



Accenture Federal Services Supplier Standards of Conduct

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Introduction

At Accenture Federal Services (AFS), we value high performance in our business and our people (including our suppliers), and values-based business ethics is at the core of all we do. The complex, regulated, and competitive federal environment in which we work requires that we understand the critical ethics and compliance guidelines, and unique rules for doing business with our principal client, the US Federal Government.

The relationship between AFS and our suppliers is an important component to achieving high performance in our business. Our AFS Supplier Standards of Conduct set forth the principles and practices that AFS suppliers are required to uphold. AFS is committed to helping our suppliers comply with these standards. In turn, AFS expects all suppliers to apply these standards to their suppliers.

Thank you for your continued efforts and collaboration to adhere to the AFS Supplier Standards of Conduct. Please direct all questions about these standards to your AFS Procurement representative.

Gerard F. Amann

General Counsel and Chief Ethics and Compliance Officer
Accenture Federal Services

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Accenture Federal Services Supplier Standards of Conduct

Our Supplier Standards of Conduct at a Glance

Our Supplier Standards of Conduct is built on the framework of Accenture's and AFS's core values: **Stewardship, Best People, Client Value Creation, One Global Network, Respect for the Individual, and Integrity**. Our core values shape the culture and define the character of our company. They guide how we behave and make decisions. Each core value is supported by action statements and specific behaviors that we expect of our suppliers.

1. **Stewardship**

- 1.1. Comply with all applicable environmental laws
- 1.2. Reduce negative environmental impact
- 1.3. Protect AFS and Accenture confidential information and intellectual property rights

2. **Best People**

- 2.1. Do not discriminate in employment or hiring practices
- 2.2. Comply with "revolving door" and Procurement Integrity Act restrictions
- 2.3. Complete AFS-required training

3. **Client Value Creation**

- 3.1. Deliver quality and comply with terms and conditions of AFS contracts
- 3.2. Submit accurate proposals and invoices to AFS
- 3.3. Maintain accurate books and records and provide audit assistance
- 3.4. Comply with the Anti-Kickback Act
- 3.5. Ensure accessibility to Persons with Disabilities

4. **One Global Network**

- 4.1. Comply with applicable competition laws
- 4.2. Do not seek or obtain competitors' non-public proprietary information or Federal Government sensitive information relating to a procurement
- 4.3. Do not make improper "contingent payments" to obtain Federal Government business
- 4.4. Comply with all applicable international trade controls and deliver products and services that meet the Federal Government's country of origin and domestic preference restrictions
- 4.5. Do not perform work outside of the United States

5. **Respect for the Individual**

- 5.1. Treat people with respect and dignity
- 5.2. Allow employees the freedom of association and collective bargaining
- 5.3. Do not use, encourage, or engage in forced labor, human trafficking, or harmful child labor
- 5.4. Comply with all applicable employment laws
- 5.5. Provide a safe, healthy work environment
- 5.6. Do not participate in inappropriate use of social media

6. **Integrity**

- 6.1. Do not offer inappropriate gifts or entertainment to AFS employees or third parties
- 6.2. Comply with all applicable anti-money laundering and counter-terrorist financing laws
- 6.3. Avoid conflicts of interest
- 6.4. Avoid insider trading
- 6.5. Do not use counterfeit parts
- 6.6. Protect the privacy of personal information
- 6.7. Maintain an ethics and compliance program

1. Stewardship

AFS suppliers are conscious of their impact on the environment and strive to minimize their negative impacts to preserve our natural resources for future generations. At a minimum, AFS suppliers comply with all applicable environmental laws and regulations such as waste management and recycling. AFS suppliers protect Accenture and AFS confidential information and intellectual property.

1.1 Comply with all applicable environmental laws

AFS suppliers comply with all applicable environmental laws, regulations, and standards.

1.2 Reduce negative environmental impact

AFS suppliers commit to reducing their negative environmental impact and provide visibility to their progress toward this commitment. They encourage the development and use of environmentally friendly technologies and practices and the reduction of negative environmental impacts throughout their supply chain.

