
CODE OF BUSINESS ETHICS AND CONDUCT



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1. INTRODUCTION

AMS is committed to ensuring that all aspects of our business are conducted according to rigorous ethical, professional and legal standards. The Company accepts that it has a moral obligation to act as a responsible corporate citizen in all jurisdictions. Our values guide our actions in conducting business in a socially responsible and ethical manner and distinguish AMS in the eyes of our stakeholders. As a corporation and as individuals, we respect the law, support universal human rights, protect the environment, achieve operational excellence and benefit the communities where we work.

AMS' Code of Business Ethics and Conduct is built on our core values of a Can Do Attitude, Integrity, Innovative Thinking, Initiative, Ownership, Respect and Teamwork which outline the principles that guide our business conduct. Our ethical standards and shared moral values form the cornerstone of our ethos of uncompromising integrity, accountability and professionalism, which go hand in hand when earning the trust and respect of those we serve.

These principles, together with applicable laws, support full compliance. They also represent the practical ways that we put our values to work every day, however, the Code cannot address every possible workplace situation or list all of AMS' corporate policies and procedures, but should be used as a guidance tool for our ethical standards and where our employees take their questions or concerns.

Honest, ethical behavior is the standard that we expect from our directors, officers, other executives, employees and business partners. AMS does not tolerate behavior that does not meet this standard. Any employee violating these standards will be subject to disciplinary action by the Company.

This Code of Business Ethics and Conduct is an integral part of the Company's Compliance Program, which is directed at ensuring compliance with the myriad rules, regulations and laws that apply to AMS as a Government contractor and as a private Company.

The Code of Business Ethics and Conduct sets forth the standards that guide our every action at AMS, and applies to all employees.

2. SCOPE

This Code of Business Ethics and Conduct Policy applies to all our colleagues; by this we mean all stakeholders, employees, contractors, consultants and agency workers in all the countries in which AMS operates. It relates to all activities which take place on AMS premises, or are connected to the workplace, during any employment related duties or activities, including conferences, training sessions, travel and social functions.

3. OUR COMPANY

AMS Code of Business Ethics and Conduct ("our Code") seeks to ensure integrity and transparency in the conduct of our business and in our relationships with others.

3.1. AMS Vision, Mission, and Core Values

Vision

To be the leading provider of client solutions while positively impacting the people and communities in which we operate.

Mission

To deliver mission success and organic capability through innovation, technology and people solutions.



Core Values

AMS is committed to accountability, quality, transparency and professionalism across our industry.

- Can Do Attitude
- Integrity
- Innovative Thinking
- Initiative
- Ownership
- Respect
- Teamwork

3.2. Administering and Enforcing our Code

All employees are accountable for compliance with the provisions of this Code and are expected to raise questions if they are concerned that the standards of this Code are not being met. Violations of this Code can result in disciplinary action up to and including termination of employment. If appropriate, we will report misconduct to the proper authorities, which may lead to civil liability and/or criminal prosecution.

Managers and supervisors must be particularly careful with their words and conduct to avoid placing, or seeming to place, pressure on subordinates that could cause them to perform in a way that is contrary to the ethical standards set forth in this Code and in AMS policies. Our Code is not meant to be a collection of all rules and it cannot cover every situation. It is designed to help us use our judgement and common sense to make the right decisions. When in doubt, we should always seek guidance on the proper course of action from our Manager, Compliance Department or Human Resources Department.

3.3. Compliance and Responsibilities

Employees are placed in a position of trust. They manage Company resources, have access to Company information and make decisions that affect the interests of others. AMS is a Company that stresses both corporate and personal integrity. We not only comply with laws and applicable regulations; but we also strive to conduct our affairs according to the highest ethical standards. AMS employees are expected to be honest and forthright in dealings with managers, subordinates and with one another as well as with clients, suppliers, Government agencies and their employees, business partners and the general public. AMS employees must maintain the highest level of personal integrity and encourage it in others; they must not lie, cheat, steal or do anything that would bring dishonor upon themselves or the Company. All employees are responsible for:

- Reading the Code of Business Ethics and Conduct.
- Understanding the requirements stated in the Code;
- Utilizing available resources to resolve questions or issues, and
- Complying fully with the code and with the Company's policies and procedures.

