



Accelya Code of Conduct

Version 0.3

February 2026

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Revision History

Version	Date	Amendments	Author	Approver
0.1	September 2023	First version	Laurent Mather	Robert Wilson
0.2	February 2025	Addition of Sexual harassment text and Social Media section	Laurent Mather	Robert Wilson
0.3	February 2026	Addition of Money Laundering section and minor amendments to ESG section	Laurent Mather	Robert Wilson

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 principles of honesty, integrity and fairness both as an employer and as we conduct our operations in the marketplace. Our Code of Conduct brings us together to make the right decisions by setting out the expected behaviours to which we must all adhere.

No single document could cover all situations but we must all, as employees of Accelya, ensure that we avoid any action that is illegal, unethical, is in breach of an Accelya policy, causes unauthorised financial commitment or loss, or could in any way damage our reputation anywhere in the world.

We have a whistleblowing policy and service provided by an independent third party where anyone, both within Accelya or externally, can confidentially and safely raise an ethical or illegal activities or behaviours.

By conducting our business in the right way, we earn the trust of our customers, business partners and stakeholders.

It is your responsibility to read and follow our Code of Conduct and to bring it into your daily life and work.

The Code of Conduct will be reviewed annually and updated as required.



2. Governance and allocation of responsibilities



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 a 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 of Environment, Social and Governance (ESG), the Global Head of Ethics, Compliance and Health & Safety and the VP of Diversity, Equity, and Inclusion. All three roles were created in FY23 as part of our commitment to formalize our approach to ESG.



The Code of Conduct is reviewed annually by the Global Head of Ethics, Compliance and Health & Safety who is also responsible for its implementation.



3. Your responsibilities

Who must follow the Code of Conduct?

All of us – all employees, contractors, managers and officers of Accelya.

A breach of the Code of Conduct may result in disciplinary action being taken against you.

What are my responsibilities as a manager?

As a line manager you have additional responsibilities:

- You must be a role model for following our Code of Conduct
- Ensuring your teams have read and understand the Code of Conduct
- Encouraging your teams to speak up if they have any concerns

Where can I find out more?

Electronic and downloadable copies of this document and other policy documents referenced can be found in the 'About Us' section of the Accelya website.

If you have any questions about the content of the Code of Conduct or want to find out more about any of our other policies please contact the Global Head of Ethics, Compliance and Health & Safety.



4. Making a difference – Speak Up

We believe that our people are our best method to detect, and defence against, ethical or legal failures.

We seek to promote an open and honest culture where employees can express their concerns without fear of victimisation or recrimination.

We have partnered with an external and independent third party, Navex Global, who provide a confidential reporting mechanism open to all employees, partners and third parties.

When should you speak up?

It can be difficult to decide what to do, you should ask yourself the following questions:

- Is the activity that you have seen or you have been asked to do legal?
- Could our reputation be damaged anywhere in the world?
- Are you authorised to perform it?
- Could it result in an unauthorised financial commitment or loss
- Does it breach our code of conduct or any of our policies?
- How will the activity affect others?
- How would you feel if your decision to take the action was made public?
- Do you need help or advice?
- Gut feel: does it just not feel right?



What sort of issues should you report?

There are several kinds of issue which you should report, including, but not limited to:

Legal	Ethical	Security	Health & Safety
			
<ul style="list-style-type: none">• Any illegal activity• Regulatory breaches• Fraud or theft• Bribery or corruption• Insider trading	<ul style="list-style-type: none">• Bullying or harassment• Conflicts of interest• Sexual harassment• Working with unethical third parties	<ul style="list-style-type: none">• Information security concerns• Data breaches• Physical security concerns	<ul style="list-style-type: none">• Serious H&S breach• Dangerous working conditions

If in doubt raise it!

If you are an employee and you have a concern you can report it to your manager, local HR or a local senior manager.

You can also report it directly to the Head of Ethics and Compliance.

If you prefer you can report your concern externally to our independent and external reporting service provided by Navex Global either by telephone or via:

- their online web portal www.accelya.ethicspoint.com,
- their smart phone website: www.accelyamobile.ethicspoint.com

You can choose to remain anonymous if you wish and you will not face victimisation if you report, even if you are mistaken, but avoid deliberate misuse.



The whistleblowing process does not replace existing reporting mechanisms for specific areas such as data breaches, data security or sexual harassment but provides another avenues for employees and third parties to raise concerns.

Who can raise a report?

