



ASCENTI

Ascenti Code of Conduct

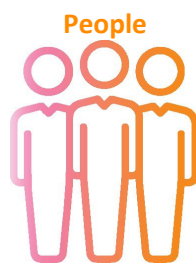
July 2024 V2.0

We are committed to being a responsible business, which is reflected in our belief that everyone should have access to high-quality, effective physiotherapy and wellbeing services. We play a vital role in empowering more people to breakthrough their physical and mental barriers to improvement.

Our vision is to provide services that are sustainable and low impact, whilst enhancing livelihoods and making society great. Our Social and Sustainability Strategy gives three simply pledges:



Cut our environmental impact in half by 2030



Enhance the livelihoods of our people



Improve health and wellbeing for all

We wish to work with all our stakeholders, including our supply chain, to follow our environmental, sustainability, social value, equality, accountability, and good governance principles in all our dealings.

This Code of Conduct is to ensure you are aware of our expectations and fundamental principles, and that these should extend into your own business and supply chain. You play an important part in helping us to create a more environmentally, socially, and economically responsible supply chain.

Sophie Harper,
Chief People & Communications Officer

Quality

We want to achieve the highest standards for everyone we work with. Quality sits at the heart of Ascenti – from every patient encounter through to the decisions we make for our business.



Pioneering

We're a passionate bunch of people, who aren't afraid to innovate and try new ideas to raise the bar.



United

We believe that unity lifts us above the competition, so we work together with partners, teams, and communities.



Caring

We care about what we do and want to achieve the highest standards for everyone we work with.



Dependable

We deliver on our promises and provide accessible, reliable, and effective treatments that are a cut above.

These shape how we behave and how we work with everyone, working to deliver the best services for all. We operate robust governance systems and a quality management system in line with the requirement of ISO 9001. We continually evaluate our services to improve the quality we provide. We expect our suppliers and partners to also operate processes and systems that focus on improving quality of their services.

Ethics and Standards

We maintain the highest standards of employee conduct and ethical behaviour and we require the same standards from you. We achieve this by encouraging a culture of openness, transparency, and candour. This promotes communication and provides opportunity for people to speak freely and constructively on any concerns.

Examples of unethical behaviour include (but are not limited to):

- victimisation
- bullying
- corrupt business practices
- fraud
- discrimination
- any unfair practices committed at a personal or corporate level
- harassment
- bribery

If you believe that any person, employee, contractor or third party, has acted unethically or unlawfully, you must immediately notify us. You can use SafeCall Limited's 24/7 Whistleblowing Hotline 0800 915 1571 (or, if you are outside the UK, +800 7233 2255 or +44 191 516 7749). You will be protected where a concern is raised in good faith.

Fraud, bribery, and corruption

We ensure that our financial and administrative processes are carried out and reported honestly, accurately, transparently, and accountably and that all decisions are taken objectively and free of personal interest. We expect our suppliers to also strive to meet this standard and we do not condone any behaviour that falls short of these principles.

We have a zero-tolerance policy to any unethical behaviours and practices, and we have strong policies and procedures in place to back this up. We expect you to also have a program in place to prevent these activities, in particular in regard to all applicable laws and regulations.

We require you to have processes in place to protect "whistleblowing", including a confidential and anonymous reporting process. We ask that you inform us of

activity that could be deemed inappropriate so we can work together.

Gifts, hospitality, entertainment and cash rewards

We require your assistance to help us enforce our rules on an employee receiving a business reward. Some clients may wish to show their appreciation by offering an employee a gift or hospitality. It is reasonable for such a gift or hospitality to be accepted as long as it is (a) transparent (b) proportionate (c) reasonable and (d) *bona fide*. However, the best way to avoid a conflict of interest is to not offer a gift, reward, hospitality, or entertainment to our employees unless it is provided with the intention of developing the general business relationship or is provided for general continuous professional development.

Endorsements

We ask you not to publicly display or advertise your relationship with us or use or display our logo or other corporate materials, unless agreed in writing by us in advance.

Social media

Social media is an important part of how we communicate and promote services. We actively encourage employees to make reasonable and appropriate use of social media as part of their work. We have a dedicated Communications Team who provide guidance and safeguards for using social media effectively, including information monitoring the same. We expect you to use social media responsibly and respectfully, and any comments you make must align with our ethical values.

Risk Management

We identify, manage, and minimise events or activities which could result in unnecessary risks to patients, staff, visitors and the public. This is a key organisational responsibility of all staff and we expect you to similarly operate in ways that systematically evaluate and minimise risk.

Health and Safety

We ensure the health, safety and wellbeing of employees, contractors, and visitors. Work environments are maintained in accordance with statutory requirements and all equipment is maintained. Where risk exists, we actively seek to manage it and monitor any arrangements for safety. All statutory obligations are observed. We expect the same commitment from you.

Sustainability and the Environment

Sustainability is an integral part of our operations, ensuring we consider the impact of business operations and decisions. We operate an effective Environmental Management System (ISO 14001: 2015 *Environmental Management Systems – Requirements with guidance for use*) and meet the criteria defined within “The Energy Savings Opportunity Scheme (ESOS): phase 3 2023”. We have built upon our environmental commitments as we recognise sustainability includes cultural, economic, and social aspects also. We expect you to support us in this approach as we are all responsible for protecting the environment. As a minimum we require you to:

- meet all legal and compliance obligations;
- either have ISO 14001 accreditation, have in place an environmental management system that is aligned to the requirements set out in ISO 14001, or have a system proportionate to the size of your organisation;
- ensure that any activities that have an impact on natural habitats are conducted in a manner to protect biodiversity; and
- assess ways to reduce the impact of climate change on your activities.