AMS acts with due care before engaging with a business partner to ensure that all business partners and subsidiaries know and respect our Code of Business Ethics and Conduct. All business partners will receive written information about our Code. We expect any third party we do business with to respect our values and high ethical standards of conduct. We will make all reasonable efforts to make them aware of our expectations under our Code and encourage them to adopt principles and practices that are comparable with our own.

3.4. Compliance with Applicable Laws and Regulations

AMS and its employees must obey all applicable and relevant laws that affect the business. Such laws include, without limitation, those that apply to procurement integrity, securities, fraudulent conduct, workplace behavior, anti-trust, civil rights and anti-discrimination, copyright protection, campaign finance and taxation. While the Company does not expect its employees to be experts in legal matters, it holds each employee responsible for being familiar with the laws governing their area of responsibility and to be generally aware of possible legal issues and exposures or threatened litigation. Employees should seek immediate advice from the Company counsel whenever they have a question concerning any application of the law. From time to time, as appropriate and necessary, the Company counsel may prepare guidance on legal and regulatory issues and circulate any such guidance to the appropriate management and affected employees.



As a Government contractor, the Company is subject to many rules and regulations. The Company and its employees have a duty to comply with such applicable rules and regulations including, without limitation, the Federal Acquisition Regulation (FAR); and other rules and regulations governing accounting, timekeeping, workplace behavior, safety, drug-free workforce, gratuities and conflict of interest. Compliance with all host nations applicable laws and regulations must never be compromised. Additionally, employees shall adhere to internal rules and regulations as they apply in any given situation. There will be internal regulations that are specific to the Company and may go beyond what is required by law in countries where we operate.

3.5. Corporate Ethical Standards and Respect for Human Rights

AMS is committed to ensuring that business is conducted in all respects according to rigorous ethical, professional and legal standards which includes the protection and advancement of human rights. The Company accepts that it has a moral obligation to act as a responsible corporate citizen in all jurisdictions.

AMS strives to enhance the communities in which we operate. We respect and care for the people within these communities and take responsibility for the effects of our presence in these environments. Honesty and integrity in communications is regarded as the key pillar in establishing the Company's reputation as a credible and trustworthy member of the international business community. On this basis, AMS operates by communicating openly whether with shareholders, Government departments or agencies, the local community, employees, customers or suppliers.

3.6. Corporate Sustainability

Ethical and Economical Sustainability

We have a passion for what we do; our work is a constant journey towards making positive change amongst the businesses and people we touch. At AMS, our ethos is equality and efficiency, with sustainable objectives based on strict observance of ethical and moral standards, and our responsibilities to stakeholders, including clients, employees, the local communities and the environment within which we operate. We focus on bringing value and long-term sustainability to local economies by sourcing locally and employing local nationals wherever possible.

Environmental Sustainability

We consider the environment during every step of our operations, AMS is committed to conducting business in a responsible and environmentally sustainable manner. Throughout our global operations, we regard compliance with local legislations as the absolute minimum standard to be achieved. We recognize that our operations and actions have direct and indirect environmental impact and always seek additional methods in which we can go beyond compliance to find effective means of reducing any negative environmental impact.

Community Sustainability

AMS strives to be an organization that serves customers, employees and the communities in which we operate in thus ensuring their future prosperity and social integration. We exist because of them and we thrive because we continually provide a high level of value to them.

AMS sets the bar high for the quality of our work and strives to exceed client expectations. We also believe that it is important to serve society as a whole. AMS maintains an active role within local communities and encourages life skill development and capacity building training programs in order to support social equity, wellbeing, lifestyle and personal growth. As a Company we invest time, money and other resources to selected charitable causes as well as provide support with humanitarian relief in times of natural disasters.

