Knowing our business partners and ensuring that any third parties with and through whom AMS conducts business, acknowledge, and agree to comply with the principles of our Prevention of Fraud, Bribery and Corruption Policy, as stated in the Supplier Code of Conduct and assessed via AMS's 3rd Party Assurance Programme.

To effectively combat prohibited acts, AMS has implemented detection and prevention processes, risk management strategies and controls which require the following:

- All AMS staff are expected to read and understand our policy and be able to detect actual or suspected prohibited acts as described in the policy.
- Mandatory training on Prevention of Fraud, Bribery and Corruption must be undertaken by all AMS staff upon joining AMS and is repeated on an annual basis.
- Risk of fraud, bribery and corruption shall be assessed regularly as part of the business's risk management process at the account, function, and corporate levels, and at the design stage of new systems and processes followed by the implementation of appropriate controls.
- AMS is legally required to keep accurate records that truthfully and accurately reflect all monetary transactions, expenses, and its assets.
- AMS must maintain an adequate system of internal accounting controls with records being reasonably detailed to alert a reviewer as to the nature of the transaction.
- All accounts, invoices, memos and other documents and records relating to dealings with third parties, such as clients, suppliers, and business partners, should be prepared and maintained with strict accuracy and completeness and in line with the locally prescribed minimum standards.
- All investigations related to actual or suspected prohibited acts are conducted thoroughly objectively, confidentially, and independently of the line management for the area in which such illegal activities have occurred or are suspected.
- AMS shall seek to prosecute anyone who commits any prohibited acts and will seek to recover its assets through legal means.



- AMS is committed to reporting all known criminal activity and other breaches discovered during internal investigations to law enforcement for their investigation.
- Under no circumstance shall any AMS staff give, pay, offer, promise to pay, or authorise the giving or payment of money or anything of value directly or indirectly to any government official to obtain or keep business or to secure some other improper advantage.
- Facilitation and kickback payments are not permitted under the policy regardless of them being a commonplace in some countries.
- To ensure that the requirements of this policy, as well as AMS's expectations outlined in the Supplier Code of Conduct, are met in relation to third-parties, AMS staff responsible for the engagement of third-party suppliers are required to conduct due diligence on these parties, including but not limited to pre-engagement checks and execution of anti-fraud, bribery and corruption contractual provisions appropriate for the particular business transaction, and post-engagement or post-deal due diligence and monitoring where applicable.
- AMS reserves its right to terminate a contractual relationship with third-party suppliers if they breach this policy, or any of the requirements set in the Supplier Code of Conduct.
- AMS staff must not make contributions to political parties on behalf of AMS.
- AMS's charities of choice and charities which AMS has had a previous relationship with, should be considered in the first place when making charitable donations. When making charitable contributions, either domestically or globally, to other charities, a relevant Head of Function is responsible for approving on behalf of AMS and should consider appropriate anti-corruption compliance procedures under applicable anti-bribery laws to ensure the contribution is used for the intended charitable purpose. Any donation should be carried out in an open and transparent fashion, be based on fair and objective criteria, be accurately and completely documented, and be consistent in all respects with the principles of our Code and this policy.
- AMS's participation in bidding processes must take place according to the established guidelines and procedures. All purchasing and contracting processes at AMS should remove any opportunity for staff to improperly steer the award of a contract to a particular bidder. For high-value contracts, AMS must apply a consistent and systematic review procedure to demonstrate the process is free from acts of bribery and corruption.
- While the policy is not intended to prohibit the offer or receipt of nominal gifts, meals, invitations to events or functions in connection with matters related to the business provided they are appropriate and proportionate (as per thresholds set in the policy), before offering or receiving any gift or hospitality, all AMS staff is expected to check if it is in accordance with this policy.
- AMS staff must declare all offers or receipt of any gifts and/or hospitality to the designated person assigned by the Client Directors/Head of Departments or Senior Managers. A written record of all gifts and/or hospitality offered or accepted must be kept, as defined by account or function, including approvals and other supporting documents, all of which should be retained for audit purposes and in line with AMS's Data Retention Policy.
- AMS staff must ensure all expense claims relating to hospitality, gifts or expenses incurred to third-parties are submitted in accordance with AMS's Expenses Policy and specifically record the reason for the expenditure.



Prevention of Human Trafficking, Forced Labour and Modern Slavery

At AMS, we recognise that we have a significant role to play in the prevention of human trafficking, forced labour and modern slavery by managing our business carefully and responsibly. As such, we take a zero-tolerance approach to any form of modern slavery.

As a UK head-quartered business, we operate a Global Policy on Prevention of Human Trafficking, Forced Labour and Modern Slavery in direct response to the UK's Modern Slavery Act UK 2015 however, we apply this policy globally because AMS is committed to acting responsibly in all relationships with clients, employees, and communities around the world. Acting with integrity is fundamental to the values and behaviours set out in our Code.

To demonstrate our commitment to the prevention of modern slavery, our [anti-slavery and human trafficking statement](#) is available on our corporate website.

