

A|M|S

People powered partnership

Ethical Business Policies



We are AMS.

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 all employees to better understand our values, behaviours, responsibilities, and standards of ethical business conduct that all AMS employees are expected to demonstrate in their roles both at work and in any situation where they act as representatives of AMS. 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

AMS is shaped on the values of being Authentic, Passionate, and Bold. These values guide the way we do business, by defining how we treat our clients, our candidates, our partners, our communities, and each other. They connect us together, in an organisation that brings diverse talents across industries, geographies, and cultures.

The Global Code of Conduct (the 'Code') is a framework that guides all our colleagues to better understand our values, the behaviour that is expected of us, and the way we do business. It is designed to provide a reference of standards in delivering our services to clients and candidates, whilst being compliant with applicable legislative and regulatory requirements.

Our Code and all associated policies, apply to all colleagues working for, or associated with AMS or any of our subsidiaries, at all levels and locations. The principles of ethical behaviour and our expectations towards third-party suppliers are reflected in our Supplier Code of Conduct.

AMS expects every employee 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 employees, AMS's Risk & Compliance run an annual Compliance Programme comprised of scheduled policy refreshers and attestations, internal audits, and facilitating assessment against our Account Governance Standards.

Compliance with laws and regulations

As a global talent acquisition business we recognise that it is critical to our success to understand relevant country specific legislation and ensure it is followed at all times. We are committed to conducting our business activities with honesty and integrity and in full compliance with all

applicable laws, rules, and regulations in all countries where we operate to build trust with our stakeholders and to avoid damage to our reputation and financial standing.

Our policies and employee handbooks support our commitment to operate in fair and ethical ways and in compliance with all local laws and regulations. They are designed to ensure that we operate within the bounds of the law and to protect against risks that could harm our business, reputation, or stakeholders. Guidelines, procedures, rules, and standards of conduct set out in our policies and handbooks are to ensure we consistently operate in that manner.

Sustainability (ESG)

ESG is the umbrella for Sustainability. Monitoring and continuously improving an organisation's environmental and social impacts along with ensuring good corporate governance helps it safeguard its business from future risks. It facilitates long term growth for our business, reduces costs, attracts future talent, and provides assurance for our existing and future clients.

We focus our activities on the six United Nations Sustainable Development Goals where we believe we can have most impact, specifically, gender equality, reduced inequalities, decent work and economic growth, good health and wellbeing, affordable and clean energy, and climate action.

Our commitment for the '*Environmental*' pillar is to be Carbon Neutral by 2025 and Carbon Net Zero by 2050, our '*Social*' pillar centres on gender equality, reduced inequalities and good health and wellbeing, and we deliver our '*Governance*' commitments through operating a corporate governance framework underpinned by internal practices and policies that lead to effective decision making and legal compliance.

Respecting human rights

As a global business interacting with people around the world, we are committed to respect human rights of all our colleagues, clients, candidates, suppliers and everyone else who interacts with AMS. We strongly believe that everyone deserves to be treated with dignity and respect and recognise that we have a significant role to play in upholding internationally recognised human rights.

We are also committed to use all reasonable efforts to prevent child labour, human trafficking, forced labour and any form of modern slavery by managing our business carefully and responsibly and by avoiding any actions that may contribute to adverse human rights impacts. As such, we take a zero-tolerance approach to any form of modern slavery.

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.

Prevention of fraud, bribery and corruption

At AMS, we value our reputation for reliability, integrity, and ethical and legally compliant business practices in all countries we operate in. We recognise that over and above any financial damage suffered, fraud, bribery and corruption may reflect adversely on our reputation and run counter to our values and corporate culture. As such, the fight against any acts of fraud, bribery and corruption is endorsed and supported at the most senior level within AMS.

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.

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 acts of fraud, bribery and corruption.