Employee Care

People are the most important resource at AMS. We promote and nurture a culture in which each employee knows they are valued and respected. As an equal opportunity, employer we recruit the right people from the start. AMS will ensure that these people have high personal integrity, intelligence, a strong work ethic, a positive attitude and substantive expertise. Our employees come from varied cultural, economic, ethnic and religious backgrounds. They represent all ages, genders, races and orientations.



Duty of care to our employees is an integral part of our business. AMS cares about its people and we expect AMS employees to care about one another, our clients and the Company. We treat every person with dignity and respect, regardless of their position. We will not tolerate harassment of any kind. AMS emphasizes teamwork, working together in harmony to achieve corporate goals. We encourage managers and individual employees to have open communications and to be receptive to dissenting opinions. AMS employees are encouraged to be honest, courteous, friendly and helpful.

3.7. Report Violations

Every employee has a duty to report suspected non-compliance with applicable rules and regulations. Reports will be investigated promptly, with due respect for the rights and privacy of all who may be involved.

Violation of this Code will not be tolerated. Any employee who violates the standard in the Code may be subject to disciplinary action. More details are outlined in the Disciplinary Policy.

We aim to encourage openness and will support anyone who raises a genuine concern in good faith, even if they turn out to be mistaken.

3.8. Protection from Retaliation

Our Company prohibits retaliation against any employee who honestly makes a good faith report of a potential violation of our Code of Business Ethics and Conduct, our policies, or the law. The Company will take disciplinary action, against anyone who participates in an act of retaliation.

4. OUR CONDUCT

4.1. Financial Responsibility

AMS as a Company and a government contractor are subject to numerous policies and procedures that govern the way the Company conducts business. The policies that regulate employees' wages and hours are designed to ensure that employees are paid, as specified, within these policies.

Report Financial Condition and Results of Operations Fairly and Honestly

Company books and records must be kept in accordance with generally accepted accounting principles, government regulatory requirements, and established finance and accounting policies. All reports submitted to government authorities and to shareholders must be made accurately, timely and in compliance with all applicable laws and regulations. All employees must cooperate fully with internal and external auditors during their examinations of Company books, records and operations. In the interests of Anti-Bribery and Anti-Corruption, all financial transactions must be carried out and recorded in a clear and transparent manner.

Bill for Service in a Timely and Accurate Manner

The Company is committed to accurate and timely billing for all services provided to commercial clients or government agencies. AMS will bill only for services provided, directly or under contract, according to the requirements of the government or commercial clients, consistent with industry practice and in accordance with Company policies and procedures.

The Company and its employees must never submit any false or misleading information on any bills or claim forms, and no employee can ever engage in any conduct or arrangement that results in these prohibited acts. Any employee making a false statement on any bill or claim form will be subject to disciplinary action by the Company.

4.2. Comply with AMS System of Internal Controls

AMS must maintain an effective system of internal controls. It is imperative that each employee understands their role in complying with, and monitoring compliance with all relevant Company policies and procedures.



It is the responsibility of the Company to ensure everything is properly accounted for, for example costs including labor, travel, material and other costs. These costs include, but are not limited to normal contract work, work related to independent research development and bid and proposal activities.

Any falsification or misrepresentation of time and attendance or information may result in disciplinary action, up to and including termination. No employee may knowingly charge an incorrect amount or knowingly approve such mischarging. Shifting cost to an improper account is also prohibited.

4.3. Using Company Assets

In general, personal use of supplies, equipment or premises belonging to the Company is prohibited, unless prior permission is received from the appropriate level of management. Every employee is responsible for safeguarding assets under their control and to be responsible for properly using and protecting the Company and customer's property. This includes electronic communication systems, information resources, materials, facilities, and equipment.

We must protect our Company and customer's assets, including its commercial technologies. Employees may use Company and customer's assets, funds, and business opportunities only to conduct legitimate Company business and for other properly authorized purposes.

