

Ahead



MANAGEMENT GROUP

Supplier Code of Conduct

Building fair and effective standards into our business



Table of Contents

Document Control	4
Document History	4
Signatories	4
Document Storage	4
Background	4
Purpose.....	5
Authority	5
Core Code of Conduct.....	6
People	6
Our Team, Our Employees.....	6
Equality, Diversity and Inclusion.....	6
Bullying.....	6
Human Rights.....	6
Modern Slavery Act 2015	6
Forced Labour	6
Child Labour	6
Working Hours.....	7
Ethos and Values	7
Values.....	7
Mission	7
.....	7
Anti-Bribery	7
Gifts and Hospitality	7
Conflict of Interest	8
Competition and Anti-Trust	8
Society and wider footprint	8
Health and Safety	8
Environment.....	8
Charity.....	8
Our Property	9
Financial Crime Compliance.....	9
Confidentiality	9
Personal Data	9
Compliance	9

Copyright © 2023 Ahead MG

This document and the themes contained within are the intellectual property of Ahead MG. No parts of this document may be used or reproduced without express permission of Ahead MG. This document is intended for the recipients only and not for onward distribution without express permission of the author.

AheadMG Ltd 4th Floor, Silverstream House, 45 Fitzroy Street, Fitzrovia, London, W1T 6EB

Management@aheadmg.co.uk

Document Control

Document History

	Author	Version	Description
07/04/2016	Andy Ewell	v0.1	Initial Draft
05/06/2017	Andy Fox	V0.2	Reviewed at board meeting, minor amendments.
07/06/2017	Andy Fox	V1.0	Baselined version
12/09/2018	Andy Ewell	V1.1	Added Text covering GDPR Updated AheadMG business address.
19/07/2019	Neil Hickman	V1.2	Minor updates for 2019
18/02/2022	Donna Chapman	V1.3	Minor updates for 2022
29/07/2022	Donna Chapman		Office Address Change
05/08/2022	Donna Chapman	V1.4	Minor updates
24/08/2023	Donna Chapman	V1.5	Minor updates for 2023

Signatories

Name	Role	Sign off Date
Andy Ewell	AheadMG Delivery Director	05/06/2017
Neil Hickman	AheadMG Finance Director	05/06/2017

Document Storage

All versions of the policy will be stored on our website <https://www.aheadmg.com/new-starters/>

Background

AheadMG specialise in a range of test & management consultancy services, often deploying individuals or services into companies operating in common markets or using common technologies.

Whether direct to the end client or via the client's intermediaries it is essential that AheadMG build effective and trusted relationships. Our Suppliers include;

- Companies who provide operational support;
 - Facilities / office / accountancy;
- End Clients where AheadMG candidates/resources/services are placed;
- Regulator/Revenue;
- Intermediaries acting on behalf of an end client;
 - Employment business / Resource administrator;
- Candidates which we place;
 - Individuals / Limited Companies.

AheadMG continually strive to deliver high performance for our clients and our company. AheadMG is committed to upholding the highest ethical and professional standards consistent with our values and our Code of Conduct.

AheadMG strongly encourages suppliers to exceed the requirements of this Code and promote best practices and continuous improvement throughout their operations.

Purpose

The overall objective of the Supplier Code of Conduct is to build trusting and open relationships between AheadMG and their suppliers in order to drive improved performance and value for money for all involved. This Supplier Code of Conduct acts in a reciprocal way in respect of our suppliers and sets out the behaviours we would expect of each other.

In selecting suppliers, AheadMG works hard to choose reputable business partners who are committed to ethical standards and business practices compatible with our own.

Authority

This policy is owned and reviewed by the AheadMG Board of Directors.

Core Code of Conduct

People

Our Team, Our Employees

AheadMG is a niche employment and specialist Test & Management Consultancy which operations in the UK. The individuals who form the team may be culturally different or from different parts of the world, this diversity is championed and encouraged in AheadMG.

Equality, Diversity and Inclusion

The employees of AheadMG represent a talented and diverse workforce. Achieving the full potential of this diversity is a business priority that is fundamental to our competitive success. A key element in our workforce diversity and inclusion programs is AheadMG's long-standing commitment to equal opportunity.

The aim is for our workforce to be truly representative of all sections of society and our customers, and for each employee to feel respected and able to give their best.

For more information please refer to our Diversity and Inclusion Policy also documented at <https://www.aheadmg.com/new-starters/>

Bullying

All staff should understand they, as well as their employer, can be held liable for acts of bullying, harassment, victimisation and unlawful discrimination, in the course of their employment, against fellow employees, customers, suppliers and the public.

For more information please refer to our Diversity and Inclusion Policy also documented at <https://www.aheadmg.com/new-starters/>

Human Rights

AheadMG aim to operate in accordance with the Universal Declaration of Human Rights as well as other international standards, including the Organisation for Economic Cooperation and Development Guidelines for Multinational Enterprises and International Labour Organization Core Conventions.