Fight against money laundering and tax evasion

It's an essential part of running our business and a legal requirement to keep accurate records that truthfully and accurately reflect all monetary transactions, including our income and cost data. As global corporate citizens we are committed to always respect local tax rules and maintain transparent, accurate and reliable financial records that comply with local and international financial reporting rules.

We are also committed to operating appropriate controls to ensure none of our activities constitute tax evasion or are used to launder money from criminal activity.

Gifts and hospitality

Exchange of modest gifts and hospitality is a common and important way of building and improving working relationships with business partners. However, when the ultimate purpose of gifts or hospitality is to influence a person to do, or not do something in violation of their legal, contractual or professional obligations, this may constitute bribery.

We are fully committed to only receive and 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.

Sanctions compliance

The global nature of our business, and because sanctions apply across borders, means the transactions or activities AMS engages in may be subject to sanctions. 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.

Fair competition

Competition and anti-trust laws and regulations ensure fair play in business by preventing businesses from abusing their dominant market position, entering into anti-competitive agreements, making false statements that unfairly discredit competitors, or improperly interfere with a competitor's business relationships. Breaches of competition laws can lead to significant fines, criminal liability and other sanctions.

At AMS, we are committed to acting ethically, transparently, fairly and in compliance with all competition and anti-trust laws and regulations in competing for customers and doing business with our suppliers. It is responsibility of all employees that they do not engage or involve AMS in any illegal practices that lead to breach of said laws.

Equal opportunities and non-discrimination

AMS is a diverse company operating across many sectors, geographies, and the talent spectrum, from graduates to executives. Our employees come from a rich mixture of backgrounds, nationalities, languages, religions, ages and cultures and we embrace equality of opportunity.

We do not tolerate any form of discrimination, harassment or victimisation and we are committed to treat all colleagues, candidates, clients, suppliers and anyone else who we interact with fairly, equally and without discrimination, irrespective of age, family responsibilities, disability, gender, including gender identity, gender expression, gender reassignment, HIV/AIDS status, marital status including civil partnerships, neurodiversity, pregnancy or maternity, political opinion, race/ethnicity/caste, religion or belief, sex, sexual orientation, socio-economic background, spent convictions, trade union membership, work patterns, or any other non-merit characteristics or other classification protected by law.

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.

Harassment, bullying and victimisation

At AMS we believe that everyone has the right to dignity and respect and in line with respective laws and regulations and our zero-tolerance approach to any form of harassment, we strictly prohibit any acts of harassment, including sexual harassment, bullying and victimisation in the workplace and other work-related settings.

Any employee who is found to have engaged in such unacceptable behaviour will face disciplinary action, including dismissal, and potentially legal action.

Diversity, equity, inclusion and belonging (DEIB)

At AMS, Diversity, Equity, Inclusion, and Belonging (DEIB) are at the very core of who we are. These principles are not just part of our strategy—they are integral to our culture and how we innovate every day.

Our commitment to fostering an inclusive environment is resolute, and we are dedicated to making sustainable efforts that ensure diversity is not only reflected in our teams but is deeply embedded in how we work and collaborate.

We are hugely passionate and committed to addressing systemic barriers for underrepresented groups to enable inclusion for all. Our mission is to drive business strategy and success through diverse representation and equitable outcomes. We strive to build a culture of allyship, supporting our leaders to inspire, include, and call out behaviours that do not support our AMS values.

Health and 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 the health and wellbeing of our people and anyone else impacted by our business.

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. By effectively managing health and safety risks, we can minimise impacts caused by injuries at work and significantly reduce the disruption to our business caused by absences from work.

It is everyone's responsibility to take all reasonable care for the health and safety of ourselves and any others who may be affected by our acts.

Working conditions

At AMS, we recognise that working conditions play a crucial role in employee wellbeing, productivity, and overall job satisfaction. Working conditions encompass everything from physical safety, remuneration & fair wages, working hours & work-life balance, inclusion, social benefits and mental health support. We are committed to maintaining high standards in these areas, ensuring a safe, fair, and supportive workplace for all employees.

