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SUPPLIER CODE OF CONDUCT

The Accsys Group is committed to conducting business ethically and sustainably. It employs and seeks that its suppliers employ the following principles to achieve this.

1. Scope of Application:

The provisions of this Code of Conduct set forth Accsys' expectations for all suppliers with whom it does business. Accsys expects that these principles apply to suppliers and their employees, parent, subsidiary or affiliate entities, and subcontractors. Accsys expects suppliers to ensure that this Code of Conduct is communicated to their employees, parent, subsidiary and affiliated entities as well as any subcontractors, and that it is done in the local language and in a manner that is understood by all.

2. Continuous Improvement:

The provisions as set forth 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. Access 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. Access 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. Management, Monitoring and Evaluation:

It is the expectation of Accsys that suppliers, at a minimum, have established clear goals toward meeting the standards set forth in this Code of Conduct. Access expects that its suppliers will establish and maintain appropriate management systems related to the content of this Code of Conduct and that they actively review, monitor and modify their management processes and business operations to ensure they align with the principles set forth in this Code of Conduct. Access may monitor that milestones have been set and management systems have been put in place to ensure that the principles set out in this Code of Conduct have been met and failure to do so may impact the future ability of a supplier to do business with Accsys. To review the progress of suppliers and subcontractors in implementing the Code of Conduct, Accsys may take various supporting initiatives, including requesting suppliers to commit to the Global Compact, to self-certify that they comply with the Code of Conduct and, in some cases, to conduct on site evaluations and inspections of supplier facilities and those of their subcontractors.

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LABOUR:

4. Freedom of Association and Collective Bargaining:

Accsys expects its suppliers to recognize the freely-exercised right of workers, without distinction, to organize, further and defend their interests and to bargain collectively, as well as to protect those workers from any action or other form of discrimination related to the exercise of their right to organize, to carry out trade union activities and to bargain collectively.

5. Forced or Compulsory Labour:

Access expects its suppliers to prohibit forced or compulsory labour in all its forms.

6. Child Labour:

Accsys expects its suppliers not to employ: (a) children below 14 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.

7. 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 extraction or social origin and such other ground as may be recognized under the national law of the country or countries where the performance, in whole or in part, of a contract takes place.

8. Wages, Working Hours and Other Conditions of Work:

Accsys expects its suppliers to ensure the payment of wages in legal tender, at regular intervals no longer than one month, 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 and other conditions of work provided by suppliers should be not less favourable than the prevailing conditions locally as contained in: (i) collective agreements covering a substantial proportion of employers and workers; (ii) arbitration awards; or (iii) 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.

9. Health and Safety:

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; (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.

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HUMAN RIGHTS:

10. Human Rights:

Access expects its suppliers to support and respect the protection of internationally proclaimed human rights and to ensure that they are not complicit in human rights abuses.

11. 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.

ENVIRONMENT:

13. Environmental:

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

14. 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.

15. 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.

16. Air Emissions:

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

17. Minimize Waste, Maximize 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, maintenance and facility processes, materials substitution, conservation, recycling and re-using materials.

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ETHICAL CONDUCT:

18. Corruption:

Accsys expects its suppliers to adhere to the highest standards of moral and ethical conduct, to respect local laws and not engage in any form of corrupt practices, including but not limited to extortion, fraud, or bribery.

19. 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 the Accsys may have an interest of any kind in the supplier's business or any kind of economic ties with the supplier.

20. Gifts and Hospitality:

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

21. 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.

22. Laws and Regulations:

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

23. 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.

24. Permits:

Access expects its suppliers to hold in place valid permits covering all of its activities as required by law and regulations.

NON-ADHERENCE TO THESE PRINCIPLES WILL BE A FACTOR IN CONSIDERING WHETHER A SUPPLIER IS DEEMED ELIGIBLE TO BE REGISTERED AS AN ACCSYS SUPPLIER OR TO DO BUSINESS WITH ACCSYS, IN ACCORDANCE WITH APPLICABLE ACCSYS' POLICIES AND PROCEDURES.

WE ENCOURAGE ACCSYS' SUPPLIERS TO IMPROVE THEIR BUSINESS PRACTICES IN ACCORDANCE WITH THE PRINCIPLES SET OUT IN THIS CODE OF CONDUCT.

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