



People powered partnership

# Supplier Code of Conduct

Working with AMS

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# Introduction

The Supplier Code of Conduct (the ‘Code’) sets out values, behaviours, responsibilities, and standards of ethical business conduct that all suppliers working with AMS are expected to follow. This Code applies to all suppliers providing products and services to AMS. We also expect our suppliers to apply minimum requirements outlined in this Code to 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 and 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 within their own operations and supply chain to comply with all applicable legal, ethical, social, and environmental requirements and best industry practices.

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 bounding contractual agreements.

The Code is divided into the following sections:

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# 1. Core Principles

## Compliance with applicable laws and regulations

AMS operates on a global basis, so it is critical to our success that we follow all relevant country specific laws and regulations. We are committed to conducting our business activities with honesty and integrity, and in compliance with all applicable laws and regulations in all countries where we operate to avoid damage to our reputation and financial standing.

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

This encompasses all areas outlined within this Code, including but not limited to laws which apply to employment, human rights, health and safety, the environment, prevention of fraud, bribery and corruption, data protection, fair competition and antitrust.

## Policies and guidelines

AMS policies and guidelines support our commitment to operate in fair and ethical ways and in compliance with all local laws and regulations. Guidelines, procedures, rules, and standards of conduct set out in our policies and handbooks are to ensure we consistently operate in that manner. Our policies include but are not limited to the following:

- Global Code of Conduct
- 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/or procedures in place that are appropriate for the business they operate, its size, a jurisdiction where they operate, and relevant to the products or services provided to us and our clients.

## Sustainability (ESG)

AMS is dedicated to upholding and promoting sustainable practices under the ESG framework, which encompasses environmental, social, and governance impacts. Monitoring and continually enhancing these impacts strengthens resilience, fosters long-term growth, reduces operational costs, attracts talent, and builds trust with current and prospective clients.

At AMS, we focus our efforts on six United Nations Sustainable Development Goals where we believe we can have the 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 to the 'Environmental' pillar includes achieving Carbon Neutrality by 2025 and Carbon Net Zero by 2050. The 'Social' pillar centres on gender equality, reduced inequalities, and the promotion of good health and wellbeing, while our 'Governance' commitments are realised through a robust governance framework of policies and practices that drive ethical decision-making and legal compliance.

By agreeing to our Supplier Code of Conduct, suppliers commit to uphold high standards of labour and human rights practices, including safe working conditions, comprehensive health and safety measures, and zero tolerance for discrimination or harassment. Furthermore, suppliers are encouraged to engage in responsible environmental practices, such as reducing energy consumption and greenhouse gas emissions, protecting biodiversity, and implementing effective waste management.

We also require that suppliers comply with all relevant local and national laws related to sustainability in their countries of operation. Where appropriate, we encourage our suppliers to adopt science-based carbon reduction targets, and conduct ESG materiality assessments to help identify and address their most significant sustainability risks and opportunities. We understand that smaller suppliers may have varying levels of capacity to implement these practices. In such cases, we encourage suppliers to take reasonable and practical steps to improve their sustainability performance in a way that aligns with shared sustainability goals.

## Respecting human rights

As a global business interacting with people around the world, AMS is 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 committed to respecting and protecting the rights of individuals and communities affected by our operations, including rights to property, land, self-determination, safety, and security.

- **Rights to property and land:** These rights ensure that individuals and communities are not unfairly displaced or deprived of resources essential to their livelihoods.
- **Right to self-determination:** This protects the ability of individuals and communities, particularly indigenous peoples, to make decisions about their land, resources, and way of life without external interference.
- **Rights to safety and security:** Suppliers must ensure their operations do not endanger individuals or communities, and they must actively prevent harm such as violence, intimidation, or unsafe working and living conditions.

Where applicable, we expect our suppliers to:

- Identify and address potential impacts on these rights from their operations.
- Take relevant steps to prevent and mitigate risks to affected communities.
- Engage openly and constructively with communities to address any concerns.

Furthermore, we are committed to use all reasonable efforts to prevent human trafficking, forced labour, child 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.

