## Acis Code for our working relationship V.1.0, June 2025

## 1 What this Code is about and why it is needed

The Code aims to set out the reciprocal way which Acis and another party may behave in a working relationship. We realise that working relationships may vary considerably though by having regard to this Code Acis believes it will be mutually beneficial.

Acis Code (the "Code") covers our working relationships with either Suppliers, Partners or Clients.

#### 2. Who does this Code apply to

The Code applies to Acis and the Party as defined below

- Acis means Acis Group Ltd and its subsidiaries which may change for time to time ("Acis"/"we").
- ➤ Client means the organisations that buy goods, services and or works from Acis
- Partner means the organisations that work with Acis.
- > Supplier means any supplier of Acis and not limited to contractors, consultants, service providers, agents, sub-contractors and throughout the supply chain.
- ➤ Relationship Party (the "Party"/ "you") means the entity/organisation that is a Supplier, Partner and/ or Client

### 2.1. This Code is between Acis and the other Party

This Code helps to establish how Acis will behave and what Acis expectations are for how the other Party should behave.

#### 2.2 Quality of the Relationship

At Acis, across all the things we do, quality matters. Our values and principals shape our behaviour which in turn effects quality. These values and principles can be found in the attached Acis Code of Conduct, Section 4. Our Values and Behaviours.

We know what a quality working relationship looks like however defining is not always easy. We shall continue to value for money for our customers and we are further defining what quality means to us across all our services by 2026. This Code forms part of that definition.

We understand that many of you will be shaped by your own code, values and principals and we are not expecting you to change these, just uphold this Code when dealing with us.

#### 2.3 Legal Considerations

The Code is **not** intended to be legally enforceable which includes but not limited to; contradicting legislation, create any legal obligations or rights, or undermine contracts. If the Code is referenced in an agreement and where no order of precedence is set out, the Code shall be considered last. Where applicable the Code may apply if the working relationship ends.

We know we must meet all our legal compliance requirements, and we expect you to the same.

## 3. A. How people conduct themselves

Acis has a code of conduct for all its employees (this also includes our Board Members) which is divided into the three main headings and it has various subheadings. These table below shows where further detail are provided in this Code relative to the sub-heading.

| Acis code of conduct for its      | The Code expands on certain parts as          |
|-----------------------------------|---|
| employees                         | detailed below.                               |
| 1. Our Organisation               |   |
| General Responsibilities          | See 3.B. Acting in the best interests of Acis |
| Handling Information              |   |
| Respecting Confidentiality        |   |
| Facilities and Equipment          | See 3.D Facilities and Equipment              |
| 2. Our People                     |   |
| Equality, Diversity and Inclusion | See 3.A.2 Dignity at work                     |
| Reputation and Respect for others |   |
| Performance Management and        |   |
| Development                       |   |
| Dedication to Learning            |   |
| 3. Our Ways of Working            | 3.C Standards of Behaviour                    |
| Honesty and Integrity             |   |
| Openness and Accountability       |   |
| Professionalism                   |   |
| Ethical Behaviour                 |   |
| Declaring Interests               |   |
| Fulfilling your role              |   |
| Safeguarding                      | See 3.A.1 Health, Safety and Wellbeing,       |
|                                   | 3.A.3 Modern Slavery and                      |
|                                   | 3.A.4 Safeguarding                            |

Acis code of conduct is attached so you can be clear about how we aim to conduct ourselves. We expect equivalent conduct from you.

## 3.A Protecting yourself and others

#### 3.A.1 Health, Safety and Wellbeing

Health and safety culture is embedded in Acis, with the health, safety and wellbeing of Acis and the other Party's people being of paramount importance. Acis's believes that "all workplace and work-related injuries and ill-health accidents are preventable".

Everyone working on our sites is required to comply with and actively promote Acis health and safety policy.

All relevant work must be risk assessed and must not commence until suitable and sufficient safe systems of work are in place and appropriate authorisations and permits have been issued. In addition, the other Party must be able to demonstrate suitable supervision is in place for direct employees and sub-contractors.

Acis must ensure all persons, employees and sub-contractors, have the right skills, knowledge training and experience for the work they are carrying out and have access to and use appropriate PPE. All plant and equipment used must meet the appropriate standards and be fit for purpose for the task and operators must be trained and competent and authorised/appointed to operate/use. The other Party must also do this.

Acis expect everyone within our supply chain to have health and safety systems equal to or above Acis standards and suitable processes in place to monitor compliance. Acis will also undertake periodic assurance for health and safety. We have an open and honest culture with everyone taking responsibility for their own health, safety and wellbeing, and of those effected by their activities.