1.3 Protect AFS and Accenture confidential information and intellectual property rights

AFS suppliers respect and comply with all the laws governing intellectual property rights assertions, including protection against disclosure, patents, copyrights, and trademarks. AFS suppliers respect and maintain the confidentiality of AFS or Accenture non-public information.

2. Best People

AFS suppliers attract and develop the best talent for their business regardless of individual characteristics. They ensure that their employees take any required AFS training.

2.1 Do not discriminate in employment or hiring practices

AFS suppliers provide equal employment opportunities and do not discriminate on the basis of age, sex, color, religion, disability status, national origin, race, creed, past or present membership in the uniformed services, marital status, sexual orientation, gender expression or identity, citizenship status, genetic information, or any other basis as protected by Federal, state or local law. Local laws and certain contracts may require AFS suppliers to, or may give AFS suppliers the right to, protect or give priority to a particular category of people when taking certain hiring or employment decisions.

2.2 Comply with “revolving door” and Procurement Integrity Act restrictions

AFS suppliers observe “revolving door” post-Government employment restrictions and do not engage in employment discussions with current Government employees unless the employees have recused themselves from work involving the supplier. AFS suppliers abide by any compensation bans applicable for Government employees after leaving Government employment.

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2.3 Complete AFS-required training

AFS suppliers help their employees comply with our Supplier Standards of Conduct by ensuring that their employees take AFS-provided training when required by contract.

3. Client Value Creation

AFS suppliers provide value for money and continually seek to improve their products and services.

3.1 Deliver quality and comply with terms and conditions of AFS contracts

Following award of a contract, AFS suppliers comply with all AFS and customer specifications, requirements, terms, and conditions. They do not substitute a different product or service or use independent contractors to support AFS contracts, without appropriate prior written approval. AFS suppliers follow all AFS and customer security requirements.

3.2 Submit accurate proposals and invoices to AFS

AFS suppliers preparing proposals, bids, or contract negotiations for AFS and our clients ensure that all statements, communications, and representations are accurate and truthful. AFS suppliers submit accurate invoices and promptly correct and notify AFS of any invoice errors. AFS suppliers ensure their employees maintain accurate and complete time and expense entries and reports.

3.3 Maintain accurate books and records and provide audit assistance

AFS suppliers maintain accurate books and records. AFS suppliers retain books and records in accordance with regulatory requirements for document retention timelines and respond promptly when requested by AFS to assist in responding to audits.

3.4 Comply with the Anti-Kickback Act

AFS Suppliers enter into agreements based on merit and do not accept kickbacks in any form, including contingency fees, gratuities, commissions, rebates or discounts that are made for the purpose of improperly obtaining or rewarding favorable treatment in connection with a prime contract, or in connection with a subcontract relating to a prime contract.

3.5 Ensure accessibility to Persons with Disabilities

AFS suppliers ensure that accessibility needs are included as part of their own procurement processes. AFS suppliers who sell or license hardware, software, web, learning and information technology or offer technology solutions as part of their products and services must also ensure that all products, software and/or services that are provided to AFS meet all relevant accessibility standards, including (but not limited to) Section 508 of the Rehabilitation Act of 1973, as applicable, Web Content Accessibility Guidelines 2.0AA (WCAG 2.0 AA), and any update or revision to these Guidelines.

4. One Global Network

AFS suppliers mobilize the power of teaming to consistently deliver exceptional products and services. They understand and comply with laws and regulations that apply to their business, and they cooperate with Government investigations and audits.

4.1 **Comply with applicable competition laws**

AFS suppliers understand and comply with all applicable competition laws, including those related to teaming and information-sharing with competitors (whether through joint ventures, alliances or other collaborations).