All Accelya employees and contractors

Any third party, globally, can also use the external reporting tool to raise concerns to us, (this enables us to be compliant with the European Union whistleblowing directive).



5. Human Rights and Modern Slavery

Human Rights

At Accelya we are committed to upholding Human Rights and especially to treat people with dignity and respect, to foster a culture of diversity and inclusion, to actively promote equal opportunities for all.

We uphold and are committed to the principles of the United Nations Universal Declaration on Human Rights ([available here](#)).

We demonstrate our commitment to Human Rights as signatories to the United Nations Global Compact, our Human Rights Statement and through our Code of Conduct.

Modern Slavery

Modern Slavery is a crime and a violation of fundamental human rights. It is a term used to encompass slavery, servitude, forced compulsory labour, bonded and child labour and human trafficking, all of which include the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

The latest International Labour Organisation estimates show there were 50 million people living in Modern Slavery in 2021.

We have a zero tolerance policy of any form of slavery or human trafficking and we will take proactive steps to ensure that Modern Slavery is not taking place in any part of our business or supply chains.

We will not engage with organisations which facilitate any form of slavery including the use of child labour or forced labour, or which do not recognise freedom of association or collective bargaining.



We require that the suppliers and third-parties we work with should hold their own suppliers and third-parties to the same standards.

We seek to continually improve awareness of the practices necessary to combat slavery and human trafficking and assess the risk profile of our business in these areas.

Our zero-tolerance approach to Modern Slavery includes our commitment that:

- we will not allow any form of slavery or human trafficking to take place in any part of our business;
- we will not use child labour, nor will we use forced labour;
- we recognise freedom of association by permitting our employees to establish and join organisations of their own choosing without our permission; (unless by doing so they contravene the Conflicts of Interest Policy)
- we will recognise collective bargaining where required by local laws;
- we will comply with all relevant laws, statutes and regulations relating to modern slavery;
- we will publish Modern Slavery Statements in accordance with the relevant legislation;
- we require our suppliers and third-party providers to comply with the above; and to hold their own suppliers and third-parties to the same standards;
- we will seek to educate and raise awareness across our business in the identification and reporting of Modern Slavery.

Reporting:

Employees, suppliers and third-party providers must not engage in, facilitate or fail to report any activity that might lead to, or suggest, a breach of this policy.

If you are an Accelya employee you must report any incidence or suspicion of Modern Slavery and/or human trafficking in any part of our business or supply chain to the Global Head of Ethics, Compliance and Health & Safety. 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.

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.

You can make a report either orally or in writing. There is no required format and proof of your concerns will not be required. However, you should provide as much detail as you can.

If you are an employee you should in the first instance raise your concern with your line manager or local Human Resources team. In the event you do not feel comfortable doing so you can raise your concern to a local senior manager or subject matter expert. Alternatively, you can raise it directly with any of the following:

- General Counsel
- Global Head of Ethics, Compliance and Health & Safety
- Chief Human Resources Officer

If you do not wish to raise your concern internally or you are not an employee you can use our third party, entirely independent, whistleblowing service, provided by Navex Global.

The service is available 24 hours a day, seven days a week, every day of the year and can be accessed through:

- their online web portal www.accelya.ethicspoint.com,



- their smart phone website: www.accelyamobile.ethicspoint.com

or through dedicated telephone numbers for each country in which we operate. Calls will be answered in English but local language operators are available.

You can remain anonymous if you wish.

Reports made through Navex are communicated to the General Counsel and the Global Head of Ethics, Compliance and Health & Safety.



6. People

We are an equal opportunity employer. Employment opportunities are available regardless of ethnicity, religion, national origin, sex and sexual orientation, age, marital status or disability. This principle applies 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. Managers are expected to exercise leadership by discouraging prejudice and by role-modelling appropriate behaviour.

We have a zero tolerance policy to any form of harassment, including any form of behaviour which violates personal dignity, or which creates an intimidating, humiliating or offensive work environment.

Sexual Harassment

We are committed to providing a working environment free from sexual harassment and ensuring all staff are treated, and treat others, with dignity and respect. We recognise that sexual harassment can occur both in and outside the workplace, such as on business trips, or at work-related events or social functions, or on social media.

Sexual harassment or victimisation of any member of staff, or anyone they come into contact with during the course of their work, is unlawful and will not be tolerated. We understand that anyone affected by or involved with a complaint of sexual harassment may feel anxious or upset and care and support will be offered to all those involved.

