# Supply Chain Code of Conduct

**11 December 2025**

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## Contents


1. Introduction 3
2. Scope 3
3. Ethics Policy 3
4. Anti-Bribery and Corruption 4
5. Facilitation Payments 6
6. Gifts & Entertainment 6
7. Conflict of Interest 6
8. Fraud 7
9. Confidentiality and Intellectual Property Rights 7
10. Fair Competition 7
11. Equal Opportunities and Anti-Discrimination 8
12. Data Protection 9
13. Health, Safety and Environment Matters 9
14. Modern Slavery and Human Rights 10
15. Export Controls and Trade Sanctions 12
16. Service Providers and Business Partners 12
17. Tax (including Anti-Facilitation of Tax Evasion) 13
18. Monitoring and Consequences of Non-Compliance 14
19. Who can I contact if I have any questions or concerns? 14




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## 1. Introduction

1.1 Accsys Technologies PLC ("Accsys" of "the Group" is committed to and believes in conducting business to the highest possible standards. The purpose of this Supply Chain Code of Conduct (this "Code") is to set out the principles to achieve this aim and outline the expectations Accsys for all suppliers with which it does business.

## 2. Scope

2.1 The principles within this Code provide the minimum standards expected of suppliers to Accsys. Accsys expects that these principles apply to suppliers and their employees, parent, subsidiary or affiliate entities, and subcontractors. Accsys expects its suppliers to strive to exceed both international and industry best practice.

2.2 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. Accsys also expects that is suppliers encourage and work with their own suppliers and subcontractors to meet the principles of this Code.

2.3 Suppliers include vendors, contractors, joint venture partners, agents and all others performing services for or on Accsys' behalf (also referred to below as "Service Providers and Business Partners").

## 3. Ethics Policy

3.1 Quality good faith, honesty, integrity, safe operations and respect for the law and ethical practices underpin Accsys' business activities. These values shall also serve as basis for how our suppliers shall conduct their business regardless of geographic location, business area or professional level.

3.2 **All suppliers must:**

3.2.1 Conduct themselves in a professional and ethical manner in accordance with the highest standard of business practice;

3.2.2 Observe the highest standards of integrity and fair dealing; and

3.2.3 Follow this Code and the Group's policies and procedures for example, relating to anti-corruption & anti-money laundering, environmental, social & governance, environmental protection, occupational health and safety, human rights and security.



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3.3 This Code supplements and does not replace the requirement to comply with the laws in the countries in which our suppliers operate. Where there are differences between the local law and this Code, suppliers must apply whichever sets the highest standard of behaviour.

3.4 The Code cannot address every conceivable situation. In many circumstances, the law or this Code will clearly dictate what you should do, but on other occasions the situation will require you to exercise judgment. Always err on the side of caution.

3.5 If you have a concern that someone has acted in a manner inconsistent with this Code, you have a responsibility to raise the issue. Suppliers are expected to report any concerns of breaches or potential breaches of this Code of Conduct to their usual contact at Accsys.

3.6 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.

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

## 4. Anti-Bribery and Corruption

4.1 Accsys does not tolerate or permit bribery, corruption, or improper payments of any kind and expects its suppliers not to engage in any form of corrupt practices, including but not limited to extortion, fraud or bribery. This applies anywhere in the world, including wherever business is operated on Accsys' behalf.

4.2 Bribery of government officials, public officials, employees or agents of businesses, in any part of the world, is prohibited under the UK law, US law, and the laws of most other countries. UK and US bribery laws are vigorously enforced, and the penalties are severe. Individuals who engage in bribery face a real risk of imprisonment.

4.3 **What is bribery and corruption?**

**Bribery** means trying to influence a business decision or making it easier to do a piece of work by offering or receiving cash, gifts or other incentives, either directly or through someone else. Bribery can take many forms and can



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include gifts, hospitality, personal benefits and cash. We all need to be mindful of the intentions of external parties when they offer us anything.

Bribes usually take the form of improper payments or personal "commissions". They can, however, take on many different shapes and forms, such as gifts, holidays, reimbursement of travel and other expenses, secret rebates, charitable or political donations, job offers, scholarships, and excessive hospitality.

In respect of public officials (any person who exercises a public function), a bribe can be anything of value that is offered or given with the intention of influencing the public official to obtain or retain a business advantage; this is a low threshold as it does not require an intention that the official exercises their role improperly.