4.2 **Do not seek or obtain competitors' non-public proprietary information or Federal Government sensitive information relating to a procurement**

A critical aspect of Federal Government competitions is a level playing field. A competitor with access to protected information of the Federal Government or another competitor may have an unfair advantage. AFS suppliers do not seek to obtain non-public competitor or source selection information during Government competitions. If such information comes into the hands of an AFS supplier, the AFS supplier acts appropriately to contain it and notify the impacted parties.

4.3 **Do not make improper "contingent payments" to obtain Federal Government business**

AFS suppliers do not make payments to third parties that are contingent solely on AFS receiving Federal Government business.

4.4 **Comply with all applicable international trade controls and deliver products and services that meet the Federal Government's country of origin and domestic preference restrictions**

In the event that AFS suppliers serve AFS across national borders, they understand and comply with all applicable international trade controls (i.e., export controls, economic sanctions, and anti-boycott laws). AFS suppliers do not alter or remove the country of origin markings on products to be delivered to the Federal Government. AFS suppliers purchase services for use on Federal engagements in compliance with applicable domestic preference laws

4.5 **Do not perform work outside of the United States**

AFS suppliers do not perform AFS-related work or take information related to an AFS contract outside of the continental United States without prior written approval

5. Respect for the Individual

AFS suppliers value diversity, ensure an inclusive environment, and treat people with respect and dignity.

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5.1 Treat people with respect and dignity

AFS suppliers treat people with dignity and respect and maintain a respectful and safe workplace. They do not tolerate physical violence, threats, corporal punishment, mental coercion, verbal abuse, disrespectful behavior, bullying or harassment of any kind (whether or not such harassment is legally prohibited on the basis of protected characteristics).

5.2 Allow employees the freedom of association and collective bargaining

AFS suppliers recognize and respect the right of their people to freely join or refrain from joining worker organizations of their choosing and entering into collective bargaining as permitted by law.

5.3 Do not use, encourage, or engage in forced labor, human trafficking, or harmful child labor

AFS suppliers do not use, encourage, or engage in human trafficking, slavery, servitude, forced, bonded, compulsory, indentured or involuntary labor. Employees of AFS suppliers voluntarily agree to the terms and conditions of their employment without coercion, and can freely terminate their employment either (i) immediately without notice, or (ii) on reasonable notice (required notice periods are always set out in employment contracts and vary in relation to the seniority of the employee and the requirements of local laws).

In addition, where permitted by applicable local employment laws, AFS suppliers may recover from an employee who terminates their employment within a defined period: (i) training expenses, (ii) payments made for retention purposes, and (iii) hiring bonuses or other variable compensation. Notwithstanding this, AFS suppliers do not require employees to work a longer period than their contractual notice period in order for the AFS supplier to recover such expenses, payments, or bonuses.

AFS suppliers do not use, encourage or engage in human trafficking. They do not, among other things: destroy, conceal, confiscate, or otherwise deny employees' access to identity or immigration documents; charge workers recruiting fees; employ recruiters that violate labor laws; provide housing that fails to meet safety or housing laws; use fraudulent or misleading recruitment practices; or fail to provide written work documents, where required, or provide documents in a language that their workers do not understand.

AFS suppliers do not use, encourage, or engage child labor. Child labor means labor that deprives children of their childhood, their potential, and their dignity, and that is harmful to their physical or mental development. AFS suppliers understand and do not violate applicable laws regarding minimum age requirements. They do not employ people under the age for completing compulsory education. AFS suppliers may operate workplace apprenticeship, work experience or internship programs that comply with applicable laws.

5.4 Comply with all applicable employment laws

AFS suppliers comply with all applicable employment laws and regulations, including those around working time, overtime, and minimum wage requirements. In addition, AFS strongly encourages all its suppliers whose people directly provide services to AFS and/or its clients to commit to paying all such people a living wage, which will be higher than the legal minimum wage requirement and will take into account relevant actual living costs.

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AFS suppliers abide by applicable Government requirements to verify U.S. Citizenship. Suppliers follow established guidelines and communicate specific requirements to potential hires seeking to work on client engagements that impose special requirements for access to restricted Federal Government-owned facilities and information, including security clearances.