4.4. Sensitive Information

Confidential and Proprietary Information

Every employee must protect Company proprietary information against improper use and access. Confidential or proprietary information must not be revealed outside the context of official duties unless prior written approval from Executive Management is received. The employee should safeguard the Company's confidential and proprietary information both during and after the term of a contract or engagement. All information should be used only for valid business purposes and not to provide personal gain for themselves or others.

Our confidential business information includes our trade secrets and competitive information. In general, our Company also owns all intellectual property, work processes, research, and improvements that we develop while performing our jobs. AMS employees cannot use this knowledge for personal gain or in other employment outside of our Company (including future employment) without written permission from Company's Executive Management.

Confidentiality and Intellectual Property

In the course of their employment, employees will be exposed to the Company's confidential information. "Confidential information" means information or materials that is commercially valuable to the Company and not generally known or readily ascertainable in the industry. This includes, but is not limited to:

- Technical information concerning Company's products and services, including product knowledge, formulas, designs, devices, diagrams, software code, test results, processes, research projects and product development, technical memoranda, and correspondence;
- Information concerning Company's business, including cost information, profits, sales information, accounting and unpublished financial information, business plans, markets and marketing methods, customer lists and customer information, purchasing techniques, supplier lists and supplier information and advertising strategies;
- Information concerning Company's employees, including salaries, strengths, weaknesses, and skills;
- Information submitted by Company's customers, suppliers, employees, consultants or co-venture partners with Company for study, evaluation or use; and
- Any other information not generally known to the public which, if misused or disclosed, could reasonably be expected to adversely affect Company's business.



Employees shall keep the Company's confidential information, whether prepared or developed by the employee, in the strictest confidence. Employees may not disclose such information to anyone outside the Company without Company's prior written consent. Nor will any employee make use of any confidential information for the employee's own purposes or the benefit of anyone other than Company.

When an employee's employment with the Company ends, for whatever reason, the employee will promptly return to the Company all original and copies of all documents, records, software programs, media and other materials containing any Confidential Information. The employee will also be required to return all equipment, files, software programs and other personal property belonging to the Company.

The employee's obligation to maintain the confidentiality and security of Confidential Information remains even after employee's employment with Company ends and continues for so long as such Confidential Information remains a trade secret, not being lower than 24 months in any case.

4.5. Records Management and Retention

Documents and other records must be retained in accordance with the requirements of the law, governing contracts, and Company policies. Documents that are in any way related to an ongoing or potential investigation of the Company by any government agency must be protected and cannot be destroyed unless and until any such investigation is ended. AMS corporate records and documents shall not be removed from Company premises or used for personal gain or benefit.

The Company's records document retention policy and schedule will mandate the minimum and maximum periods that we may retain electronic and physical documents, material, and data, subject to any special instructions given by Business Administration Department (BA) or respective Project Management Office (PMO) for document preservation.

4.6. Mandatory Disclosure

All employees must disclose in a timely manner, all violations of Government criminal law involving fraud, bribery, or gratuity violations potentially affecting any contract the Company is working on.

The Compliance Department will review all such disclosures, and when warranted, report to the relevant Federal awarding agency. Failure to make required disclosure can result in disciplinary action.

4.7. Responding to Audit, Investigations and Corrective Action

Employees are required to fully cooperate with all audits and investigations and corrective actions whether internal or external. Employees must never destroy or alter any documents or electronic records, mislead an auditor or investigator or obstruct the collection of information relating to an audit or any legal action brought on behalf of, or against, the Company. To the greatest extent possible, we will cooperate with government agencies who are conducting audits or investigations.

4.8. Business Courtesies

Gratuities, Gifts and Entertainment

Employees may provide or receive gratuities, gifts and entertainment only if they are:

- Reasonably related to a clear business or charitable purpose;
- Of a reputable nature;
- Customary in the normal course of business; and
- In full compliance with all laws that apply, our policies, and the policies of the organization employing the third-party giver or recipient.



Employees may never provide or receive any gratuities, gifts and entertainment or a series of gratuities, gifts and entertainment that carries a perception of influence or obligation for the giver or recipient.