We expect our suppliers to have reasonable measures in place to prevent any form of human trafficking or forced labour within their own operations and their supply chain. We also expect our suppliers to look out for any warning signs of modern slavery in their operations, to have appropriate channels to report any concerns, and to apply adequate due diligence measures that are appropriate for both their organisation and their supply chain.

## 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 expect that suppliers never engage in any acts of fraud, bribery or corruption, including promising, offering, providing, or authorising anything of value to AMS or AMS's client, a government official or political entity to gain an unfair business advantage or receiving any of the same.

We expect all suppliers to take reasonable steps to prevent, detect and report any cases of bribery and corruption, as appropriate, as well as comply with all applicable anti-corruption laws, and that the same is enforced within their supply chain.

## 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, gifts and hospitality should never be offered or accepted where they may result in a conflict of interest between personal interest and professional duty, or where they are to influence, or appear to influence, a decision-making process.

AMS is 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 must never be influenced by gifts, hospitality, or improper benefits.

We expect our suppliers to acknowledge and agree to comply with these principles and not to offer or accept anything of value to obtain unfair business advantages, to influence decisions, or where such would result in a conflict of interest.

## Fight against money laundering and tax evasion

It's an essential part of running a business and a legal requirement to keep accurate records that truthfully and accurately reflect all monetary transactions, including income and cost data.

As global corporate citizens, AMS is 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 suppliers to have reasonable measures in place to comply with local tax rules and local and international reporting rules, and to ensure none of activities within their business and supply chain are used to launder money from criminal activity.

## Sanctions compliance

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. 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 expects its suppliers to have appropriate due diligence in place and operate in alignment with applicable laws and regulations, including compliance with relevant sanctions 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.

AMS expects its suppliers to operate in alignment with applicable competition and anti-trust laws and regulations and have appropriate measures in place to ensure they do not engage in activities that would lead to a breach of said laws.





## 2. Fair and Ethical Labour Practices

### Equal opportunities and non-discrimination

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

We are committed to proactively taking a stand against discrimination and social injustice and have zero tolerance for any form of discrimination, harassment or victimisation. 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, sex, , disability, sexual orientation, gender identity, gender expression, gender re-assignment, race, caste, religion or belief, marital status, political belief, marriage/civil partnership status, pregnancy/maternity, other non-merit characteristics, or any other classification protected by law.

AMS is committed to be an Equal Opportunity Employer and we are steadfast to the principles of providing equality of opportunity in every aspect of work and the way we do business.

We expect our suppliers to adopt appropriate measures 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.

We also expect our suppliers to take a zero-tolerance approach to any form of discrimination, harassment, or victimisation, and in compliance with local anti-discrimination laws.



## 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. We have appropriate policies, procedures and training in place to ensure we meet our commitment to being a workplace free of bullying and harassment.

AMS expects its suppliers to treat others with respect and dignity, and without any form of discrimination, and have reasonable measures in place to support this.

## Diversity, equity and inclusion (DE&I)

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.

We are hugely passionate and committed to making long-term, significant change and creating a culture of inclusivity, where everyone feels a sense of belonging and can bring their true, authentic selves to work. 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 DE&I promises or AMS values.

We expect our suppliers to adopt appropriate measures to 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.

## 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 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.

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. We also expect that suppliers have reasonable measures in place to 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.

A photograph of three business professionals sitting around a conference table. On the left, a man with glasses and a beard, wearing a dark suit and tie, is gesturing with his hands while speaking. In the center, a man with short hair and a beard, wearing a light blue button-down shirt, is looking towards the woman on the right. On the right, a woman with braided hair, wearing an orange blazer over a white top, is listening attentively. The table has a laptop, several glasses of water, and some papers. The background shows a modern office interior with large windows and indoor plants.

## 3. Ethical Conduct

### Ethical personal conduct

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

We expect our suppliers and their personnel to act ethically, honestly, and fairly in all aspects of its business, practices, operations, and relationships with AMS and its clients.

### Conflicts of interest

At AMS, we recognise the importance of fairness and objectivity in the way we conduct our business, and we commit ourselves to ethical and professional conduct as we all have a duty to act in the best interest of AMS. As such, we 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, we require all conflicts of interest and appearances of conflicts of interest to go through our disclosure and resolution process.