5.5 Provide a safe, healthy work environment

AFS suppliers are committed to the health and safety of their people and of visitors to their work locations. AFS suppliers comply with all applicable health and safety laws, provide a safe, healthy working environment and take the necessary precautions to protect everyone from workplace injuries and occupational disease.

5.6 Do not participate in inappropriate use of social media

AFS suppliers do not tolerate disrespectful or unprofessional usage of social media (whether or not such usage relates to AFS, its business, clients, employees or business partners) such as posting content that is abusive, malicious, obscene, threatening or intimidating, or that contains ethnic, religious, gender or other derogatory statements in any message or post. AFS suppliers do not allow their employees to post information related to the work they do for AFS.

6. Integrity

AFS suppliers understand and comply with all applicable laws. AFS suppliers inspire trust by taking responsibility, acting ethically, and encouraging honest and open debate.

6.1 Do not offer inappropriate gifts or entertainment to AFS employees or third parties

AFS suppliers do not make bribes or any other improper payment directly or through a third party in the form of gifts, meals, travel, or entertainment to AFS employees, public officials, commercial clients, business partners, or other third parties; and employees of AFS suppliers do not accept gifts, meals, travel, or entertainment from third parties that are, or could be perceived as, bribes.

6.2 Comply with all applicable anti-money laundering and counter-terrorist financing laws

AFS suppliers comply with anti-money laundering and counter-terrorist financing laws wherever they do business and do not engage in or assist any third parties with these crimes.

6.3 Avoid conflicts of interest

AFS suppliers avoid all conflicts of interest or situations giving the appearance of a potential conflict of interest in their dealings with AFS. We expect our suppliers to provide notification to all affected parties in the event that an actual or potential conflict of interest arises.

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6.4 Avoid insider trading

AFS suppliers and their employees do not use material, non-publicly disclosed information obtained in the course of their business relationship with AFS as the basis for trading or for enabling others to trade in the securities of Accenture any other company.

6.5 Do not use counterfeit parts

AFS suppliers develop, implement, and maintain methods and processes appropriate to their products to minimize the risk of introducing counterfeit parts and materials into contract deliverables. These processes should detect counterfeit parts and materials, provide notification to recipients of counterfeit product(s) when warranted, and exclude them from the delivered product. Where applicable, AFS suppliers comply with relevant laws related to supply chain risk management and avoidance, detection, and use of counterfeit electronic parts.

6.6 Protect the privacy of personal information

AFS suppliers protect personal privacy and comply with applicable privacy and data protection laws. They secure AFS data, in accordance with AFS-provided standards, against unauthorized access and use and do not re-use AFS personal data for their own business purposes without prior permission. AFS suppliers recognize that any use, sharing, or retention of personal data must be supported by, or based on, consent or a legitimate, compelling business purpose, and strictly in accordance with the contractual terms and conditions agreed with AFS.

6.7 Maintain an ethics and compliance program

AFS suppliers have, commensurate with their size and nature of their business, management systems in place to support compliance with laws, regulations, and the expectations related to or addressed expressly within this Supplier Code of Conduct. AFS expects its suppliers to flow down the principles of this Supplier Code of Conduct to the entities that furnish them with goods and services.

7. AFS' Audit Rights in Relation to These Standards of Conduct

- 7.1. AFS may audit, at its own cost and expense, an AFS supplier's adherence to these Standards of Conduct in relation to the locations where, or from which, goods or services are provided to AFS. Such audits may be conducted during normal business hours once annually, and AFS will provide at least 60 days prior written notice of its intention to conduct such an audit. AFS will conduct such audits in a manner that will result in minimal disruption to the AFS supplier's business and HR operations. AFS's employees or independent representatives (who must not be competitors of the AFS supplier) will execute appropriate confidentiality agreements prior to such audit.
- 7.2. For the purposes of this audit, the AFS supplier will provide AFS's employees and independent representatives with reasonable access to relevant information about the AFS supplier's policies and procedures. The AFS supplier's reasonable costs and expenses may be charged to AFS if more than 2 days of man effort by the AFS supplier are required in relation to the relevant audit. Unless otherwise agreed in writing, AFS will not be entitled to audit other confidential information of the AFS supplier, including: (a) information about other clients or business partners of the AFS supplier; (b) cost or pricing information; (c)