**Corruption** is the misuse of public office or a business position for private gain.

4.4 For more information see Accsys' Anti-Bribery, Anti-Corruption, Gifts and Hospitality, Anti- Facilitation of Tax Evasion & Conflict of Interest Policy.

## 5. Facilitation Payments

5.1 Facilitation payments are unofficial payments paid to speed up an administrative process or secure a routine government or local authority action by an official. It is important that all suppliers can recognise where a payment might be a facilitation payment. Unless permitted by the local written laws in the jurisdiction in which the payment is made, facilitation payments are treated as bribes under UK law and other laws and are prohibited by Accsys. A typical example of a facilitation payment is a payment to a customs officer to get goods through customs more quickly.

## 6. Gifts and Entertainment

6.1 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.



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6.2 As a rule, hospitality and / or gifts must be occasional, modest, transparent and consistent with applicable laws and standard industry practice.

6.3 Cash payments should not be made or received.

## 7. Conflicts of Interest

7.1 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 suppliers' business or any kind of economic ties with the supplier.

7.2 A conflict of interest is an activity, working relationship or situation, which could influence decisions you make and interfere with your relationship with Accsys. Conflicts of interest can happen when people's personal, social, financial or political activities interfere with the way they carry out their work and influence the decisions they take, in particular, their ability to make impartial decisions.

7.3 Wherever possible, conflicts of interest should be avoided but where they do arise it is important that they are disclosed as soon as is possible and managed appropriately. Any potential conflict of interest should be notified to your senior contact at Accsys.

7.4 Suppliers should note that 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. Fraud

8.1 All suspicions or discoveries of fraud connected to Accsys should be brought to the Group's attention immediately by reporting the suspicion / discovery to your senior contact at Accsys.

8.2 Fraud is committed when a person acts dishonestly intending to make a gain or to cause loss to another (or expose another to a risk of loss). The following are common types of fraud (the list is not exhaustive):

- Use or intended use of falsified documents for a normal business purpose;
- Submitting false/ misleading information in a tender process;
- Falsifying Service Providers/ Business Partners invoices;
- Theft of monies or other property where deception is used;
- Misuse of company time;



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- False references/ qualifications to secure employment

## 9. Confidentiality and Intellectual Property Rights

9.1 Accsys expects its suppliers to respect its intellectual property rights as well as protecting confidential, proprietary and personal information. Accsys' confidential information should also not be disclosed to colleagues or third parties who do not require the information for their normal work activities.

9.2 If the confidential information pertains to a publicly traded company, is not generally available and would be likely to influence a person's decision to invest or sell shares in that company then the disclosure of this information and any subsequent dealing could amount to insider trading. The disclosure or misuse of such insider information would be a breach of contract between Accsys and its business partners and service providers. It is also a criminal offence in certain countries to disclose insider information which results in dealing.

## 10. Fair Competition

10.1 Accsys expects its suppliers to comply with competition laws (referred to as antitrust laws in some countries) and not to engage in anti-competitive behaviour. These laws seek to promote free trade and prevent collusion between businesses which may disadvantage consumers. This includes activities which could undermine fair market competition, such as price-fixing, bid-rigging, market division, or engaging in a cartel.

10.2 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.

## 11. Equal Opportunities and Anti-Discrimination

11.1 Accsys expects its suppliers to ensure equality of opportunity and treatment in respect without discrimination. Accsys has a zero tolerance approach to harassment, or any other form of discrimination.

11.2 Accsys will not tolerate any bullying, harassment or other form of offensive conduct, particularly that which is related to an individual's gender, race, disability, pregnancy, sexual orientation, religion or belief, age, political opinion, national or social origin.

11.3 Accsys will not condone any form of sexual harassment and allegations of sexual harassment will be dealt with seriously, expeditiously, sensitively and confidentially as appropriate.



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11.4 Accsys expects that all individuals throughout the supply chain receive fair and equitable compensation for their work, regardless of gender, race, age, religion, sexual orientation, disability, or any other characteristic protected by law. This commitment is rooted in our dedication to upholding the principles of human rights and fostering a diverse and inclusive workplace and supply chain.

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

11.6 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.

## 12. Data Protection

12.1 Personal data sent by Accsys to a supplier is subject to certain legal safeguards specified by data protection laws, which impose restrictions on how organisations may collect, process, store, preserve, communicate or use personal data. Suppliers are expected to have a policy in place which protects any personal data in accordance with any contract which may be in place and the applicable data protection and privacy laws.