Employees may only provide entertainment, travel, gifts, or charitable donations if they are:

- Permissible under applicable laws;
- Reasonable and bona fide expenses related to marketing, contracting, or charitable activities;
- Properly documented and accurately, promptly, and separately (not aggregated with other expenses) submitted through AMS's normal procedures for recording or reimbursing similar expenditures;
- Properly pre-approved if they either exceed the monetary thresholds established under our policies or, regardless of value, if they are related to charitable causes; and
- Whenever possible, purchased directly from the suppliers selling the entertainment, travel, gift, or items for donation—rather than allowing the third-party recipient to pay any supplier and request reimbursement.

Our Company strictly prohibits receiving or providing gratuities, gifts and entertainment that violates any applicable law (such as the anti-bribery laws of the United States and other countries). Employees may not provide gratuities, gifts and entertainment using their own money, if it could create an appearance of a bribe, kickback, or attempt to influence the decision of the recipient.

4.9. Conflict of Interest

Employees should avoid any actual, potential or the appearance of conflict of interest situations. Employees should not offer their skills or services to competitors or potential competitors, or engage in outside businesses that compete with or sell goods or services that are competitive with AMS.

Personal Conflict of Interest

The potential for a conflict of interest exists when an individual's position with the Company presents an opportunity for personal gain apart from the normal benefits of employment and compensation provided by AMS. Employees should not recommend or place business with any firm owned or controlled by an employee or their family without first obtaining the written consent of Executive Management. In addition, employees should not act as a consultant to a supplier, client or competitor of the Company or be employed by them or take money from them. An employee having any interest, direct or indirect in any supplier, client, competitor, or franchisee of the Company should make prompt disclosure to the Company and seek to obtain approval from Executive Management.

Employees shall avoid conflicts of interest whenever possible. If a Conflict of Interest situation has occurred or if an employee faces a situation that may involve or lead to a Conflict of Interest, the employee shall disclose it to their respective Line Manager and/or the Human Resources or Compliance Department to resolve the situation in a fair and transparent manner.

Organizational Conflict of Interest

An organizational conflict of interest exists when the nature of the work to be performed under a contract may give a client or supplier an unfair competitive advantage and when a client or supplier has other interests that may impair its objectivity or ability to render impartial assistance or advice to provide objectivity in performing the contract work.

As part of AMS's ethical standards, each employee with the assistance of their Line Managers, must attempt to identify organizational conflicts of interest so that they may be avoided, neutralized, or mitigated.



4.10. Accurate Business Records

Company records must accurately reflect and be a fair representation of the activity they record in accordance with the Company policies and in a manner that will reflect the nature and purpose of the activity. Thus, all official records of the conduct of the Company must be honest, complete, and accurately reflect all transactions to fully satisfy applicable legal requirements, including the Foreign Corrupt Practices Act (FCPA) of 1997, False Claims Act (FCA) and other related laws. This means the accuracy of any records involves both factual documentation and ethical evaluation.

We must never make any false or artificial entries in our books and records. In addition, when preparing audited accounts, we should cooperate with the AMS authorized auditors at all times. Under no circumstances should any employee manipulate, mislead, or fraudulently influence the external auditors in such a manner as to affect their opinion of our Company's account.

If employees have reason to believe that any of the Company's books or records are being maintained in a fraudulent, inaccurate or incomplete manner, or if they feel pressured to prepare, alter, or destroy documents in violation of Company policy, or they have noticed any unusual transactions or behavior that may be a sign that fraudulent behavior is occurring, please report them through the AMS Hotline.

4.11. Everyone is Involved

To ensure we all live by our values and comply with the obligations set forth in our Code, AMS is committed to:

- Building and fostering a corporate culture of integrity;
- Creating appropriate awareness of our Code at all levels;
- Setting up measures to prevent, detect and respond to unethical or non-compliant behavior; and
- Providing globally available support, information and resources to assist in the application of our Code; and Continuously improving our corporate governance standards.

Complying with our Code and its underlying policies and standard operating procedures is part of the terms and conditions of our employment with AMS. Our Code is continuously updated to reflect changes in laws, policies and best practice.