Modern Slavery Act 2015

AheadMG believes all work must be voluntary and workers should have the freedom to terminate their employment in accordance with established laws, regulations and rules. The workplace shall be free of any form of harsh or inhumane treatment.

In compliance with s.54 of the Modern Slavery Act 2015 our Code of Conduct includes a Modern Slavery Statement. This sets out the formal steps taken by AheadMG to prevent slavery or human trafficking from taking place in our supply chains.

Forced Labour

All work must be voluntary and workers should have the freedom to terminate their employment in accordance with established laws, regulations, and rules. The workplace shall be free of any form of harsh or inhumane treatment.

Child Labour

AheadMG does not use child labour and it expects its suppliers to do the same. We expect our suppliers to comply with local laws regarding the minimum age of employees

Working Hours

Suppliers must ensure that on a regularly scheduled basis, except in extraordinary business circumstances, workers are not required to work more than 60 hours a week, including overtime. Suppliers must ensure that all overtime work is voluntary and compensated at the prevailing overtime rates. In addition, except in extraordinary business circumstances, all workers are entitled to at least one day off in every seven-day period.

Ethos and Values

Values

At AheadMG we have three simple values that are instilled within our organisation;

- Delivery excellence;
- Trusted by all;
- Building stronger relationships;

Centring on a delivery-led approach AheadMG provides bespoke services that seek to do what's best for the client, no matter what. Our business is our reputation, underpinning a single-minded desire to provide the best possible outcome for the client enabling them to engage AheadMG to support their core business objectives.

Mission

AheadMG Background

UK Wealth Management Platform Domain Experts & Test Specialists

Faster to Market

Adaptive Approach

Domain Experts



Established in 2010 our mission is to provide...

Centring on a delivery-led approach AheadMG provides bespoke services that seek to do what's best for the client



ORGANISATION INTEGRATION

Creation of frameworks that drive programme collaboration to meet delivery goals.



SOLUTION INTEGRATION


Development and delivery of dynamic approaches that enhance solution integration




INTEGRATED SERVICE

Providing a complete delivery service in all Software Development disciplines.

Our Services

-  **Programme Management**
Complete cradle to grade management of large scale programmes, from initiation through to implementation.
-  **Analysis & Design**
Effective Business Analysis utilising latest approaches and techniques.
-  **Development**
Deployment of a range of development skills to deliver high quality code quickly to market.
-  **DevOps & Environments**
Building out and supporting modern development environments to support rapid and safe deliveries.
-  **Test Management**
Proven Test Processes which can scale accordingly. Real time control based on custom measures.

"AheadMG have excellent platform domain knowledge"



"AheadMG proved to be a strong and collaborative partner"



E2E COVERAGE
Our variation consultancy practices provide complete coverage of the SDLC



DOMAIN EXPERTS
Embedded SME knowledge of the financial sector, specialising in Wealth Platforms

Effective, managed, safe Test deliveries



PROVEN CAPACITY
AheadMG will seek to improve delivery outcomes, cost certainties and regulatory and governance confidence



TRUSTED PARTNER
Working with our clients to achieve excellence

Anti-Bribery

It is AheadMG's policy to conduct its business in an honest and ethical manner. AheadMG takes a zero-tolerance approach to bribery and corruption and is committed to acting professionally, fairly and with integrity in all of its business dealings and relationships wherever the company operates. This applies to all individuals working at all levels and grades, and includes all employees (whether permanent, fixed-term or temporary), staff, consultants, contractors, trainees, seconded staff, homeworkers, casual workers and agency staff, volunteers, interns, agents, sponsors, or any other person associated with us, or any of our subsidiaries or their employees, wherever located.

Gifts and Hospitality

All employees of AheadMG must register any gifts or hospitality given or received with an estimated value in excess of £50 with one or more of the Directors of AheadMG. Written approval must be obtained (which includes

by e-mail) in relation to any hospitality given or received with an estimated monetary value in excess of £50. AheadMG recognises that the practice of the giving and receiving of business gifts or hospitality varies between industries and regions and what may be normal and acceptable in one region may not be in another. The test to be applied is whether in all the circumstances the gift or hospitality is reasonable and justifiable. The intention behind the gift or hospitality should always be considered. This policy does not prohibit normal and appropriate hospitality (given and received) to or from third parties, for the purposes of establishing or maintaining good business relationships or improving or maintaining our reputation or image.

Suppliers should not provide any gift, meal or entertainment to a company employee in any situation in which it might influence or appear to influence any employee decision in relation to the supplier. In other situations, suppliers may provide modest gifts, meals or entertainment to company employees if they are:

- not cash or cash equivalent;
- consistent with customary business practice and supplier company policy;
- not frequent or expensive;
- do not violate any law.

