



Supplier Code of Conduct

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Accsys (or "the Group") is committed to conducting business ethically and sustainably. Accsys employs the following principles to achieve this aim and expects the following from its suppliers:

1. Scope of Application

- 1.1 The principles within this Code of Conduct set out Accsys' expectations for all suppliers with which it does business. Accsys expects that these principles apply to suppliers and their employees, parent, subsidiary or affiliate entities, and subcontractors.
- 1.2 Accsys expects suppliers to ensure that this Code of Conduct is communicated as necessary inside and outside their organisations, and that it is done in the local language and in a manner that is understood by all.

2. Continuous Improvement

- 2.1 The principles set out in this Code of Conduct provide the minimum standards expected of suppliers to Accsys. Accsys expects suppliers to strive to exceed both international and industry best practices.
- 2.2 Accsys also expects that its suppliers encourage and work with their own suppliers and subcontractors to ensure that they also strive to meet the principles of this Code of Conduct. Accsys recognises that reaching some of the standards established in this Code of Conduct is a dynamic rather than static process and encourages suppliers to continually improve their workplace conditions accordingly.

3. Labour

3.1 Forced Labour and Child Labour

Accsys expects its suppliers to prohibit forced or compulsory labour in all its forms. Accsys also expects its suppliers not to employ: (a) children below 15 years of age or, if higher than that age, the minimum age of employment permitted by the law of the country or countries where the performance, in whole or in part, of a contract takes place, or the age of the end of compulsory schooling in that country or countries, whichever is higher; and (b) persons under the age of 18 for work that, by its nature or the circumstances in which it is carried out, is likely to harm the health, safety or morals of such persons.

3.2 Modern Slavery and Human Trafficking

Accsys expects its suppliers to comply with all relevant regulations prohibiting modern slavery and human trafficking and to implement policies, procedures and practices which aim to ensure the supplier's business remains free from slavery and human trafficking.

3.3 Discrimination

Accsys expects its suppliers to ensure equality of opportunity and treatment in respect of employment and occupation without discrimination on grounds of race, colour, age, gender, sexual orientation, disability, pregnancy, religion, political opinion, national or social origin and such other ground as may be recognised under the national law of the country or countries where the performance, in whole or in part, of a contract takes place.

3.4 Wages, Working Hours and Other Conditions of Work

Accsys expects its suppliers to ensure the payment of wages in legal tender, at regular intervals with payments no more than one month apart from each other, in full and directly to the workers concerned. Suppliers should keep an appropriate record of such payments.

Deductions from wages are permitted only under conditions and to the extent prescribed by the applicable law, regulations or collective agreement, and suppliers should inform the workers concerned of such deductions at the time of each payment.

The wages, hours of work, resting hours, consecutive days of work permitted and other conditions of work provided by suppliers should not be less favourable than the prevailing conditions locally as contained in: (a) collective agreements covering a substantial proportion of employers and workers; (b) arbitration awards; or (c) applicable laws or regulations, for work of the same character performed in the trade or industry concerned in the area where work is carried out.

Accsys expects its suppliers to take steps towards paying their employees the national living wage.

3.5 Freedom of Association and Collective Bargaining

Accsys expects its suppliers to respect their workers' rights to participate in collective bargaining and freedom of association. All workers should have the right to join or form trade unions and to bargain collectively in relation to employment related matters.

Workers' representatives must not be discriminated against and must have access to carry out their representative functions in the supplier's workplace.

4. Health and Safety

4.1 Safe Workplace

Accsys expects its suppliers to ensure, so far as is reasonably practicable, that: (a) the workplaces, machinery, equipment and processes under their control are safe and without risk to health when the appropriate measures of protection are taken; (b) the chemical, physical and biological substances and agents under their control are without risk to health when the appropriate measures of protection are taken; and (c) where necessary, adequate protective clothing, protective equipment and safety training are provided to prevent, so far as is reasonably practicable, risk of accidents or of adverse effects to health.

4.2 Compliance with Health and Safety Laws

Accsys expects its suppliers to comply with all applicable health and safety laws and regulations.

4.3 Policies

Suppliers are expected to have in place policies which have the aim of protecting the health and safety of all workers and others who are involved with the supplier's business activities. These policies should include suitable procedures for the investigation of accidents and incidents, as well as emergency response procedures.

4.4 Risk Assessment and Risk Management

Suppliers are expected to have appropriate risk assessment procedures in place to recognise and assess health and safety risks and implement appropriate risk controls to reduce or mitigate them.

5. Human Rights

5.1 Human Rights

Accsys expects its suppliers to support and respect the protection of internationally proclaimed human rights including those encompassed in the UN Guiding Principles on Business and Human Rights, Universal Declaration of Human Rights, International Bill of Rights, and the International Labour Organisation's Declaration on Fundamental Principles and Rights at Work and to ensure that they are not complicit in human rights abuses.

5.2 Harassment, Harsh or Inhumane Treatment

Accsys expects its suppliers to create and maintain an environment that treats all employees with dignity and respect and will not use any threats of violence, sexual exploitation or abuse, verbal or psychological harassment or abuse. No harsh or inhumane treatment, coercion or corporal punishment of any kind is tolerated, nor is there to be the threat of any such treatment.

6. Sustainability and the Environment

6.1 Environmental Policy and Legislation

Accsys expects its suppliers to have an environmental policy in place and to comply with existing legislation and regulations regarding protection of the environment. Suppliers should, wherever possible, support a precautionary approach to environmental matters, undertake initiatives to promote greater environmental responsibility, including on greenhouse gas emissions and energy consumption, and encourage the diffusion of environmentally friendly technologies implementing life-cycle practices.