5. OUR WORK ENVIRONMENT

AMS is committed to maintaining the maximum standards of safety and employee protection. We each have a responsibility to meet this commitment by following all Company safety and security procedures, as well as the laws and regulations applicable in all countries where we operate.

5.1. Security

AMS is committed to protect our employees, customers, operations, and assets in the countries where we operate. Our facilities must be secured appropriately, and we must take any action required to mitigate threats to employee safety in our workplace.

We properly safeguard all classified material and other information entrusted to us. Most importantly, employees must immediately report all suspicious activity or any potential violations that threaten the Company's security.

5.2. Employment and Human Resources

AMS provides equal opportunities and advancement opportunities to all qualified persons based on merit. We will not discriminate on the basis of race, color, religion, gender, sexual orientation, pregnancy, age, marital status, national origin, citizenship status, genetic information, military service, veteran's status or any other characteristic protected by applicable law. We will never tolerate ethnic, racial, religious, physical, sexual, or any other type of harassment in any form.

Employees must comply with our Human Resources policies and all applicable employment and labor laws.



Obtain All Necessary Licenses, Permits, Certifications and Credentials

AMS obtains and maintains all required operating and business licenses and permits, as well as all applicable certifications and accreditations. Employees, vendors and contractors must obtain and maintain all appropriate licensure or certifications required for their job responsibilities or contracts.

Hire Authorized Individuals and Comply with All Immigration Regulations

AMS will hire only those individuals who are authorized to work in the country of operations and comply with regulations in accordance with the host and home country immigration legislation. AMS complies with all regulations with respect to the employment of minors and the Combatting Trafficking in Persons regulations.

Hiring of Former and Current Government Employee

AMS complies with all legal requirements regarding the recruitment and hiring of past and current government employees and elected officials, including members of their immediate families. Whether the Company wants to retain someone as an employee or a consultant, laws restrict what may be discussed with these people, when such discussion can occur, when government employees can be hired, and type of work they may do for AMS. AMS employees must obtain prior clearance from Human Resources before discussing possible employment or consulting or making offers to hire former or current government employees or their family members.

Prohibition in Hiring of Person Convicted of Fraud or Other Defense-Contract Felonies

Federal law prohibits individuals with certain criminal convictions, government debarments or professional disqualifications from engaging in business. The Company does not contract with, employ, or bill for services rendered by an individual or entity that is suspended or debarred from federal government contracts; or convicted of a felony involving fraud, embezzlement, forgery, bribery, theft, dishonesty, or breach of trust.

5.3. Discrimination and Harassment

AMS will not tolerate unlawful discrimination and harassment in the workplace and will make every reasonable effort to prevent and eliminate conduct which falls within the scope of this policy.

AMS is a global employer with a diverse workforce subject to differing customs and legal standards, this policy applies to all employees in all countries where we operate. Discrimination and harassment include, but is not limited to: racist, sexist, ethnic, or other inappropriate comments, jokes, gestures, or any action or statement that demeans individuals or creates an intimidating or offensive work environment. AMS treats everyone with dignity and respect.

5.4. Health, Safety and Environment

AMS is committed to protecting human health and the environment. This commitment requires that we integrate employee health and safety and environmental consideration into all aspects of our facilities, operations, and processes. It further requires that we operate in a manner that is environmentally responsible and that ensures the protection of the health and safety of our employees and the environment. We make every effort to recognize and respond to community and employee concerns about these issues.

Employees are responsible for conducting their work activities in a safe and environmentally responsible manner and for bringing to management's attention any actual or potentially dangerous condition.

Particular attention should be paid to the disposal of waste materials, erosion control and discharges into the air, soil, or water. Federal, state and local environmental laws and regulations govern these matters and it is essential that AMS employees become familiar with those laws and regulations as they relate to their work and to assure that the laws and regulations are followed.



5.5. Drug and Smoke Free Workplace

Drug-Free Workplace

AMS complies with the Drug-free Workplace Act of 1988.