As an employer we will take reasonable steps to prevent sexual harassment of our staff during the course of their employment. We will take active steps to help prevent the sexual harassment and victimisation of all staff. Anyone who is



a victim of, or witness to, sexual harassment is encouraged to report it in accordance with this policy. This will enable us to take appropriate action and provide support.

Sexual harassment can result in legal liability for both the business and the perpetrator, whether they work for us or are a third party outside of our control. Sexual harassment and victimisation may result in disciplinary action up to and including dismissal.

Diversity and Inclusion

At Accelya we value diversity and are committed to creating 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 can better serve our customers and communities.

Health and Safety

The health and safety of our employees and visitors to our premises is of paramount importance to Accelya we are committed to ensuring that we undertake our business in such a manner that we do not harm the health or safety of our employees or anyone else affected by our activities products or services.

We are committed to complying with all national and international Health and Safety laws and regulations in all countries in which we operate and the Global Head of Ethics, Compliance and Health & Safety in conjunction with the Global Health & Safety Committee ensures that we do so.



7. Anti Bribery & Corruption

We are committed to doing business ethically and lawfully and we have a zero tolerance approach 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.

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.

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 the Global Head of Ethics, Compliance and Health & Safety as soon as possible.

For more information please see the Anti-Bribery and Corruption Policy.

Gifts and Hospitality

Employees are prohibited from offering or accepting gifts or hospitality from any business, persons or government official or office with the intent of influencing a business decision.

- The giving or receiving of gifts and hospitality is generally acceptable where the following requirements are satisfied:
- It is not made with the intention of influencing the recipient to obtain the award or retention of business, or to reward such a decision
- It is not made in the expectation of a return favour



- It is provided in the name of the company, not of an individual
- The value of the gift does not exceed those set out in the Gifts and Hospitality Policy

Conflicts of interest

As an employee of the company you must put the interests of our business first. Many of us will have commitments to, or interests in, organisations outside work that can potentially result in conflicts of interest. You are responsible for recognising a potential conflict of interest and disclosing it to your manager and to Group Legal as soon as you become aware of it.

A conflict, or potential conflict of interest may occur when an employee or their family member has a direct or indirect relationship or interest in a current or proposed business relationship from which the employee or their family member receives, or could appear to be receiving, a financial or other personal benefit.

Please refer to the Accelya Conflicts of Interest policy for more information.

Competition and anti-trust

We are committed to competing for business in an honest and transparent manner.

In so doing we will always comply with competition and anti-trust laws in force in each jurisdiction in which we operate, although these laws will vary from country to country the purpose is always to promote fair competition.

Employees should ensure that they are familiar with regulatory requirements applicable to any public tender or request for proposal.



It is strictly prohibited to engage in any unlawful arrangement with a competitor to fix or coordinate pricing, to allocate customers, or market sectors, or to restrict supply.



8. Environment, Sustainability and Governance

Accelya is committed to sustainability and recognizes the importance of taking action to mitigate the impacts of its operations on the environment. Accelya's approach centres around the effective management of energy consumption, greenhouse gas (GHG) emissions, and waste.

Accelya is committed to the protection of the environment and the prevention of pollution by effective implementation of ISO 14001:2015.

Governance

Support our sustainability efforts and help embed them into every part of our business. This includes following our policies, attending training sessions and engaging with our sustainability team.

Greenhouse Gas Emissions

Accelya is committed to reducing greenhouse gas emissions and its potential impact on climate change. As a business we aim to:

- Maintain and operate a program aimed at the prevention of direct and indirect GHG emissions.
- Review progress and report publicly against our environmental and energy targets on an annual basis.
- Reduce our business travel GHG emissions
- Work with our suppliers to reduce GHG emissions and tackle other environmental impacts in our supply chain.

You can help prevent direct and indirect emissions by using public transport, carpooling, or cycling to work. Consider virtual meetings instead of traveling for business and choose more sustainable options when traveling is necessary.



Work with our suppliers to identify ways to reduce environmental impacts throughout our supply chain.

Resource Conservation

Look to minimize energy and water consumption in our buildings, data centres, and processes by turning off lights and equipment when not in use, using reusable containers, and minimizing paper usage.

Employee Education and Engagement

Take the initiative to learn about your environmental impact and how you can reduce it. Attend training sessions, webinars, and workshops to increase your knowledge of sustainability. Share your knowledge and ideas with your colleagues and empower them to take action too. Participate in our sustainability initiatives and campaigns.

Collaboration and Stakeholder Engagement

Join us in collaborating with our clients and external stakeholders to create solutions that enhance sustainability.

Compliance

Comply with all relevant requirements related to the environment and energy. Report any non-compliance to your manager or our sustainability team.

Continuous Improvement

Look for ways to improve our procedures and performance to achieve our sustainability goals. Share your ideas with our sustainability team and your colleagues.



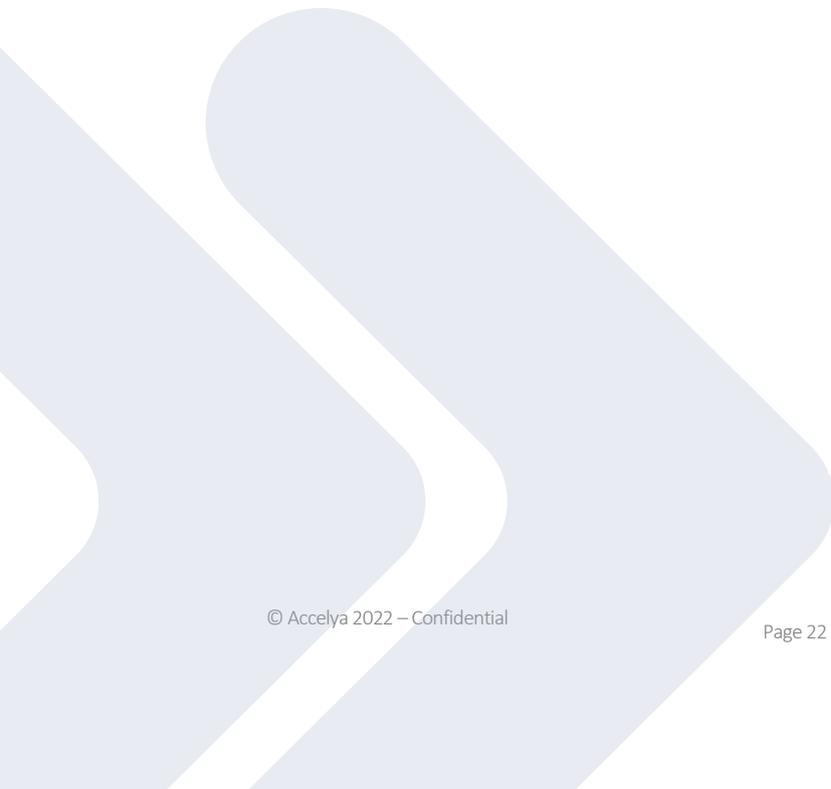
Reporting and Communication

Help us track our progress against our targets by reporting your activities and achievements. Communicate our sustainability policy and progress to your colleagues and stakeholders.

Concerns

If you have any concerns about breaches of our Sustainability Policy, please report them promptly to your manager or our sustainability team.

We believe that by working together, we can make a significant impact on the environment and contribute to a more sustainable future. Let's take action together and make a positive difference.





9. Our Partners

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, 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.

We require all our suppliers and business partners to commit to it or to provide evidence of their own commitment to upholding human rights.

Trade embargoes and Export Control

We are committed to ethical and legal conduct in all of our operations, and this commitment extends to complying with all applicable sanctions administered by the European Union, United Kingdom, and United States, in so far as they apply to our operations.

We require all our directors, officers, and employees, as well as agents, representatives, contractors, and other third parties acting on our behalf of Accelya to become familiar with, and to comply with the Accelya Sanctions Policy and all applicable sanctions.

If you have any questions about your obligations to comply with this policy, or if you suspect that any violation has occurred, you should contact the Head of Ethics and Compliance or the General Counsel.



10. Prevention of Money Laundering and Financing of Terrorism

There is increasing concern in the international community regarding the threat posed by money laundering and the financing of terrorism.

Money laundering is a type of criminal activity that consists of concealing the origin of funds or assets obtained in an unlawful manner, such that those funds or assets appear to have a legitimate source. These criminal activities have serious economic and legal repercussions, because they allow criminals to then legally make use of the profits they have gained from their criminal acts by obscuring the origin of the related funds or assets.

Financing of terrorism consists of providing money that is used to perform terrorist acts, or to pay for costs related to them. Financing of terrorism shares many of the attributes of money laundering, since terrorists use similar channels or methods to hide the source of the funds they have obtained, even though in this case those sources may be either legal or illegal. Because of this, the legal and regulatory system used to prevent and impede the financing of terrorism makes use of the same procedures and measures used to prevent money laundering.

Regulations on money laundering and the financing of terrorism are complex and subject to change at short notice. If in doubt as to whether a particular transaction may be covered by regulation, this should be referred to Finance immediately, and no action taken pending further investigation.

We abide by all national and international money laundering regulations and expect that our employees, suppliers and third-party providers must not engage in, facilitate or fail to report any activity that might lead to, or suggest, a breach of the Accelya Prevention of Money Laundering and Financing of Terrorism policy.



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.



11. Financial Integrity and Tax Compliance

It is essential that all business records, be they used internally, or for external reporting purposes, are truthful, accurate and complete.

All transactions must be properly recorded to allow preparation of clear financial statements in accordance with generally accepted accounting principles.

No false or misleading entries may be made in the company's records and no payment can be made without adequate supporting documentation.

We have a zero tolerance policy to any theft or fraud, however small. By fraud we mean the misuse of company assets by deception or other method, for personal gain or to the detriment of the company.

We will not tolerate any form of tax evasion and are committed to ensuring full compliance with any and all statutory obligations. To this end our employees must not engage in any form of tax evasion, directly or through a third party, and we will comply with all applicable laws and regulations prohibiting tax evasion in so far as they apply to our operations.



12. Data Privacy and Information Security

Data Privacy

We view, collect, store and transfer personal data on a need basis and for business reasons as a data controller with regards to our employees or mostly as a data processor on behalf of our clients.

To protect such data, we put in place appropriate technical and organisational measures.

We expect all our employees, whether they are processing personal data on behalf of other employees or on behalf of our clients, to follow all relevant internal procedures and privacy policy to ensure compliance with global data protections laws worldwide and respect the personal data and privacy they are entrusted with. For more information please refer to the Privacy Policy.

Information Security

Confidential information:

During the course of your daily activities you will have access to information about our business, our customers, partners and vendors. Such information could be commercially sensitive or confidential. We must all do our best to protect the confidentiality of this information and ensure that it is not disclosed to anyone without permission.

If you do need to disclose confidential information as part of your job, you should carry out reasonable due diligence to satisfy yourself that the recipient can be trusted to maintain the confidentiality of the information you have shared with them.



Information systems and information security

As with any business we run on information and each of us is accountable for keeping that information safe. You should abide by the data classification policy which designates that there are four levels of data confidentiality:

- Public – information that may be broadly distributed without causing damage to the organisation, employees and stakeholders
- Internal – Information that can be distributed within the company
- Confidential – Sensitive information available within a group of people which must not be discussed outside the organisation without the explicit permission of the document owner
- Highly Confidential – Highly sensitive and critical information meant of a limited group which must not be disclosed outside the organisation without the explicit permission of the document owner

Working with and sharing confidential or highly confidential information can require specific measures such as encryption and formal third party non-disclosure agreements. If you are in any doubt, assume that the information is confidential and seek guidance from the Information Security team.

You must not use any external cloud services unless there is a business justification and you have obtained approval from Information Security.

Private (i.e. non corporate email accounts) must not be used to store or share company data. You must not use any third party technology services for company business, nor develop your own technology solutions without first obtaining prior approval from the Information Security team. If you are in any doubt please ask.

For more information see the Information Security policy.



13. Company Assets and Intellectual Property

Employees are expected to protect our brand, physical, financial and intellectual assets. Intellectual property, such as copyright, patents and trademarks are corporate assets which generate revenue, and should not be disclosed outside of Accelya except in the context of written agreements.

Employees must observe any intellectual property guidelines issued by Accelya and must not knowingly infringe the intellectual property rights of others.



14. Social Media

The online landscape is ever changing and evolving, presenting you as Accelya employees and contractors with opportunities to communicate and engage with our customers and partners. Social media enables us all to champion Accelya and our products and services through personal expression and direct communication. However this also creates both risks and responsibilities.

You should always assume that anything you do on any social media platform, whether from a business or personal account, could be seen by a colleague, manager, supplier, competitor, investor, the media, customer or potential customer. Therefore any social media activity reflects on Accelya and could have an impact, either positive or negative, on our global brand.

Before posting anything in which you refer to Accelya, your colleagues, our customers or partners, or where you can clearly be identified as an Accelya employee or contractor you should review the Accelya Social Media Policy

If you see anything online which you feel could reflect negatively on Accelya, our customers or partners, please report it to your manager, Group Legal or the Global Head of Ethics, Compliance and Health & Safety.

If you need further guidance on social media in the course of your role please contact the marketing team.