12.2 Such laws impose stricter controls in respect of "Sensitive Personal Data" which includes information relating to a person's:

- Racial or ethnic origin;
- Political opinion;
- Religious or other beliefs of a similar nature;
- Trade union membership;
- Physical or mental health or condition;
- Sexual preference;
- Commission or alleged commission of any criminal offence; and / or
- Criminal proceedings or convictions.

12.3 Accsys expects its suppliers to have appropriate safeguards in place to protect information provided to them and developed through its work with



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Accsys from unauthorized access, loss, improper use, modification and disclosure.

## 13. Health, Safety and Environment Matters

13.1 Accsys expects its suppliers to create a working environment that causes no harm to people, and to minimise their impact on the environment.

13.2 To achieve this Accsys' suppliers will:

13.1.1 Always comply with all applicable health and safety laws and regulations regarding protection of the environment, or Accsys' standards, whichever is higher;

13.1.2 So far as is reasonably practicable, suppliers must:

a) ensure 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.

13.1.3 Wherever possible, support a precautionary approach to environmental matters and undertake initiatives to promote greater environmental responsibility, including:

d) reduction of greenhouse gas emissions and energy consumption and encouraged diffusion of environmentally friendly technologies implementing life-cycle practices;
e) safe handling, movement, storage, recycling or reuse and disposal of chemical and other hazardous materials;
f) proper monitoring, control and treatment of wastewater and solid waste from operations, industrial processes and sanitation facilities, as required prior to discharge or disposal;
g) proper characterization, monitoring, control and treatment of air emissions, including but not limited to air emissions of volatile organic chemicals, ozone depleting chemicals and combustion by-products generated from operations, as required prior to discharge or disposal;
h) prevention of pollution and reduction or elimination of waste of all types, including water and energy, through practices such as modifying production, resource efficiency, maintenance, conservation, recycling and re-using materials; and
i) protecting and minimising any negative effect on biodiversity where relevant, supporting no net deforestation, and ensuring sustainable sourcing practices are in place.



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13.2 Have policies in place which have the aim of protecting the health and safety of all workers and others who are involved with the supplier's business activities. As well as an environmental policy in place regarding protection of the environment, which aligns with Accsys' Environment and Climate Change Policy.

13.3 These policies should include suitable procedures for the reporting and investigation of accidents and incidents, including hazardous material spillages, as well as emergency response procedures.

13.4 Suppliers are expected to have appropriate risk assessment and mitigation procedures and implement continuous improvement.

13.5 Safe operations in all business activity is a core value. If operational results and safety ever come into conflict, we all have a responsibility to choose safety over operational results and Accsys will support that choice.

## 14. Modern Slavery and Human Rights

14.1 Accsys expects its suppliers to conduct their business in accordance with the principles of, and with respect for, the Universal Declaration of Human Rights and the core labour standards recognised by the International Labour Organization ("ILO"), as set out in the ILO Declaration on Fundamental Principles and Rights at Work, and to ensure that they are not complicit in human rights abuses. Where standards are in conflict, suppliers should respect internationally recognised human rights to the greatest extent possible.

14.2 Slavery and human trafficking ("Modern Slavery") are crimes and a violation of human rights. Accsys has a zero tolerance approach to slavery and human trafficking in our business or supply chain. Accsys expects all suppliers to comply with Accsys' Human Rights Policy and comply with all relevant regulations prohibiting Modern Slavery. Suppliers must implement appropriate procedures which aim to ensure the supplier's business remains free from Modern Slavery. Any instance of Modern Slavery in our supply chain is a breach of the core values of our business.

14.3 The following key principles apply to Accsys and our supply chain:

14.3.1 We do not tolerate child labour in our operations or supply chain. All workers within our operations and supply chain must be at least 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. Suppliers should not employ persons under the



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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.

14.3.2 Any form of forced or compulsory labour must not be used. Workers must be free to leave employment or work after reasonable notice.

14.3.3 Passports, visas and other personal documentation should not be taken from workers.

14.3.4 All forms of debt bondage are prohibited. Workers should not be subject to contracts that tie them into repaying a loan, accommodation expenses or some other costs that they have no or little opportunity to repay.

14.3.5 Compensation and benefits must comply with local laws relating to minimum wages, overtime hours and other benefits.