AMS expects all of its employee to report to work free from the influence of illegal drugs and alcohol. AMS strictly prohibits the use, abuse, sale, purchase, possession, manufacture, or distribution of any intoxicating or illicit substance in the AMS workplace, on Company owned or leased premises, or while representing the Company at any time. In addition, employees must conform to the laws and customs of the country in which they are located, unless the specific contract under which they are working requires a more restrictive policy, in which case the more restrictive policy is followed.

Smoke-free Workplace

Occupational health and safety states that AMS has an obligation to provide a safe working environment for all employees. AMS is committed to ensuring that all employees are safe from injury and risk to health while they work.

To protect all workers from exposure to second-hand smoke, smoking is prohibited within the confines of all AMS buildings and vehicles. Smoking is not permitted in private vehicles when transporting people on authorized AMS business. Smoking is only permitted in designated areas.

6. OUR OPERATIONS

6.1. Antitrust and Competing Fairly

All employees must comply with all applicable anti-trust and competition laws. Employees may not engage in any direct or indirect conduct with competitors to establish prices or bidding practices, divide markets, refuse to deal with a particular customer, or otherwise agree about the nature, extent, or means of competition in any market for goods or services.

AMS is committed to competing in the marketplace on the basis of price, quality and performance. We build our relationships on trust and an honest and ethical exchange of information.

We are defined by our reputation in our industry. Competing unethically, even if not prohibited by law, harms our reputation. When we compete based on price, quality, and performance, we uphold high ethical business standards.

Similarly, we encourage fair and open competition among our suppliers. Employees must follow our policies requiring competitive bidding among our suppliers. This improves the price, quality, and performance of the goods and services that we purchase. A fair and open bidding process also reduces fraud, corruption, and other activities that could harm our Company.

Deal Honestly and Fairly with Clients, Suppliers, Vendors, Contractors and Financial Partners

The long-term success of the Company depends upon establishing mutually beneficial relationships. While the law requires that we fulfil obligations written into contracts and agreements, we will always also be fair, ethical and consistent in all business dealings.

Conduct Marketing and Advertising Activities Fairly, Honestly and Accurately

The Company may use marketing and advertising activities to educate investors and the public. This may include; providing information to proposed clients, increasing awareness of our services and business offerings, and recruiting new employees. The Company is committed to representing its services and offerings fairly, honestly and accurately. Advertising, marketing and promotional materials will not contain unfair, inaccurate or deceptive statements or exaggerated or unwarranted representations. Employees may not use any advertising, marketing or promotional materials that unfairly describe the services of the Company or a competitor or make disparaging comments or innuendo.



6.2. Anti-Bribery and Anti-Corruption

A bribe is a form of illegal payment either by cash, goods or services given to an individual or group to ensure a favorable outcome or change a decision that may not have been the original intention of the person receiving the bribe. Bribes can take many forms including waived fees, free tickets, free food or hospitality, property, the promise of a higher paying job or promotion to name a few.

Employees must not engage in any form of bribery, either directly or through a third party (such as an agent or distributor). Specifically, employees must not bribe or attempt to bribe foreign public officials anywhere in the world.

Corruption is the misuse of entrusted power for private gains. There are many different types and forms of corruption for which the AMS stance is outlined below.

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 governmental 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.

Company policy is not to pay any kind of facilitation payment. We do however recognize that on some occasions our employees may be faced with situations where there is a risk to the personal security of an employee and where a facilitation payment is unavoidable, in which case these guidelines should be employed:

- Inform your immediate manager, if possible, before making any payments;
- Ask if a receipt will be available (this often acts as a deterrent);
- Record any details possible concerning the payment; and
- Inform the Compliance department and create a record concerning the payment.

Kickbacks 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 in order to conclude the business agreement at issue.

AMS employees and third-party affiliates may not make undocumented cash payments, on AMS' behalf, to any government agency, government official, or private individual for any purpose. AMS employees approached by a third-party demanding kickback must report this immediately to the Compliance department via email.

