



Accelya Supplier Code of Conduct

Version 0.2

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Revision History

Version	Date	Amendments	Author	Approver
0.1	August 2023	First version	Laurent Mather	Robert Wilson
0.2	January 2024	Addition of governance and responsibility 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. Introduction

At Accelya we are committed to the highest ethical and legal standards, both for us as an organisation but also across our supply chain.

We have corporate responsibility at the centre of our operations and as a signatory to the United Nations Global Compact we uphold the principles of human rights, anti-corruption, freedom of labour, sustainability and environment.

Our relationship with our suppliers is an integral part of our commitment to trading both ethically and sustainably. We therefore endeavour to extend these standards to all our suppliers and partners. Our Supplier Code of Conduct identifies the mandatory minimum requirements of doing business with Accelya.

All of our suppliers and partners are required to share our commitment to upholding Human Rights and especially to treat people with respect and dignity, to foster a culture of diversity and inclusion within their organisation and to actively promote equal opportunities for all.

We have a zero tolerance approach to Modern Slavery and Child Labour and will not condone, facilitate or tolerate any form of Modern Slavery or Child Labour in our supply chain.

The Supplier Code of Conduct covers:

- Section A – Compliance
- Section B – Ethical and Environmental and Sustainability standards



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 and Head of ESG are responsible for the implementation and continuing management of this policy.



3. Section A: Compliance

All suppliers and partners to Accelya are required:

1. Legal Compliance

- a. to comply, without limitation, to all applicable national and international laws and regulations pertaining to, protection of human rights, health and safety in the workplace, the environment, data protection, international trade compliance including relevant sanctions anti- corruption, money laundering, anti-trust and competition and terrorism.

2. Anti-bribery and Corruption

- a. to have adequate measures in place to manage and reduce the risk of bribery and corruption in its business and supply chains, including the regular training of employees;
- b. to comply with the Accelya Anti-Bribery Policy or to have equivalent principles in place through its own policies.

3. Modern Slavery and Child Labour

- a. to comply with the Accelya Modern Slavery Policy or to have an equivalent policy in place;
- b. to comply with the International Labour Organisation Force Labour Convention and Abolition of Forced Labour Convention;
- c. to comply fully with the International Labour Organisation Minimum Age Convention.

Specifically the supplier or business partner will:

- d. not allow any form of modern slavery, human trafficking or bonded labour
- e. ensure that all work is undertaken without threat of penalty and on a voluntary basis;



- f. not mandate that employees pay deposits or surrender identity documents to the Supplier as a condition of employment;
- g. not employ anyone younger than 15 or the local legal minimum working age, whichever is higher, and in any case younger than the completion age of mandatory education;
- h. if employing people under the age of 18 to ensure that work carried out does not have the potential to be dangerous to physical or mental health, morals or safety;
- i. hold their own suppliers to the same high standards.

4. Human Rights

All of our suppliers and partners are required to share our commitment to upholding Human Rights and especially to treat people with respect and dignity, to foster a culture of diversity and inclusion within their organisation and to actively promote equal opportunities for all.

- a. not to discriminate on the grounds of gender, gender identity, sexual orientation, ethnicity or nationality, religion, marital status, pregnancy, parental status, dependents, age, disability, social class, union membership or educational background;
- b. to treat all employees with dignity and respect;
- c. maintaining a zero tolerance policy to harassment to ensure that no employee or contractor is subjected to bullying, sexual, verbal or psychological harassment or abuse or any behaviour which creates an intimidating, humiliating or offensive work environment;
- d. to allow employees and contractors freedom of association and collective bargaining either through membership of or formation of Trades Unions or Workers Councils;
- e. to comply with local minimum regulations on time off and ensure that overtime is always voluntary and paid at the legally mandated overtime rate;
- f. to provide all employees and contractors with equitable compensation, including wages, benefits, paid leave and working



hours encompassing rest periods which meet the local legal minimum standards.

5. Competition and Anti-trust and Competitor Information

- a. to comply with the Accelya Competition Law Policy, or to have an equivalent policy in place;
- b. to adhere to all laws and regulations pertaining to the protection of competition and prohibiting anti-trust activities;
- c. to respect the principles of free-price setting, not to fix prices or collude with competitors to share the market;
- d. not to participate in a cartel;
- e. to not disclose commercially sensitive information about Accelya;
- f. to not solicit commercially sensitive information about competitors from Accelya.

6. Taxation and Fraud

- a. not to engage in or facilitate any form of tax evasion;
- b. not to facilitate or engage in any activity which could reasonably be construed as designed to perpetuate a fraud.

7. Environment, Health and Safety

- a. to provide all employees and contractors with a safe and healthy working environment;
- b. to have policies and procedures in place to prevent accidents or injuries at work;
- c. to have risk identification and mitigation measures in place;
- d. to have health and safety targets which are measured and reported on;
- e. to provide appropriate training on health and safety issues;
- f. to take all reasonable steps to minimise the impact that the supplier or business partner's activities have on the environment.



8. Supply Chain

- a. to take all reasonable steps to ensure that the principle of the Accelya Supplier Code of Conduct are adhered to by its own suppliers and partners.



4. Section B: Ethical, Environmental and Sustainability standards

1. Environment and Sustainability

At Accelya, we recognize that climate change is one of the greatest challenges of our time. We believe that every employee has a role to play in mitigating the impact of our operations on the environment, and we are committed to taking action on sustainability. We therefore encourage all our suppliers, where appropriate, to:

- a. conserve energy and natural resources, preventing pollution and environmental incidents and promoting sustainable transportation, production and consumption;
- b. reduce scope 1,2 and 3 Greenhouse Gas emissions;
- c. reduce total waste and waste intensity, increase recycling and minimise landfill;
- d. where appropriate suppliers should adopt Science Based Targets to reduce their Scope 1 and Scope 2 Greenhouse Gas emissions and to address Scope 3 emissions in their supply chain. These targets should be aligned with the current guidance from the Science Based Targets initiative (SBTi) and where possible approved by the SBTi.

2. Conflicts of Interest

- a. to have policies in place to avoid conflicts of interest and provide a mechanism for employees to report any potential conflict of interest between them, or any relative, close friend or associates and Accelya.

3. Whistleblowing

- a. to have in place clear and communicated whistleblowing procedures, open to all employees and contractors;



- b. to commit to an open and accountable culture where employees can express concerns without fear of retaliation and safe in the knowledge that they will be treated fairly.

Our own whistleblowing process is open to all our suppliers and third parties should they have a concern. It is provided by an independent third party and concerns can be raised by following this link:

www.accelya.ethicspoint.com



5. Review

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