This means ensuring compliance with legal requirements, promoting wellbeing, and continuously improving workplace conditions. Our approach includes setting clear objectives and measurable targets to drive continuous improvement and accountability.

Social dialogue

At AMS we believe that open and meaningful dialogue between employees and leadership is essential for a positive, inclusive, and high-performing workplace. Social dialogue includes formal and informal ways for employees to voice concerns, share feedback, and contribute to decision-making.

While trade unions and collective bargaining agreements may not be common in all the countries where we operate, we are committed to fostering engagement and acting in accordance with local legislation where required. Through structured employee forums, regular leadership communication, and dedicated feedback channels, we ensure that every voice matters.

Handling personal information

We respect the privacy of all individuals we work with, including our colleagues, clients, candidates, suppliers, and everyone else who interacts with AMS. We are committed to deliver market leading privacy management and to achieve this, we have developed policies and internal rules regarding use of personal data, and we are committed to observe and comply with all applicable laws and regulations in every country we do business in whenever collecting, using, maintaining, disclosing, or disposing of personal data.

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.

Information security

At AMS, we recognise the utmost importance that information security has in achieving our success and maintaining trust of our colleagues, clients, candidates, and business partners. We understand that the information we process needs to be protected from a variety of threats inherently connected to business operations, use of Information and Communications Technology and presence in the cyberspace.

We are committed to ensuring availability, integrity and confidentiality of our information and our information systems. To support this commitment, we have established policies and procedures designed to reduce the security risk to our information assets.

Confidentiality and intellectual property

Information, technology, designs, ideas, and inventions are valuable corporate assets that differentiate businesses from their competitors. We recognise that value at AMS and are committed to safeguard our confidential and proprietary information, that is, any important and valuable information such as know-how, trade secrets, financial information, or corporate strategy that has not been disclosed to the general public and will do the same for the confidential information that our clients, suppliers and business partners entrust to us.

We will also protect AMS's intellectual property rights from designs and trademarks to trade secrets and copyrights and will always respect the rights of others.

Conflict of interest

At AMS, we recognise the importance of fairness and objectivity in the way we conduct our business. We all must commit ourselves to ethical and professional conduct and we all have a duty to act in the best interest of AMS. As such, we must avoid any situations where our personal interests conflict with the interests of AMS which in turn could lead to personal gain to the detriment of AMS or negatively impact one's ability to make clear and objective decisions for AMS.

Because the existence of a conflict of interest may be detrimental to our business and clients we serve, and to protect impartial decision making, all conflicts of interest and appearances of conflicts of interest must go through the disclosure and resolution process.

Our approach to Artificial Intelligence

At AMS, our commitment to Artificial Intelligence (AI) is rooted in our core values of authenticity, passion, and boldness. We strive to leverage AI ethically and responsibly, upholding integrity and compliance with relevant laws, and commitments to our customers, colleagues, partners and suppliers. Our initiatives prioritize transparency, inclusivity, and respect for human rights while driving positive change for our clients and communities.

Our AI Policy outlines our principles for responsible AI use, focusing on human oversight, technical safety, privacy, diversity, fairness, and accountability. These guidelines ensure that our AI systems operate ethically and transparently, promoting social and environmental well-being.

Raising concerns

As part of our commitment to conduct our business with the highest level of integrity and ethics and to help detect, prevent and report all acts that contradict our value, breach our Code and associated policies we operate the Raise Your Concern Channel allowing for confidential reporting of actual or suspected breaches. The channel is available to everyone via the link provided on our corporate website. Every time a concern is raised an investigation will take place under the guidance of AMS's Risk & Compliance.

We aim to encourage openness and will support anyone who raises genuine concerns in good faith, even if they turn out to be mistaken. 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.

Document control

This document was last reviewed and updated in May 2025. In line with AMS's Quality Management System (QMS) the next review is scheduled for no later than May 2026. Document Version Control is managed centrally, and access is restricted, please request if required.



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