14.3.6 The right to freedom of association through actions such as the formation of trade unions and reliance on collective bargaining should be respected.

14.3.7 Workers should have safe and healthy working conditions that meet or exceed applicable standards for occupational safety and health. Workers should receive regular health and safety training.

14.3.8 Any form or threat of physical, sexual or verbal abuse, harassment, discrimination or other forms of intimidation must not be used.

## 15. Export Controls and Trade Sanctions

15.1 Suppliers should at all times comply with all applicable import and export controls and sanctions. Exports can apply to the electronic transfer of data.

15.2 Failure to adhere to such controls and sanctions could severely impact on Accsys, our suppliers and those individuals involved. Potential penalties for non-compliance include the withdrawal of export licences, the imposition of criminal and civil fines and imprisonment.

15.3 Before entering into a contract, supplying or buying equipment, or transferring money, it is important to assess any sanctions risk associated connected to such dealings, including with the parties involved (and their owners and controllers).

15.4 We will not, and expect that our suppliers will not,:

15.4.1 Accept funds or deal with the assets belonging to, held or controlled by financial sanctions targets, designated as such under applicable sanctions regimes, nor make funds or other assets available (directly



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or indirectly) to, or for the benefit of, such targets. This also applies to companies and other businesses that are i) owned or controlled by and/ or ii) acting for the benefit of, a sanctions target;

15.4.2 Breach any trade or sectoral restrictions that target a particular dealing, this may be, for example, the provision of items (goods, technology or software, into, or for use in, a targeted country, the provision of services to persons in a targeted country or imports or purchases from the target country;

15.4.3 Take any steps to circumvent an applicable sanctions regime.

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

## 16. Service Providers and Business Partners

16.1 Supplier relations and dealings with government officials, Service Providers/ Business Partners, and other third parties should at all times be such that our integrity and reputation would not be damaged if details of the relationship or dealings were to become public knowledge.

16.2 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.

## 17. Tax (including Anti-Facilitation of Tax Evasion)

17.1 Suppliers are expected to comply with all applicable tax laws and regulations in the countries in which they operate, and to have robust procedures in place to identify and mitigate any risk of tax evasion. Tax evasion is when a person or business dishonestly does not account for any tax or duty they owe.

17.2 We will not tolerate any of our suppliers, associated persons, Service Providers and Business Partners concealing, disguising or misrepresenting their tax liability, or assisting, encouraging or facilitating tax evasion by any customers, suppliers or others that we do business with anywhere in the world.

17.3 Service Providers and Business Partners should put in place effective controls to prevent and detect tax evasion and its facilitation, and provide appropriate training, support and whistleblowing procedures to ensure their



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employees recognise the signs of tax evasion and immediately report any concerns. Suppliers must:

17.3.1 Comply with all legal requirements in all countries which they operate in.

17.3.2 Use fair tax practices and do not transfer value created to low tax jurisdictions

17.3.3 Not using tax structures that do not have commercial substance

17.3.4 Undertake transfer pricing using the arm's length principle.

17.3.5 Not use secrecy jurisdictions or so-called "tax havens" for tax avoidance

17.4 For more information see our Anti-Bribery, Anti-Corruption, Gifts and Hospitality, Anti- Facilitation of Tax Evasion & Conflict of Interest Policy.

## 18. Monitoring and Consequences of Non-Compliance

18.1 Accsys expects that suppliers have appropriate policies and procedures in place to meet the principles set out in this Code and that they actively review, monitor and modify their management processes and business operations to ensure that they align with these principles.

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

18.3 Accsys will not deal with Service Providers and Business Partners that act contrary to the principles set out in this Code and may monitor that steps have been taken to ensure that the principles have been met. This may include requesting suppliers to certify that they comply with this Code and in some cases, Accsys may seek to conduct on-site evaluations and inspections of any relevant supplier's facilities. Failure by the supplier to take these steps may prevent Accsys from being able to do business with that supplier in the future.

## 19. Who can I contact if I have any questions or concerns?

19.1 We encourage those who work with us to raise any concerns that something may not be consistent with our Code of Conduct. Generally, concerns should first be addressed and discussed with senior management within your



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organisation, who in turn should feel confident to raise concerns as appropriate with your senior contact at Accsys.

19.2 If you have any other questions or queries about anything in this Code, please get in touch with your senior contact at Accsys.



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