Our commitment to the prevention of modern slavery is also realised by:

- Adherence to local and national laws.
- Freedom of workers to terminate employment.
- Freedom of movement.
- Freedom of association.
- Prohibiting any threat of violence, harassment, and intimidation.
- Prohibiting the use of worker-paid recruitment fees.
- Prohibiting compulsory overtime.
- Prohibiting child labour.
- Prohibiting discrimination.
- Prohibiting confiscation of workers original identification documents.
- Providing access to remedy, compensation, and justice for victims of modern slavery.
- Aligning our policies, standards and procedures to the Dhaka Principles¹ to ensure rights of all AMS staff, including migrant workers, are respected, from the moment of recruitment and during the employment with us at all times.

¹ Institute for Human Rights and Business, <https://www.ihrb.org/dhaka-principles>

We expect every member of staff to be aware of the characteristics of modern slavery in all their interactions whilst working for AMS and expect everyone to raise concerns of suspected or actual breaches of the policy. We are committed to zero-tolerance to any form of retaliation to individuals who raise concerns in good faith even if they turn out to be mistaken. and raise any concerns.

We achieve our responsibilities to prevent modern slavery through conducting our operations in accordance with set principles, procedures, and policies as well as having appropriate governance and controls in place.

We take the following steps to ensure our processes and practices are appropriate and mitigate the risk of any opportunity for modern slavery occurring:

- We do not retain original IDs or visa documents of AMS staff or individuals we supply to our clients (e.g. a physical passport rather than a photocopy).
- AMS staff and individuals we supply to our clients have a clear written contract, which sets out the terms and conditions of the employment relationship, including the notice period for bringing the contract to an end. These clear terms enable AMS staff and individuals we supply to our clients to exit the contract with AMS should they wish.
- In all of our locations, we operate in accordance with relevant country legislation regarding working time and rest breaks; working hours are contractually agreed with all AMS staff and individuals we supply to our clients and we do not prevent AMS staff or individuals we supply to our clients from taking appropriate breaks during a shift.
- We financially compensate AMS staff and individuals we supply to our clients fairly and always in line with relevant legislation. We have procedures and controls in place to ensure minimum wage requirements in all jurisdictions we operate are always met and utilise rate calculators configured to warrant the same.
- For the individuals we supply to our clients, we have procedures and controls in place to ensure that all temporary workers do not commence an assignment with one of our clients until a signed contract has been returned to us and required pre-engagement checks have been completed to a pre-defined standard.
- All AMS staff, individuals we supply to our clients and our suppliers have access to a hotline number and website to confidentially raise concerns about any actual or suspected activity that contravenes our Code (including our zero-tolerance approach to modern slavery).
- We have a portfolio of policies to govern the way we operate by ensuring that all AMS staff are treated fairly when it comes to both work and personal matters.
- We expect all our suppliers to comply with all applicable laws and regulations, including those related to the prevention of modern slavery, our Supplier Code of Conduct and flow down responsibilities contractually and make compliance with said laws and regulations a pre-requisite to signing up suppliers.
- We conduct due diligence checks on new third-party suppliers before entering a contractual relationship with them which include questions specifically regarding the prevention of modern slavery.
- In the event that a red-flag response is received to these due diligence questions we have defined procedures that facilitate further investigation and risk-based decisions on whether to proceed with the engagement of that supplier.
- Mandatory training on Prevention of Human Trafficking, Forced Labour and Modern Slavery must be undertaken by all AMS staff upon joining AMS and is repeated on an annual basis.
- AMS fully cooperates with authorities reporting any breaches of the UK Modern Slavery Act and foreign equivalent legislation and supports investigations.

AMS recognises that modern slavery is a global issue and that we have a corporate social responsibility to prevent its occurrence wherever possible. Acting ethically is always of upmost importance to us and we continue to monitor relevant legislation within all countries in which we operate to ensure these principles guide our business.

Sanctions Compliance

As a global organisation, AMS may be subject to sanctions regulations. These are restrictions on transactions involving certain products or services with targeted countries, entities or individuals imposed by international organisations, individual countries or a group of countries. Violation of sanctions regulations may severely impact AMS's and our clients' reputation and commercial relationships as well as result in serious criminal and civil penalties being imposed on AMS.

We are committed to not do business in sanctions restricted countries or with any person or entity located or incorporated thereunder in a manner that would be in breach of any applicable sanctions or export control laws and regulations. AMS is also committed to investigate and report to the relevant authorities in a timely manner any suspicious activity or potential sanctions violations. We will engage, cooperate, and communicate with competent authorities and law enforcement agencies to ensure compliance with all sanctions regulations recognised in this policy.

We take the following steps to ensure our processes and practices are appropriate and mitigate the risk of breaching any sanctions regimes:

- Ensuring that AMS staff responsible for signing up new clients and new client implementations adhere to principles and standards of conduct as outlined in our Global Sanctions Policy before AMS undertakes any work for or on behalf of the client, and before AMS receives or transfers any funds to/from or on behalf of the client.
- Ensuring that AMS staff responsible for the relationship with suppliers only engage them after they have successfully completed all 3rd Party Assurance due diligence checks, which include international sanctions check.
- To the extent permissible by law, ensuring that AMS staff and relevant departments responsible for recruitment directly into AMS must ensure sanctions restrictions are considered before any hiring decision is made.