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internal employee surveys or survey results; (d) employee demographic information; (e) information about grievances or legal claims; (f) legally privileged advice; or (g) non-public personal data relating to employees (including individual training records). AFS will not be entitled to interview randomly selected AFS supplier employees.

- 7.3. AFS shall notify the AFS supplier if any matters of concern are identified by its audit, and the parties may agree to meet to discuss such concerns.

8. Violation of These Standards of Conduct or Applicable Laws

- 8.1. Failure to comply with these Standards of Conduct or with applicable laws will entitle AFS to immediately terminate the AFS supplier as a supplier to AFS and/or to disclose the matter to appropriate authorities, regulators, and/or law enforcement bodies. If permitted by applicable law, AFS will inform the AFS supplier of the matter and give the AFS supplier a reasonable opportunity to respond before AFS discloses the matter to the relevant authority, regulator, or law enforcement body.
- 8.2. AFS suppliers encourage a culture of transparency within their organization and supply chain and encourage employees to speak up with legal and ethical concerns, both through line management channels and/or formal reporting channels. AFS suppliers must report suspected violations of these standards by the AFS supplier (or by its own employees, contractors, sub-contractors or suppliers). AFS suppliers must also report any specific issue of which they become aware regarding AFS's financial affairs, accounting practices, auditing matters, corruption or fraud, or any behavior by AFS employees which is inconsistent with the standards set out in this Code.
- 8.3. Such reports must be made to the Accenture Business Ethics Helpline, where you may report your good faith concern via the web or obtain country-specific phone number to speak with an agent 24 hours a day, seven days a week: <https://businessethicsline.com/accenture>. In most cases, you may remain anonymous when using the Accenture Business Ethics Helpline. AFS suppliers must prohibit any retaliation against any AFS supplier employee who: (1) comes forward to raise, in good faith, a concern about a violation of any law and/or any violation of these Standards of Conduct; or (2) assists AFS, or a law enforcement authority, by providing information to address a concern. In these Standards, "**retaliation**" means unfair treatment of any kind that follows from the raising of a good faith concern (or any threat of such unfair treatment).
- 8.4. Subject always to AFS's disclosure rights in Section 8.1, AFS treats all allegations seriously and in strict confidence. Depending on the nature and circumstances of the allegation, AFS may seek to work – if and when appropriate – with the AFS supplier and other affected parties in order to reach a proper and timely resolution.
- 8.5. AFS suppliers can report fraud, waste, or abuse to the Government's Fraud, Waste, and Abuse hotline at 1-800-424-9098. Additionally, AFS suppliers in the United States may report concerns relating to human trafficking to the Global Human Trafficking Hotline at 1-844-888-FREE (3733) or at help@befree.org.

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NOTE: Nothing in these Standards or in any agreement with AFS is intended to prohibit (with or without notice to Accenture) reporting possible violations of laws or regulations to a governmental agency, regulatory body, or a local authority, or from making disclosures that are protected under whistleblower laws and regulations.

AFS reserves the right to update these standards from time to time to reflect changes in the regulatory or business climate