We target ourselves to reduce our environmental impact in half by 2030. We encourage you to align to targets aimed at limiting global temperature rise (1.5°C).

Business continuity

We have in place a robust and tested business continuity and disaster plan that:

- deals with the identification of risk, impact and critical systems including a full business impact assessment,
- provides an escalation framework;
- sets out our principles of prevention and mitigation; preparedness and readiness; response; recovery; and lessons learned.

We expect everyone within our supply chain to have such policies and procedures in place and for these to be reviewed and tested at least annually. As a minimum, these policies and procedures should cover loss of people, premises, and equipment (including information and technology).

Data protection

Our staff are involved in controlling and processing information that is personal, sensitive, and confidential. We therefore ensure that the rights and privacy of individuals are upheld and respected. We also comply with all relevant data protection legislation including the General Data Protection Regulations, the requirements of ISO 27001: 2013 *Information Security Management Systems - Requirements* and with best practice standards.

We risk assess and carry out due diligence on our suppliers to ensure they meet our required standards. We expect you to:

- comply with the 7 data protection principles (as set out in the Information Commissioner’s Office (ICO) website [here](#));
- implement organisational and technical measures to ensure the integrity and confidentiality of personal information and provide independent assurance over the controls related to the services; and
- if required, co-operate with, and assist on data protection impact assessments or compliance matters which relate to the processing activities being carried out by you on our behalf.

Security

We have ISO 27001 certification (ISO 27001: 2013 *Information Security Management Systems - Requirements*). In addition to ensuring our networks and data are secure from unauthorised access and failure including the hardware and software used and the operational processes followed to detect and prevent such threats, we also ensure our premises are secure from unauthorised access, thus preventing any physical theft of any information and systems.

We expect our supply chain partners to demonstrate similar commitment to security and have as a minimum:

- policies and procedures in place covering your people, process and technology;
- security controls proportionate to the risk, in support of your policies and procedures;
- either have independent assurance that security controls are in place or have in place the necessary information management systems that are aligned with such a certification;
- have suitable detection controls in place for security breaches of any kind;
- a pathway in place on how you respond to security incidents and events.

In order to maintain our ISO 27001 certification, we require the cooperation of our suppliers. As part of our due diligence, suppliers must be aware of the controls set out in ISO 27001:2013 Annex A and you may need to:

- work closely with us to establish appropriate information security standards;
- work with us to provide information requested by relevant authorities to ensure we are compliant with relevant laws and regulations.

Human rights, Equality, Diversity, and Inclusion

We:

- have a zero-tolerance approach when dealing with discrimination,

harassment or bullying;

- strive to ensure that our values are reflected in our culture;
- create a safe working environment;
- strive to be a business which is accessible to all who require our services;
- are committed to providing equal opportunities in employment; and
- recognise that we have a responsibility to take a robust approach to modern slavery and human trafficking.

We expect all companies in our supply chain to share our approach and commitment, and as an absolute minimum comply with the:

- Equality Act 2010;
- Modern Slavery Act 2015 (we encourage you to publish your modern slavery statement regardless of whether this is a legal obligation or not);
- Working Time Regulations 1998;
- National Minimum Wage (Amendment) Regulations 2021;
- Health and Safety at Work etc Act 1974.

In meeting these expectations, you should have a full understanding of your business operations and wider supply chain, and ensure that any potential human rights risks are assessed, managed, and mitigated.

Community and workforce

“People” is one of our three pledges and to us that means:

- Training and development
- Fairness in the workplace
- Work life balance
- Family friendly working
- Opportunities for everyone

We make sure our economic and social role in the community has the greatest possible positive impact. We expect suppliers to be aware of how their activities impact their local area and wider community. We encourage you to make positive contributions and investments where appropriate, for example we do community time gifting. We expect our suppliers to build positive relationships and minimise disruption to communities.

Being committed to skills development, most of our managers are homegrown talent and our training and development is unrivalled. We expect our suppliers to support the development of their workforce to meet future needs and to have a focus on formal training programs. For example, use of apprentices, graduate schemes, and development/training programmes.

Supply chain

Where your contract with Ascenti allows you to sub-contract work or services to a third party, we require that:

- they are informed of this Code of Conduct, and they agree to adhere to it;
- risk assessments with proper due diligence are performed;
- you are responsible for any and all acts of any sub-contractor; and
- you provide evidence upon request that the above has been completed.

Legal Compliance

We expect any person or company working with us to comply with all applicable laws, legislation, and regulations. This includes all previously mentioned laws and, but is not limited to:

Modern Slavery Act 2015	Criminal Finance Act 2017	Bribery Act 2010
Competition Act 1998	Fraud Act 2006	Enterprise Act 2002

Tax compliance: We will not work with suppliers who engage in any practice that may constitute tax evasion or involve workers not being taxed appropriately.

We expect you to comply with the off payroll working rules (IR35) which came into effect in 2021. To optimise compliance, individuals must only be engaged in providing services via a personal service company (PSC) within our supply chain in exceptional circumstances.

You must inform our People Team before any individuals are supplied to us to whom IR35 may apply. