
ANTI-CORRUPTION AND ANTI-MONEY LAUNDERING POLICY



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1. INTRODUCTION

AMS is committed to conducting business in accordance with all applicable laws, rules and regulations and the highest ethical standards, this commitment is embodied in the AMS Code of Business Ethics and Conduct.

The purpose of this policy is to reiterate AMS's commitment to full compliance by the Company, its subsidiaries and affiliates and employees with the Foreign Corrupt Practices Act ("FCPA"), the Organization for Economic Co-operation and Development ("OECD") Anti-Bribery Convention and any local anti-bribery and corruption laws that may be applicable. This policy supplements the Code of Business Ethics and Conduct and all applicable laws and provides guidelines for compliance with FCPA, OECD and Company policies applicable to AMS operations in countries where we operate in and it is not intended to replace any local laws.

2. SCOPE

This policy applies to all AMS employees, contractors, and suppliers.

3. OUR COMPANY

3.1. Anti-Corruption

Corruption is the misuse of public power for private profit, or the misuse of entrusted power for private gain. Bribery is offering payment of cash, gifts, or even excessive entertainment, or an inducement of any kind offered or given to a person in a position of trust to influence that person's views or conduct or to obtain an improper advantage. Bribery and corruption can take many forms, including the provision or acceptance of:

- Cash Payments;
- Kickbacks;
- Political contributions;
- Charitable contributions;
- Social benefits; or
- Gifts, travel, hospitality, and entertainment.

Facilitation Payments

Facilitation payments are a form of bribery made with the purpose of expediting or facilitating the performance by a public official for a routine government action and not to obtain or retain business for any other improper advantage. Facilitation payments are more likely to be of a small value and paid to lower level officials to obtain an increased level of service which one would normally be entitled to, for example speeding up a visa application process.

AMS has a zero-tolerance approach regarding facilitation payments.

Kickbacks and Undocumented Cash Payments

AMS employees and third-party affiliates are prohibited from engaging in kickbacks. A kickback is any payment, not reflected on the face of a business contract that is required to be made to a Government Agency, a Government Official, or a private individual to conclude the business agreement at issue.

Protection Money

In some instances, protection money may be solicited. This is a kind of extortion which often involve physical threats. AMS will not engage in such affairs and see it as our obligation to protect all employees or partner. Any such incidents should be reported to the Compliance Department immediately. In certain situations, such threats might lead to a cessation of business.



Political and Charitable Contributions and Sponsorships

AMS does not grant financial or other support to political parties or political campaign efforts, as this can be perceived as an attempt to gain an improper business advantage. We encourage our employees to use their personal rights to participate in political and democratic processes.

As a Company, we do not make donations (whether in cash or kind) in support of any political parties or their candidates. This type of donation can be seen in some areas as an attempt to gain an improper business advantage and goes against our Code of Business Ethics and Conduct.

AMS prides itself as a Company on the Charitable support and donations we offer to our local partners and the wider community whether this contribution is offered in the form of services, knowledge, time, or occasional direct financial contributions. However, employees must be vigilant to ensure these contributions are not used to conceal bribery or any illicit payments. As a Company, we will only make charitable donations that are legal and ethical under local laws. No donations or assistance must be offered or made without the prior approval of Senior Management.

All charitable gifts and activities should be recorded, noted and be available for public disclosure if required.

3.2. Gifts and Entertainment

It is the policy of AMS to base all commercial decision solely on commercial criteria. This policy serves the Company's business interests and fosters constructive relationships with organizations and individuals doing business, or seeking to do business, with AMS. In many cultures, those constructive relationships may include incidental business gifts and entertainment. AMS employees and third parties acting on behalf of the Company providing or receiving third party gifts and entertainment in their corporate capacities are expected to exercise good judgement in each case, considering pertinent circumstances, including the character of the gift or entertainment, its purpose, its appearance, the position of the persons providing and receiving the gift or entertainment, the business context, reciprocity, and applicable laws and social norms. Gifts and entertainment must not be intended to create an improper advantage for AMS.

All expenditures for gifts and entertainment provided by AMS must be accurately recorded in the books of records of the Company.

Gifts, Entertainment, and Hosting of Government Officials

It is acceptable under the anti-corruption laws to have reasonable, customary interaction with Government Officials in the form of gifts, entertainment, and hosting of business meetings. However, any proposal to provide a gift to a Government Official, pay for a meal or entertainment for a Government Official, or pay for a Government Official's travel, transportation or hotel expenses is subject to the approval and endorsement of the Senior Management. All employees should get prior approval in writing upon engaging in such activities.

The laws of an official's country will, in many cases, contain provisions that govern the payment or reimbursement of expenses incurred by the official. Even where the local laws permit the Company to pay an official's expenses, there may be legal requirements applicable to the handling, accounting, and reporting of such payment. Those local laws must be considered when planning Company-paid travel, or entertainment for Government Officials.

The following are some example of interactions in the category of gifts, entertainment, and hosting that should be carefully reviewed in advance:

- The Company plans to pay for a Government Official to attend training program or industry conference in a country outside of his home country.
- An operating affiliate wants to provide a gift to a Government Official with whom the affiliate has regular dealings.
- A high-level Government Official requests assistance in arranging medical treatment
- A Company manager plans to invite a Government Official and spouse to a sporting event or dinner.
- The Company is hosting an operating committee meeting outside of its home country and paying for travel and lodging for several Government Officials to attend. There is entertainment planned after the business meeting.
- A Government Official requests transportation in a Company-owned vehicle.



Gifts, Entertainment, and Hosting of Commercial Parties

It is also acceptable under the anti-corruption laws to have reasonable and customary interaction with commercial parties in the form of gifts, entertainment, and hosting business meetings. All such activities by Company employees are subject to the approval and endorsement of Senior Management. All employees should get prior approval in writing before engaging in such activities.

The following are some examples of interactions with commercial parties in the category of gifts, entertainment, and hosting that should be carefully reviewed in advance:

- The Company plans to pay for overnight accommodations for the prospective customers.
- A business partner requests reimbursement of travel expenses for himself and his family.
- An employee plans to provide unusual or costly entertainment.
- A business partner is invited to travel in Company-owned vehicles.

3.3. Anti-Money Laundering

Money laundering is the concealment of the origins of illegally obtained money, typically by means of transfers involving foreign banks or legitimate businesses.

AMS is committed to complying fully with anti-money laundering laws throughout the world. We will conduct business only with reputable customers, involved in legitimate business activities with funds derived from legitimate sources.

We will neither engage into nor tolerate any arrangement which facilitates or appears to be used to facilitate any acquisition, retention, use or control of any money payments intended to disguise the proceeds of crime. Every employee must collect and understand documentation about perceptive customers and business partners to ensure that they are involved in lawful business activities and their funds are of lawful origin. Reasonable steps must be taken to prevent and detect unacceptable and suspicious forms of payment.

3.4. Training and Awareness

All employees must familiarize themselves with this policy and have a full understanding. Line Managers are advised to seek guidance from Human Resources and/or Compliance Department (as and when required) with regards to the proper evaluation and necessary steps in addressing Anti-Corruption and Anti-Money Laundering effectively.

3.5. Reporting Potential Misconduct / Non-Retaliation

AMS encourages its employees to report known and suspected business violation through channels set out in the Code of Business Ethics and Conduct without fear of retaliation. Employees are advised to discuss any compliance concerns with their immediate manager, and that if matters are not being properly addressed at their manager's level, they should request further reviews. Reviews should continue to the level of Senior Management appropriate to resolve the issue.

3.6. Compliance with this Policy

If there is anything in this policy that you do not understand, please contact the Business Administration Department at amsba@ams.global. Please note that this policy, and any related documents, may be reviewed or changed at any time.