Acis actively encourage reporting of health and safety concerns/issues for action.

Acis offer wellbeing support and resources for our employees, and hold regular events to promote a "happier, healthier, safer" workforce. Acis believes it is important to give wellbeing an equal focus to health and safety as they are connected. Together both help us to be safe and well at work.

We encourage the other Party to adopt a similar approach to all the above health, safety and wellbeing section.

#### 3.A.2 Dignity at work (Harassment, Bullying, Victimisation and Discrimination)

People that work for both parties have the right to work in an environment in which they feel safe, respected and valued, and have dignity at work. This includes the commitment of ensuring a professional and supportive workplace, and dignity at work is established. For clarity people may include but not limited to volunteers, consultants, temporary staff and also cover the supply chain.

An integral part of this is ensuring that both parties people feel protected from behaviour that they feel is offensive, humiliating, intimidating, hostile, degrading, malicious or insulting, or less favourable due to an issue they have or may raise. Conduct that breaches this standard may constitute bullying, harassment, victimisation and/or discrimination.

Harassment can be in the form of:

- Harassment related to a protected characteristic
- Sexual harassment
- Less favourable treatment because someone submits to, or rejects, sexual harassment or harassment related to sex or gender reassignment

Bullying, harassment, victimisation and discrimination could take the form of, but is not limited to:

- Spoken or written words
- · Posts or contact on social media
- Imagery, graffiti or drawings

- Physical gestures and facial expressions
- Jokes, pranks, mimicry, or acts that affect a person's surroundings or belongings

Acis is sure that the workplace must be free from harassment, abuse and violence. It is unacceptable for members of the supply chain to use physical abuse or physical discipline, verbal abuse, coercion, sexual harassment and sexual abuse at any time. The use of bullying and harassment within the supply chain is unacceptable and will not be tolerated by Acis. We encourage all individuals within the supply chain to report any incidences of unacceptable behaviour, regardless of whether they have been personally affected in accordance with their procedures/ process.

If an Acis employee does not wish to report unacceptable behaviour in the supply chain directly, they can do so anonymously via the Acis Confidential Reporting (Whistleblowing) channel.

Where permissible Acis may take legal/ criminal proceedings against the perpetrator.

Acis expects a similar approach to Dignity at Work section 3.A.2 by the other Party.

#### 3.A.3 Modern Slavery

Acis complies with all applicable human rights and employment laws in the jurisdictions in which we work and due to Acis turnover includes the provisions of the Modern Slavery Act 2015. Acis has zero tolerance of Modern Slavery.

Acis is aware that victims of modern slavery / human trafficking may be include the supply chain or service users.

#### 3.A.4 Safeguarding

Acis works with a wide range of vulnerable service users of all ages and has safeguarding policy, procedure and processes in place. A part of Acis Safeguarding policy that Suppliers and Partners may become aware of or suspect situations where abuse of a vulnerable person may be taking place. In all cases we expect the other Party to follow **their** safeguarding policy, procedure and process.

Where the other Party has not got an equivalent safeguarding policy and or procedure they should adopt Acis policy. Acis Safeguarding policy is particularly relevant to the other Party as follows:

- i) complete safeguarding awareness training
- ii) has an awareness regarding safeguarding concerns
- iii) able to raise safeguarding concerns correctly and promptly
- iv) safe working in relation to safeguarding
- v) safe recruitment e.g. appropriate Disclosure and Barring Service (DBS) checks
- vi) on-boarding suppliers, volunteers etc. e.g. proportionate due diligence checks
- vii) wellbeing support for those involved in safeguarding cases to be provided
- viii) including any training that Acis identifies as required

The process regarding observing and reporting that is relevant to the other Party (including their sub-contractors) is in Annex A - Safeguarding Process for first person.

#### 3.A.5 Managing the Relationship and Responsibilities

We commit to provide you with at least one point of contact and let you know in advance if this will change. Where required we shall set out who is responsible for different areas. We will maintain constructive, professional relationships with all applicable people based on a sound understanding of their roles. We shall not ask for, or encourage, the commitment of wrongdoing, including any breach of this Code. In return we expect you to the same.

## 3.B. Acting in the best interests of Acis

We act in the best interests of Acis and we expect you should also. This may include but not limited to the following;

- Meeting Acis service user needs
- Representing Acis and working with Acis service users
- providing value for money
- Management of risk
- Delivery and or performance management
- Information security and cyber security
- Open and fair competition
- Sustainable procurement
- Intellectual property
- Prompt payment

If you need to know more information on how 'Acting in the best interests of Acis' relates to our working relationship, please ask your Acis representative.