Accsys expects its suppliers to report to it any environmental incidents relevant to Accsys, including hazardous material spillages.

6.2 Chemical and Hazardous Materials

Chemical and other materials posing a hazard if released to the environment are to be identified and managed to ensure their safe handling, movement, storage, recycling or reuse and disposal.

6.3 Wastewater and Solid Waste

Wastewater and solid waste generated from operations, industrial processes and sanitation facilities are to be monitored, controlled and treated as required prior to discharge or disposal.

6.4 Air Emissions

Air emissions of volatile organic chemicals, aerosols, corrosives, particulates, ozone depleting chemicals and combustion by-products generated from operations are to be characterised, monitored, controlled and treated as required prior to discharge or

disposal.

6.5 Minimise Waste, Maximise Recycling

Waste of all types, including water and energy, are to be reduced or eliminated at the source or by practices such as modifying production, resource efficiency, maintenance and facility processes, materials substitution, conservation, recycling and re-using materials.

6.6 Biodiversity

Accsys expects its suppliers to demonstrate their commitment to protecting and minimising any negative effect on biodiversity where relevant and ensure that they have sustainable sourcing practices in place.

7. Quality

Suppliers are expected to ensure that their products or services meet or exceed any applicable contractual requirements and specifications and that they can demonstrate, where possible, continuous growth through design and development of existing and/or new products while maintaining quality standards.

8. Ethical Conduct

8.1 Corruption

Accsys expects its suppliers not to engage in any form of corrupt practices, including but not limited to extortion, fraud or bribery.

8.2 Conflict of Interest

Accsys suppliers are expected to disclose to Accsys any situation that may appear as a conflict of interest, and disclose to Accsys if any Accsys member of staff or professional under contract with Accsys may have an interest in the supplier's business or any kind of economic ties with the supplier.

8.3 Gifts and Hospitality

Accsys expects its suppliers to comply fully with the United Kingdom Bribery Act 2010 and/or other similar local regulations, which must be no less stringent.

Suppliers must not agree to give or receive any inducement or reward with the intention of gaining a commercial, contractual, regulatory or personal advantage. Suppliers are expected to implement policies to guard against this and communicate what is acceptable and what is not to all workers.

8.4 Due Diligence

Suppliers are expected to have appropriate due diligence procedures in place to detect and prevent corruption in any of their business relationships, such as with their suppliers, partners, joint ventures and the use of third parties such as consultants and agents.

8.5 Grievance Procedures

Accsys expects suppliers to have in place appropriate whistleblowing procedures whereby workers can raise concerns or grievances without fear of facing harassment,

intimidation or reprisal.

8.6 Post-employment restrictions

Post-employment restrictions may apply to Accsys staff in service and former Accsys staff members who participated in the procurement process, if such persons had prior professional dealings with suppliers. Accsys' suppliers are expected to refrain from offering employment to any such person for a period of one year following separation from service.

8.7 Screening

Suppliers are expected to screen their suppliers and business partners to ensure any such parties are not subject to any sanctions or similar measures.

9. Legal Compliance

9.1 Laws and Regulations

Accsys expects its suppliers to abide by all applicable laws and regulations.

9.2 Competition Law

Accsys expects its suppliers not to engage in anti-competitive behaviour. This includes activities which could undermine fair market competition, such as price-fixing, bid-rigging, market division or engaging in a cartel.

Suppliers are expected to educate their workers on what anti-competitive behaviour looks like and have policies and procedures in place to prevent such behaviour from occurring.

9.3 Data Protection

Suppliers are expected to have a policy in place which protects any personal data sent by Accsys to the supplier in accordance with any contract which may be in place and the applicable data protection and privacy laws.

9.4 Cybersecurity

Accsys expects its suppliers to have appropriate safeguards in place to protect information provided to them and developed through its work with Accsys from unauthorised access, loss improper use, modification and disclosure.

In the event that there is a data breach affecting Accsys' data, suppliers are expected to report this to Accsys immediately.

9.5 Intellectual Property Rights and Confidentiality

Accsys expects its suppliers to respect the intellectual property rights of itself and others as well as protecting confidential, proprietary and personal information.

9.6 Tax

Suppliers are expected to comply with all applicable tax laws and regulations in the countries in which they operate, as well as to have a policy in place to prevent the facilitation of tax evasion.

9.7 Permits

Accsys expects its suppliers to hold in place valid permits and certifications covering all of its activities as required by law and regulations and as specified in any documents provided during the procurement process.

10. How to Raise A Concern

- 10.1 Suppliers are expected to report any concerns of breaches or potential breaches of this Code of Conduct to their usual contact at Accsys.

11. Monitoring and Effect of Non-Compliance

- 11.1 Accsys expects that suppliers have appropriate policies and procedures in place to meet the principles set out in this Code of Conduct and that they actively review, monitor and modify their management processes and business operations to ensure that they align with these principles.
- 11.2 Accsys may monitor that steps have been taken to ensure that the principles set out in this Code of Conduct have been met. Failure by the supplier to take these steps may prevent Accsys from being able to do business with that supplier in the future.
- 11.3 To review the progress of suppliers in implementing this Code of Conduct, Accsys may take various steps, including requesting suppliers to certify that they comply with the Code of Conduct and in some cases, Accsys may seek to conduct on-site evaluations and inspections of any relevant supplier's facilities.