Conflict of Interest

Conflicts of interest run counter to the fair treatment AheadMG expect. They can also break the law and seriously damage AheadMG integrity and reputation. A conflict of interest occurs when your private interests interfere, or appear to interfere, with the best interest of AheadMG.

Suppliers should avoid any interaction with any AheadMG employee that may conflict or appear to conflict with that employee acting in the best interests of AheadMG.

Competition and Anti-Trust

Competition and anti-trust laws prohibit a variety of business practices that restrict free and fair competition, such as bid rigging, price fixing, cover pricing or market sharing. Violations of such laws are very serious, and can result in significant fines and other penalties. Individuals can face prison. AheadMG are committed to free and open competition in our markets. AheadMG compete fairly and ethically, and support laws that promote and protect competition.

The decisions AheadMG make about pricing, customers, bids and markets are taken by us alone.

Society and wider footprint

Health and Safety

Under section 2 (3) of The Health and Safety at Work etc Act 1974, all companies that employ more than five employees are obliged to provide, maintain and review as necessary a health and safety policy.

For more information please refer to our Health and Safety Policy also documented at <https://www.aheadmg.com/new-starters/>

Environment

AheadMG aims to fully meet all its legal obligations to the environment and will work continuously to achieve the best environmental operating practices within the fields it operates. We recognise the threat posed by climate change and are seeking to reduce our carbon footprint accordingly. For more information please see our Environment and Sustainability policy also documented at www.aheadmg.com/new-starters.

Charity

AheadMG commits to donating 1% of its annual profits to charitable causes, selected and chosen by the AheadMG employees. The selected Charities should comply and be in keeping with the items laid out within this code of conduct and AheadMG wider values.

Our Property

AheadMG is committed to being a sustainable and reputable business.

Financial Crime Compliance

Our policies are clear, no employee will engage in any activity that is designed, or can be reasonably construed, to perpetuate a fraud or evade taxes. We expect our suppliers to meet these same standards. Fraud is a criminal offence in most countries. Whilst its definition varies across these countries, fraud always involves deception and dishonesty. It's fraud when you deliberately try to deceive someone, act dishonestly or abuse your position to gain any kind of material advantage, or use or involve anyone else to do so. Fraud is usually carried out for profit, or to obtain money, property or services unjustly. It can involve defrauding the company or a third party. AheadMG Suppliers will never knowingly seek to gain any advantage of any kind by acting fraudulently, deceiving people or making false claims, or allow anyone else to do so on your or AheadMG's behalf.

Financial Crime Compliance, including both the Bribery Act 2010 and the Criminal Finances Act 2017 are becoming increasingly important in the UK. AheadMG is pro-active with its governance policies and procedures throughout the business for internal management, finance and administration teams as well as client facing delivery teams.

Regular checks and training for Financial Compliance include Anti-Bribery and Corruption, Tax Evasion and Anti-Money Laundering.

Confidentiality

All organisations have a need for confidentiality in some of their business operations. Our policy (See maintaining Confidentiality policy for full details) addresses how AheadMG will manage, handle, and control confidentiality in day-to-day business.

AheadMG policy establishes a clear, reasonable and fair standard for confidentiality applicable to AheadMG associates and/or employees. Stakeholders, through the policy, will understand the kind of information deemed confidential by AheadMG or its clients, how they can mark information confidential, how they should handle AheadMG confidential information, how they can appeal the designation of material marked confidential, and how breaches of confidentiality will be handled. The AheadMG Confidentiality Policy will minimise the potential for confidential, sensitive and proprietary information or data to be compromised. Furthermore, the policy will minimise the risk of AheadMG associates and / or employees being accused of inappropriate activity or the appearance of impropriety.

Personal Data

Compliance with the data privacy and protection laws is fundamental to any modern business. AheadMG, as an IT business, is averse to such risks and continuously reviews its controls, policies and procedures to ensure compliance with industry standards or client specific requirements.

Data Protection Laws means any data protection laws which apply to the provision of the Services including without limitation the General Data Protection Regulations (Regulation (EU) 2016/679) ("GDPR") and the Data Protection Act 2018, as amended or updated from time to time, and any successor or secondary legislation to the GDPR or the Data Protection Act 2018.

Further information is documented in AheadMG's Privacy Policy, which is available with this document.

Compliance

Suppliers should communicate, through its existing ethical operating standards/ practices or through this Code that its workers, supervisors and its permitted subcontractors are aware of the requirements detailed in this Supplier Code of Conduct.

If you have questions about our Supplier Code of Conduct, please contact AheadMG at management@aheadmg.com.

AheadMG reserves the right to do such things as announced and unannounced inspections of facilities, to ensure compliance with this Code. Any potential shortcomings misaligned to this code which are identified, should be recorded with adequate and agreed plans in place to ensure timely remedy.