



Accelya Sustainable Procurement Policy

Version 0.3

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Revision History

Version	Date	Amendments	Author	Approver
0.1	January 2024	First version	Laurent Mather	ESG Team
0.2	January 2025	Minor amendments	Laurent Mather	ESG Team
0.3	January 2026	Minor amendments	Laurent Mather	ESG Team

Security Classification

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Contents

1.	Introduction, Purpose and Scope	4
2.	Governance and allocation of responsibilities	5
3.	Our commitments	6
4.	Review	11



1. Introduction, Purpose and Scope

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 social 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 and we seek to engage with our suppliers and partners to ensure that they share our commitments.

Definition of Sustainable Procurement

Sustainable procurement can be defined as embedding the principles of Corporate Social Responsibility (CSR) into the procurement process whilst still meeting the expectations of our customers.

Purpose:

This policy sets our commitment to sustainable and ethical trade and, along with our Supplier Code of Conduct, represents our approach to ensuring that we source responsibly and sustainably and trade ethically and that we extend our commitment across our supply chain.

Scope:

This Policy applies to all Accelya's trading relationships.



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 VP Strategist, Environment, Sustainability and Governance (ESG), the Global Head of Ethics, Compliance and Health & Safety and the VP of Diversity, Equity, and Inclusion.

Responsibilities:

The Global Head of Ethics, Compliance and Health & Safety and Head of ESG are responsible for the implementation and continuing management of this policy.



3. Our commitments

We expect all our suppliers and partners to share and abide by our commitments to:

1. Upholding the principles of the United Nations Global Compact:

Human Rights

Principle 1: Support and respect the protection of internationally proclaimed human rights; and

Principle 2: Make sure that you are not complicit in human rights abuses.

Labour

Principle 3: Uphold the freedom of association and the effective recognition of the right to collective bargaining;

Principle 4: the elimination of all forms of forced and compulsory labour;

Principle 5: the effective abolition of child labour; and

Principle 6: the elimination of discrimination in respect of employment and occupation.

Environment

Principle 7: Support a precautionary approach to environmental challenges;

Principle 8: undertake initiatives to promote greater environmental responsibility; and

Principle 9: encourage the development and diffusion of environmentally friendly technologies.



Anti-Corruption

Principle 10: Work against corruption in all its forms, including extortion and bribery

2. Modern Slavery and Child Labour

- a. complying with the International Labour Organisation Force Labour Convention and Abolition of Forced Labour Convention;
- b. complying fully with the International Labour Organisation Minimum Age Convention.

3. Human Rights

- 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 harrassment 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.

4. Equal opportunities

We are proud to be an equal opportunity employer and we expect the same of all our suppliers and partners. Employment opportunities should be open to individuals regardless of ethnicity, religion, national origin, sex and sexual orientation, age, marital status, or disability.

This principle extends to all aspects of the employment relationship, including recruitment, training, work assignment, promotion, transfer, termination, and salary administration.

We expect all employees to treat one another with fairness and respect. We expect our supplier and partner to exercise leadership by discouraging prejudice and by role-modelling appropriate behaviour.

5. Diversity and Inclusion

We value diversity and are dedicated to fostering an inclusive culture that attracts, develops, engages, and retains a global talent mix to fuel our growth and competitive advantage.

We believe that by leveraging the unique perspectives and experiences of our employees, we can build a stronger, more innovative, and more successful business that better serves our customers and communities.



6. 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.

7. Environment and Sustainability

- a. conserving energy and natural resources, preventing pollution and environmental incidents and promoting sustainable transportation, production and consumption;
- b. reducing our scope 1,2 and 3 Greenhouse Gas emissions;
- c. reducing total waste and waste intensity, increase recycling and minimise landfill;

8. Whistleblowing

- a. to having clear and communicated whistleblowing procedures, open to all employees and contractors;
- b. to fostering 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 whistleblowing process is open to all employees, contractors, suppliers and third parties should they have a concern. It is provided by an independent third party and can be accessed [here](#)



4. Review

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