

A|M|S

People powered partnership

Ethical Business Policies

An overview of AMS's framework for ethical, responsible and compliant business practices



Introduction

At AMS, we are committed to being a trusted partner to our clients and to safeguarding our reputation for reliability, integrity, and ethical, legally compliant business practices in every country in which we operate. We recognize our responsibility to our clients, partners, communities, and colleagues to conduct our business with the highest standards of integrity, transparency, and excellence in all our interactions.

In support of these commitments, we strive to maintain best-in-class standards across all areas of our business and operate robust governance, risk, and control frameworks aligned with recognized international and industry standards. AMS holds a range of external certifications and attestations, including ISO 9001, ISO 27001, ISO 45001, ISO 14001, ISO 22301, Cyber Essentials, Cyber Essential Plus as published on our website under the Trust Center. These independent validations provide our clients and partners with assurance regarding the effectiveness of our controls and our ongoing commitment to continuous improvement.

To further support these commitments, AMS maintains a suite of policies that help employees understand our values, expected behaviors, responsibilities, and standards of ethical conduct. These policies apply to all AMS employees and set out the conduct expected of them both in the workplace and in any situation where they act as representatives of AMS. They are designed to provide a consistent reference point for the delivery of our services to clients and to ensure compliance with applicable legislative and regulatory requirements.

This document sets out the core principles, standards, and commitments that underpin how Alexander Mann Solutions (AMS) conducts business globally. It is intended to provide clients, partners, suppliers, and other external stakeholders with a clear understanding of AMS's approach to ethical and responsible business practices, including our expectations for integrity, compliance with applicable laws and regulations, and responsible conduct across our operations.

Global Code of Conduct

The Global Code of Conduct (the 'Code') is a framework that guides all our colleagues to better understand our values, the behaviors that are expected of us, and the way we do business. It is designed to provide a reference for 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 behavior 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.

Legal and Regulatory Compliance

As a global talent acquisition business, we recognize that it is critical to our success to understand relevant country specific legislation and ensure it is always followed. 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.

Anti-Bribery, Fraud and Corruption

We value our reputation for reliability, integrity, and ethical and legally compliant business practices in all countries we operate in. We recognize 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.

The fight against any acts of fraud, bribery and corruption is endorsed and supported at the most senior level within AMS and we maintain a zero-tolerance approach to bribery, corruption, and improper influence in any form within our business and our supply chain.

All individuals are expected to act honestly and transparently in all their dealings.

Gifts and Hospitality

The 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 behavior. Our business decisions must never be influenced by gifts, hospitality, or improper benefits.

We expect all individuals to be transparent and follow applicable reporting processes for any gifts and hospitality received or offered.

Money Laundering and Tax Evasion

It is 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.

We expect all individuals to act honestly and transparently in all financial matters and to promptly report any suspicious activities.

Conflict of Interest

At AMS, we recognize 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. Failure to manage conflicts of interest properly may damage our reputation and cause our clients and business partners doubt in our fairness and objectivity.

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, i.e., restrictions on transactions involving certain products or services with targeted countries, entities or individuals imposed by international organizations, 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 penalties being imposed on AMS.

We are committed to not doing business in sanctioned 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.

Competition & Anti-Trust Compliance

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.

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 the responsibility of all individuals that they do not engage or involve AMS in any illegal practices that lead to breach of these laws.

Ethical Walls

We recognize the importance of maintaining fairness, objectivity, and impartiality in the way we conduct our business. We must all commit to ethical and professional conduct and ensure that we always act in the best interests of AMS. This includes avoiding situations, particularly where the clients we support may be in direct competition, where access to information, involvement in specific workstreams, or interactions across teams could compromise confidentiality, create undue influence, or impair an individual's ability to make clear and objective decisions.

Because inappropriate information-sharing or insufficient separation of duties can be detrimental to our business, our clients, and the integrity of our operations, ethical walls must be established and respected wherever required. These measures help prevent actual or perceived conflicts, protect sensitive information, and uphold independent and unbiased decision-making. Failure to adhere to Ethical Wall requirements may damage our reputation and cause clients and business partners to question our ability to operate with fairness and integrity.

Sustainability

Monitoring and continuously improving an organization'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 Environmental commitments focus on measuring and reducing our global carbon footprint, supporting the transition to a low-carbon economy, and progressing towards our Science Based Targets initiative (SBTi) validated climate targets and our long-term Net Zero commitment. Our Social commitments focus on promoting diversity, equity, inclusion and belonging, supporting employee wellbeing, and contributing positively to the communities in which we operate. Our Governance commitments are delivered through a strong corporate governance framework supported by robust policies, risk management practices, and responsible use of technology, ensuring effective decision-making and compliance with applicable laws and regulations.

Human Rights and Modern Slavery

As a global business interacting with people around the world, we are committed to respecting the fundamental human rights of all individuals we work with, including colleagues, contractors, clients, and workers within our supply chains. We support internationally recognized human rights frameworks and expect all those representing AMS to contribute to a safe, fair, and dignified

workplace. We expect all individuals to adhere to these principles and to actively promote a culture of respect and inclusion.

We are also committed to use all reasonable efforts to prevent child labor, human trafficking, forced labor 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. AMS requires all individuals to remain vigilant of the risks and indicators of modern slavery.

Equal Opportunities and Non-Discrimination

AMS is a diverse company operating across many sectors, geographies, and the talent spectrum, from graduates to executives. Individuals working for AMS 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 victimization 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 in the principles of providing equality of opportunity in every aspect of work and the way we do business.

Harassment, Bullying and Victimization

Harassment, bullying, and victimization are unacceptable behaviors that violate a person's dignity, make people feel intimidated, degraded, or humiliated and create a hostile and offensive work environment.

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 victimization in the workplace and other work-related settings.

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

Diversity, Equity, Inclusion and Belonging (DEIB)

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 DEIB is grounded in respect, fairness and opportunity for all, principles that underpin how we operate globally.

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, as inclusive teams perform better, innovate more effectively and build stronger client partnerships. We strive to build a culture of allyship, supporting our leaders to inspire, include, and address behaviors that do not align with our AMS values.

Health, Safety & Wellbeing

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 minimize 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

We recognize that working conditions play a crucial role in wellbeing, productivity, and overall job satisfaction. Working conditions encompass everything from physical safety, remuneration and fair wages, working hours and 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 individuals.

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

We believe that open and meaningful dialogue between with leadership is essential for a positive, inclusive, and high-performing workplace. Social dialogue includes formal and informal ways for individuals 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 in which we operate, we are committed to fostering engagement and acting in accordance with local legislation where required. Through structured forums, regular leadership communication, and

dedicated feedback channels, we ensure that every voice matters.

Data Protection

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

We recognize 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 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 recognize 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.

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 clients, colleagues, partners, and

suppliers. Our initiatives prioritize transparency, inclusiveness, 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.

— Further Information

Further information on AMS's ethical and compliance framework, including our policies, controls, and governance arrangements, is available via the AMS Trust Center on the AMS website.

Should you have any questions regarding this document or require additional information, please contact AMS using the details provided on our website, and a member of the appropriate team will be happy to assist.



Document Control

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