Where to Go for Additional Information and Help

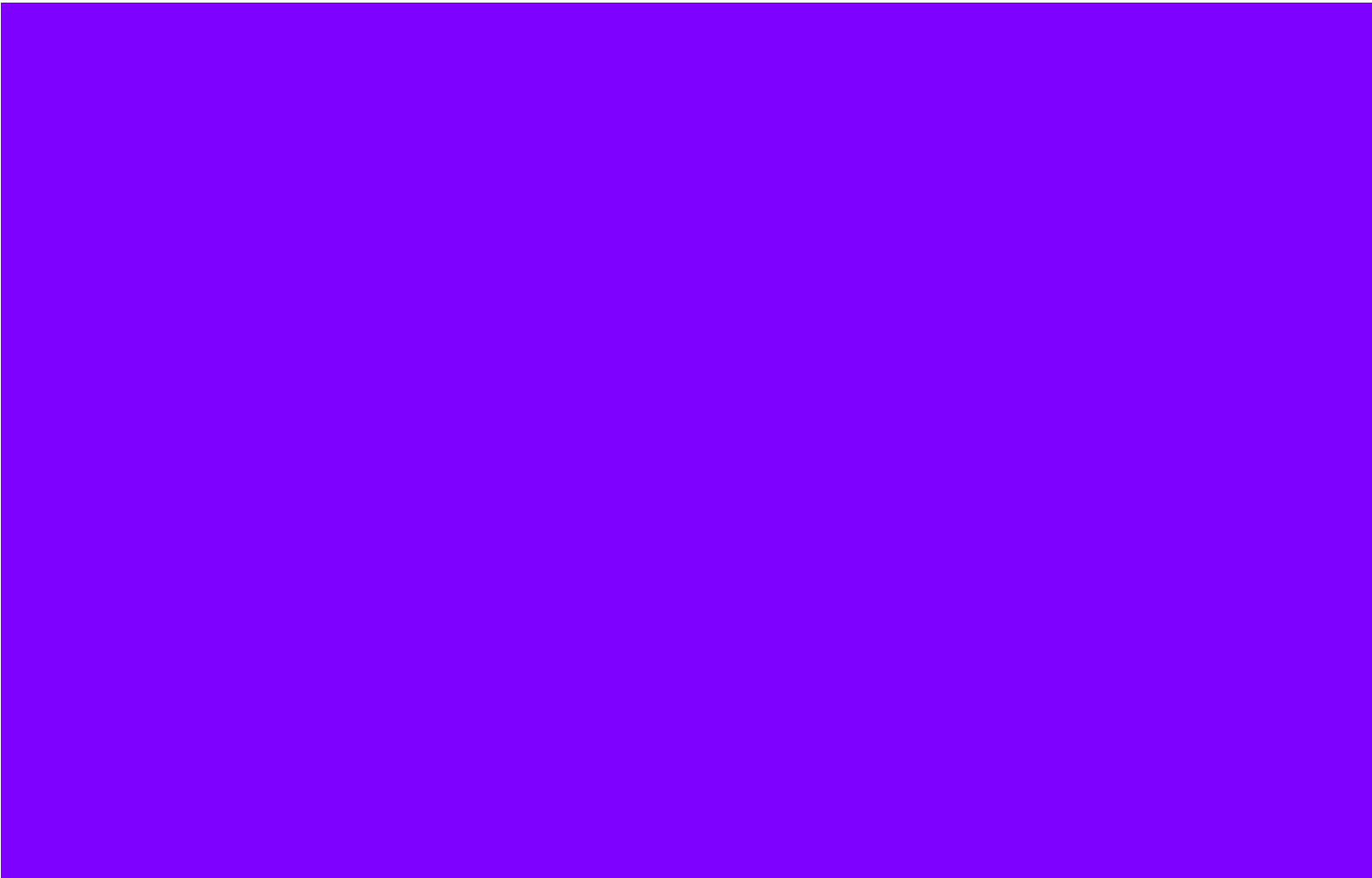
Accenture Code of Business Ethics

Accenture Core Values

Standards of Federal Business Ethics and Conduct

If you have questions about our Supplier Standards of Conduct, please contact your AFS Procurement representative.

Access to Accenture's Code of Business Ethics, the Standards of Federal Business Ethics and Conduct, these standards, or Accenture/AFS training shall not be construed as, and in no way implies that, supplier employees are employees of Accenture; the essential terms and conditions of supplier employee employment continues to be the sole responsibility of and governed by the supplier.



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