#### 3.C Standards of Behaviour

We act professionally in our working relationships, and this includes ensuring our standards of behaviour is in line with our values and ethics. We expect you to also have similar behaviours. These behaviours may include but not limited to the following;

- Ethical behaviour
- Transparency
- Treatment of supply chain
- Corporate governance
- Corporate Social Responsibility

If you need to know more information on our 'standards of behaviour' relates to our working relationship, please ask your Acis representative.

#### 3.D Facilities and Equipment

In some working relationships we work together which could include on the same project, same premises. Acis do use facilities, premises, equipment etc. for its intended purpose in a responsible and lawful manner. We expect you to do this also.

If you need to know more information on how 'Facilities and Equipment' relates to our working relationship please ask your Acis representative.

#### 4. Confidential Reporting

## 4.1 Confidential Reporting (Whistleblowing) excluding Safeguarding

We commit to tell you if we belief something is not quite right, or you have a concern and give you appropriate cooperation. In return we ask of you to have the same commitment. Our Confidential Reporting (Whistleblowing) Policy Exp Sep25 is available on request and a relevant email address is <a href="mailto:whistleblowing@acisqroup.co.uk">whistleblowing@acisqroup.co.uk</a>.

### 4.2 Safeguarding Confidential Reporting

The diagram in Annex A sets out the process for safeguarding reporting. The way you should to report is via a free of charge to use web based application called MyConcern. There are three different QR codes to choose from and relates to different parts of Acis business.

#### 5. Further Information

If you require any assistance or guidance, please contact your Acis representative in the first instance or Acis Procurement by email: <a href="mailto:procurement@acisgroup.co.uk">procurement@acisgroup.co.uk</a>

#### 6. Confirmation that You have read and understood this Code

I/We acknowledge that we have read and understood the above Acis Code April 2025 V.1.0 and agree to work with Acis as outlined within.

I/We will ensure any relevant subcontractors that we engage on work for Acis are aware of the Acis Code and that they agree to work as outlined.

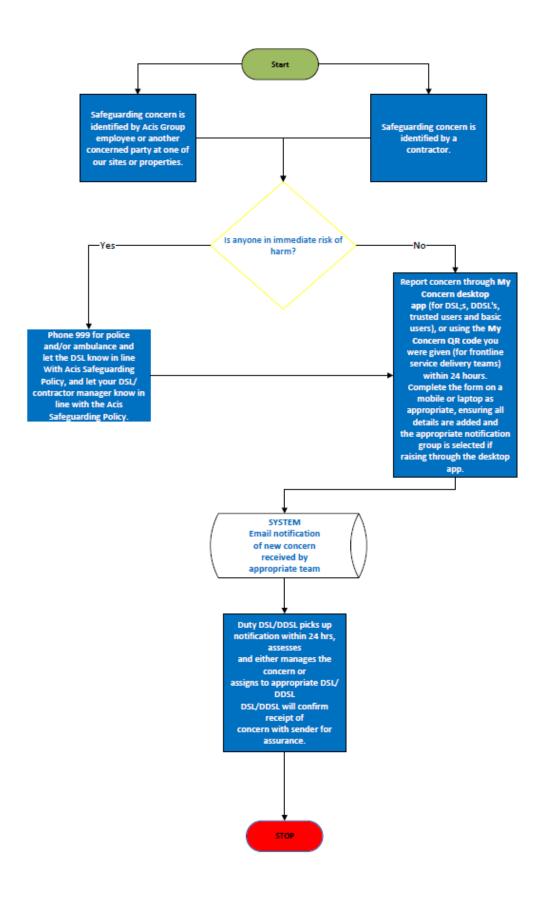
| Contact name:          |  |
|------------------------|--|
| Relationship<br>Party: |  |
| Address:               |  |
| Telephone:             |  |
| Email:                 |  |
| Signature:             |  |
| Date:                  |  |

# **Safeguarding Position**

| Position   |                  | Response |
|--|------------------|----------|
| We believe Safeguarding our relationship   | is applicable in |          |
| We have a Safeguard documents (e.g. safeguard we have attached these do  | ding policy) and |          |
| 3. We do not have a Safeguarding suite of documents (e.g. safeguarding policy) and we agree to adopt Acis Safeguarding Policy (attached) |                  |          |
| We are unsure if Sa applicable.  | afeguarding is   |          |

Please return this competed this page and *return it with any relevant documentation* to Acis. Thank you.

Annex A - Safeguarding Process - first person dealing with it



Annex B - MyConcern QR codes to scan e.g. using mobile





