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# **AMS Supplier Code of Conduct**

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Issued by: Purchasing Department

Architectural & Metal Systems Ltd, Wallingstown, Little Island, Cork, Ireland T45 VP40.  
Phone: 021-4705 100. [www.ams.ie](http://www.ams.ie)

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# AMS Supplier Code of Conduct

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## 1. Purpose & Scope

Architectural & Metal Systems Ltd. (“AMS”) is committed to operating responsibly, ethically, and sustainably across all areas of our aluminium extrusion, finishing, and fabrication business. Our suppliers, contractors, service providers, and agents (“Suppliers”) play a crucial role in helping us achieve high standards in environmental performance, human rights, product compliance, and supply-chain resilience.

This Supplier Code of Conduct outlines the minimum requirements expected from all Suppliers to AMS. These requirements apply not only to the Supplier’s own operations but must also be **cascaded to all subcontractors, upstream partners, and associated supply-chain entities**.

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## 2. Compliance Requirements

Suppliers must, at a minimum:

- Comply with all applicable **Irish, EU, and international laws and regulations**
- Adhere to the principles of the **UN Global Compact, UN Guiding Principles on Business & Human Rights, ILO Core Labour Standards**, and relevant aluminium industry standards
- Support AMS in meeting sustainability requirements, including **CBAM, ESRS/CSRD, ASI Performance Standards**, and customer-driven compliance obligations

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## 3. Business Integrity & Ethical Conduct

### 3.1 Anti-Corruption & Anti-Bribery

Suppliers shall not engage in any form of bribery, corruption, or facilitation payments. This includes:

- Offering, giving, requesting, or accepting anything of value to influence business decisions
- Using intermediaries, agents, or subcontractors to bypass ethical requirements
- Attempting to influence AMS tendering, negotiation, or award processes

Any conflict of interest—actual or perceived—must be disclosed immediately.

### 3.2 Competition & Fair Business Practices

Suppliers must conduct business in a fair, open, and competitive manner, avoiding:

- Price-fixing
- Collusion
- Market allocation
- Manipulation of tenders

### 3.3 Anti-Money Laundering & Trade Controls

Suppliers shall take measures to prevent money laundering and comply with all applicable trade sanctions, customs rules, and export-control regulations.

### 3.4 Data Protection & Confidentiality

Suppliers must respect AMS's intellectual property, protect technical drawings, prevent unauthorised disclosure of sensitive information, and comply with GDPR and relevant data-protection legislation.

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## 4. Human Rights & Working Conditions

### 4.1 Respect for Human Rights

Suppliers shall identify, prevent, and mitigate adverse human-rights impacts connected to their operations and supply chains.

### 4.2 No Forced or Child Labour

- No employment of children under the legal minimum age
- No forced, bonded, trafficked, or involuntary labour
- Workers must be free to leave employment with reasonable notice
- No withholding of passports, identity documents, or financial deposits

### 4.3 Working Hours, Wages & Conditions

Suppliers must provide:

- Fair and lawful wages consistent with legal requirements
- Safe working hours
- Paid leave and benefits required by law
- Written employment contracts in a language workers understand

### 4.4 Freedom of Association

Workers must have the right to form or join organisations of their choice and engage in collective bargaining.

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## 4.5 Non-Discrimination & Dignity at Work

Suppliers must prohibit discrimination based on gender, race, religion, nationality, disability, age, political views, sexual orientation, or any protected characteristic.

Harassment, intimidation, abuse, or degrading treatment is strictly forbidden.

## 4.6 Local Community Rights

Where applicable, Suppliers must respect local communities and indigenous rights, engage in dialogue when operations may impact land or resources, and avoid harmful displacement.

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## 5. Health, Safety & Wellbeing

AMS places safety at the heart of our operations. Suppliers must:

- Provide safe working environments aligned with the ILO Occupational Health & Safety Conventions
- Ensure workers are trained, competent, and authorised to stop unsafe work
- Supply appropriate PPE and ensure proper use
- Implement incident investigation and reporting procedures
- Maintain safe and sanitary worker accommodation where provided

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## 6. Environmental Responsibility

Given AMS's role in the aluminium manufacturing value chain, Suppliers must demonstrate environmental responsibility and support AMS in achieving sustainability objectives.

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## 6.1 Legal & Permit Compliance

Suppliers must operate in full compliance with environmental laws, including waste, emissions, chemical handling, and water usage regulations.

## 6.2 Environmental Management System

Suppliers should:

- Identify, evaluate, and mitigate environmental risks
- Implement controls for waste, hazardous materials, and spill prevention
- Promote resource efficiency, circularity, and recycling
- Reduce greenhouse gas emissions and energy consumption

## 6.3 Climate and Biodiversity Considerations

Suppliers are encouraged to adopt practices that minimise impacts on biodiversity, ecosystems, and land and water resources, in line with ESRS and ASI guidance.

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## 7. Product Quality, Compliance & Traceability

AMS depends on reliable delivery of materials (e.g., aluminium billets, paints, chemicals, packaging, consumables, machinery). Suppliers must ensure:

- Accurate technical documentation (SDS, COA, CBAM emissions data, ASI certificates)
- Full product traceability
- Immediate communication of defects, deviations, or non-conformities
- Compliance with contractual specifications, standards, and regulatory requirements

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## 8. Supply Chain Due Diligence & Subcontractors

Suppliers must:

- Cascade AMS standards to all subcontractors and upstream partners
- Conduct due diligence in line with OECD Guidelines for Responsible Business Conduct
- Avoid conflict minerals or materials linked to human rights abuses
- Remain transparent about their own supply-chain structure when requested

AMS reserves the right to request audits, corrective-action plans, or supply-chain mapping where needed.

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## 9. Supplier Grievance Mechanisms

### 9.1 Whistleblowing & Reporting

Suppliers must maintain confidential channels for workers to raise concerns. Suppliers are expected to report material violations to AMS without delay.

### 9.2 Audits & Assessments

AMS may conduct audits, site visits, document checks, interviews, or third-party assessments at any time.

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## 9.3 Non-Compliance

Failure to meet this Code may result in:

- Corrective action requirements
- Suspension of orders
- Contract termination
- Removal from the approved supplier list

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## 10. Management Systems

Suppliers are encouraged to maintain certifications such as:

- ISO 9001 (Quality)
- ISO 14001 (Environmental)
- ISO 45001 (Health & Safety)
- ISO 50001 (Energy)

AMS may request evidence of certification or equivalent systems

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## 11. Acknowledgement & Implementation

Suppliers must:

- Formally acknowledge this Code
- Integrate the requirements into their policies, procedures, and subcontracting arrangements
- Cooperate fully with AMS on sustainability, safety, and compliance initiatives
- Provide updated certifications and documents as required by AMS (e.g., CBAM, ASI, SDS, insurance, HSE documentation)

AMS will review and update this Code periodically.

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## 12. Conflict Minerals & High-Risk Raw Materials

Suppliers shall avoid sourcing materials from conflict-affected or high-risk areas unless OECD-aligned due diligence is performed. Suppliers must ensure materials supplied to AMS do not contribute to human rights abuses or illegal mining practices.

### Supplier Declaration

By signing below, the Supplier confirms understanding and acceptance of the AMS Supplier Code of Conduct and agrees to comply with all requirements.

Company Name: \_\_\_\_\_

Name & Title: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

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