We expect all suppliers not to 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 also 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 principles set out in this Code and relevant to, or is in connection with, products or services provided to us or our clients.

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

Raise your concern in writing on [www.AMSRaiseYourConcern.com](https://www.AMSRaiseYourConcern.com) - the information suppliers provide will be treated in a confidential manner unless they provide contact details.

Raise your concern via telephone - suppliers can locate the local number from the drop-down list on [www.AMSRaiseYourConcern.com](https://www.AMSRaiseYourConcern.com). The hotline is operated by an independent third party. A specially trained representative will listen to concerns raised by suppliers and review the information to ensure it is accurate.

Once a supplier has raised a concern, 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, 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 any concerns and breaches, as appropriate to their organisation. Suppliers must protect the whistleblower's confidentiality, prohibit retaliation, and adhere to whistleblowing requirements as applicable in line with local laws and regulations.





## 4. Protection of Assets

### Data privacy

At AMS, 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 we interact with.

Whether our suppliers process data on behalf of AMS, or on behalf of one or more of our clients, or they operate independently of our instruction as data controllers, we expect them and their business partners to comply with all applicable privacy legislation appropriate to their business and jurisdiction they operate in.

We expect all suppliers to commit themselves to deliver a compliant service, to work alongside AMS and/or our clients to ensure that 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 by emailing the AMS Privacy Office at [dataprotection@weareams.com](mailto:dataprotection@weareams.com).

## Artificial Intelligence (AI)

In accordance with our commitment to ethical and responsible conduct, suppliers are expected to ensure that any use of Artificial Intelligence (AI) in their operations adheres to the highest standards of fairness, transparency, and accountability. AI systems should be designed and used in a manner that respects the rights and freedoms of individuals, including privacy and data protection rights. Any decisions made by AI should be explainable and subject to human oversight. Suppliers must also commit to using AI in a way that avoids harm, discrimination, and bias, and they should be prepared to demonstrate their adherence to these principles upon request.

## 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. As information is becoming increasingly electronic it is vulnerable to attack, abuse, misapplication, or carelessness.

In our very fast-moving business and technology environment, it is imperative that we are all fully conscious of the risks we and our business run if the availability, integrity and confidentiality of our information and our information systems, are not fully secured. To support our commitment, we have established policies and procedures to help protect our information resources and information systems.

AMS policy and standard practice is to ensure 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 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 products or 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 ongoing suitability and adherence with best industry standards.

## 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.

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, its people and 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 intellectual property rights of AMS and its clients and comply with any agreements they have with us about the use of our intellectual property.



## 5. Resilience and Risk Management

### 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 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 are 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 and 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.



## 6. Assurance

### Supplier assurance

AMS's Risk & Compliance function provides assurance in all areas outlined in this Code. We expect all suppliers to carry out assurance to ensure their activities are in line with the principles outlined in this Code.

### Non-compliance with the Code

Non-compliance with this Code would be detrimental to our business and our clients therefore we expect our suppliers to acknowledge and commit to the adherence of the principles set out in the Code.

We expect and encourage our suppliers to develop and implement relevant measures, appropriate for a company of their size and industry, to ensure compliance with all applicable laws and regulations, and principles of this Code.

We also expect our suppliers to bridge any gaps they may have in the implementation of requirements set by relevant laws and regulations and this Code and encourage them to consult with AMS should they require any support or guidance. While the key objective of this Code is to establish a baseline for sustainable ongoing working relationship between AMS and its suppliers in line with the best industry practice and applicable laws, we reserve the right to take action, including termination of contracts, in case of severe violations of the Code.

## Disclaimer

If any requirement of this Supplier Code of Conduct is, or becomes invalid, illegal or unenforceable in any jurisdiction, the requirement shall be considered deleted to the minimum amount necessary in the applicable jurisdiction (which can include deleting only part of the relevant requirement). It will remain in full force without deletion, in jurisdictions where it is not invalid, illegal, or unenforceable. The deletion of a specific requirement or portion shall not affect the validity and enforceability of the remainder of this Code. If any part of the Code conflicts with applicable local laws and regulations, or where they impose standards higher than those set in this Code, the law prevails.

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



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