



Accelya Anti-Bribery and Corruption Policy

Version 0.3

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Revision History

Version	Date	Amendments	Author	Approver
0.1		First version		
0.2	August 2023	Second version	Laurent Mather	Robert Wilson
0.3	January 2024	Addition of Governance and responsibilities and review	Laurent Mather	ESG Team

Security Classification

Select one	Level	Definition
<input checked="" type="radio"/>	Public	Information that may be broadly distributed without causing damage to the organization, employees and stakeholders.
<input type="radio"/>	Internal	Information that can be distributed within the company.
<input type="radio"/>	Confidential	Sensitive information available within a group of people which must not be disclosed outside the organization without explicit permission of document owner.
<input type="radio"/>	Highly Confidential	Highly sensitive and critical information meant for a limited group which must not be disclosed outside the organization without explicit permission of document owner.



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1. Purpose, Scope and Principles

Purpose:

We are committed to doing business ethically and lawfully and we have zero tolerance to bribery and corruption. We must ensure that neither we, nor any third party acting on our behalf engage in or facilitate any form of bribery or corrupt practices.

This policy sets out the standards of behaviour to which we must all adhere, provides guidance to employees on identifying potential issues and explains where to find guidance.

We have a target of zero bribery or corruption incidents within Accelya annually.

Scope:

The policy applies to all companies within Accelya Group, and to all directors, employees and contractors, to ensure that we comply with all law and regulations governing anti-bribery and corruption in the countries in which we operate.

Principles:

Employees who fail to adhere to this policy, or any other mandatory procedures, will be subject to the appropriate disciplinary action up to and including termination of employment.

Relevant employees will be required to complete training to complement the guidance given in this policy.



2. Governance and allocation of responsibilities

Governance:



ESG Oversight Committee

The ESG Oversight Committee is comprised of the General Counsel and Chief Human Resources Officer. The committee provides guidance and advice to the Senior Leadership Team on Environmental, Social and Governance matters. The committee meets with the wider ESG team on the quarterly basis. This ensures that performance and progress is managed effectively, and urgent matters can be communicated directly to the Senior Leadership Team.

The ESG Team

The ESG team comprises the Head of Environment, Sustainability and Governance (ESG), the Head of Ethics and Compliance and the VP of Diversity, Equity, and Inclusion.

Responsibilities:

The Head of Ethics and Compliance is responsible for the implementation and continuing management of this policy.



3. Bribery and Corruption

Bribery is the act of offering, giving, promising, agreeing, receiving or soliciting something of value, or of an advantage, in order to influence an action or decision in order to gain commercial, contractual or personal advantage.

Bribes can take many forms, for example, money, gifts or excessive hospitality, kickbacks, facilitation payments, political or charitable contributions.

Bribery is illegal and all employees are strictly prohibited from engaging in any form of bribery, whether it be directly, passively or through a third party such as an agent, distributor or other type of intermediary.

Although this policy applies to both the private and public sectors, dealings with public officials can entail particularly high risks. Any payments or an offer of value to a public official with the intent of influencing them in their official capacity is prohibited.



4. Gifts and Hospitality and Facilitation Payments

Gestures of hospitality and goodwill are often a necessary part of maintaining business relationships, and these are permitted provided that:

- they are not made with the intention of obtaining or retaining business, or rewarding a business decision;
- they are not made with the suggestion that a return favour is expected;
- they are of an appropriate type and value and given at an appropriate time;
- they do not include cash or a cash equivalent;
- they comply with any applicable Accelya guidelines.

For further guidance on Gifts and Hospitality please see the Accelya Gifts and Hospitality Policy

Facilitation payments involve payments, usually to a public official, intended to accelerate an administrative process.

These are a form of bribery and are generally prohibited. In the event that refusal to make such a payment may put personal security at risk, the payment may be made but a receipt should be obtained, if the employee deems that it is safe to ask for one.

The incident should be reported to Group Legal and Ethics and Compliance as soon as possible.



5. Third Parties

Accelya may become liable for the actions of people acting on Accelya's behalf, including agents, distributors, suppliers, consultants and other types of intermediary.

The use of third parties in connection with certain business engagements may require a formal due diligence and approval process.

Employees should refer to the Procedure for the Use of Intermediaries for further details and follow this procedure when applicable. In all cases, care should be taken when selecting Third Parties, especially in countries where bribery is commonplace. Corporate documentation should be obtained and reviewed, as well as references from companies with whom the Third Party has worked on a similar type of project.



6. Reporting and Guidance

If you are an Accelya employee you must report any incidence or suspicion or concern relating to bribery or corruption in any part of our business or supply chain to the Head of Ethics and Compliance via ethics@accelya.com . If you are a supplier or third-party provider to Accelya you should inform your primary business contact with us.

Alternatively, employees and all suppliers or partners can report any concerns using the third party, independent whistleblowing process. Please use the following link: accelya@ethicspoint.com

We encourage openness and will support anyone who raises genuine concerns with the company whistleblowing policy, even if they turn out to be mistaken.

Reports are treated in accordance with our whistleblowing policy, acknowledged and acted upon as appropriate.



7. Review

This policy will be reviewed annually by the ESG team and updated to ensure compliance with both legal requirements and best practice.