Kickbacks are generally a type of payment given between individuals or companies colluding ahead of time to fix the provision of goods or services, the "Kickback" is commonly a payment based on the differing price. This type of action is often carried out when an individual who is responsible for approving a bidding process agrees to receive a payment for approving:

- A contract at an inflated price;
- Goods that are not actually required or are excessive in quantity; or
- Goods of poor quality or that do not adhere to the actual specified requirements.

Gifts, Hospitality and Expenses

AMS employees must not give or receive courtesies which could be evaluated as an illegal or improper exchange. They must refrain from offering courtesy which violates the recipient's standards. In addition, government or public servants may be under strict guidelines, preventing them from receiving courtesies. Offering courtesies to government or public servants may be considered as illegal in certain countries.



Courtesies in the form of travel, meals, receptions, sightseeing, gifts, or other expenses may only be offered or given to persons with a professional interest in the relationship but not to any spouses and relatives.

To avoid gifts, hospitality and entertainment having an undue influence on business decisions, their maximum value must be in accordance with local, professional and industry standards specific to each country and appropriately balanced not to constitute an amount disproportional to the receiver's income level. If in doubt, ask Senior Management for recommendations.

Any gifts or offers of hospitality exceeding the stated limit will require approval before being accepted, where an approval is required for this, if the manager is below Director level then approval must be sought from a Vice President or Senior Compliance Manager, if the offer is made to a Vice President then the approval must come from the CEO, CFO or COO.

If it is not appropriate to decline the offer of a gift, for example if offence would be created by the act of declining then the gift may be accepted, however in such cases any gift or hospitality must be declared to the Compliance Department by email at the soonest reasonable opportunity for any appropriate action.

It is appreciated that the practice of giving business gifts varies between countries and regions and what may be normal and acceptable in one region may be looked on unfavorably in another. The test to be applied is whether in the circumstances the gift or hospitality is reasonable and justifiable and the intention behind the gift. In general terms the employee should ask themselves if they would be happy for the details of the gift to be common knowledge (if the answer is no then it should be politely declined).

Within these parameters, local management may define specific guidelines and policies to reflect local professional and industry standards. In such cases this will be done in writing and communicated to all personnel to whom it will apply.

Protection Money

In some instances, protection money may be solicited. This is a kind of extortion which might involve physical threats. AMS will not engage in such affairs and see it as our obligation to protect any employees and partners, all 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.

AMS prides itself as a Company on the charitable support and donations it offers 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 donation or assistance must be offered or made without the prior approval of Executive Management.

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

Protection for Whistleblowers

Employees who refuse to accept a bribe or who do not offer bribes can often be worried about any possible repercussions in particular if they subsequently report any improper practices, our Company encourages openness and we will support anyone who raises a genuine concern in good faith under this policy, regardless of whether the concern turns out to be unfounded or mistaken.



As part of our Company Whistleblowing Policy, we as a Company aim to ensure no one suffers any unfair treatment as a result of refusing to take part in any act of bribery or corruption, or because they reported their suspicions or concerns. Unfair treatment includes dismissal, disciplinary action, threats (actual or implied) or other unfavorable treatment connected with raising a concern. If the employee believes they have suffered any such treatment, the employee should inform their respective Line Manager or responsible superior in line with the Whistleblowing Policy as soon as it is practical to do so.

6.3. 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 enter 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 has to collect and understand documentation about respective 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.

6.4. Engaging Third Parties

Third parties include a broad range of entities and individuals that act on behalf of AMS, including agents, consultants, representatives or similar intermediates. We do not select or retain consultants, representatives or third parties to conduct business in a manner that is contrary to our policies or that would circumvent our values and principles.

6.5. Political Process / Anti-Lobbying

AMS encourages individual participation by employees in the political process. This includes service on governmental bodies and participation in partisan political activities. However, such activities should not be carried on in a way that interferes with the employee's job responsibilities or creates a conflict of interest.

Employees cannot make political contributions using Company funds or accept public positions in industry or government relying on their status as an AMS employee without first obtaining approval from Executive Management.

6.6. Compliance with this Policy

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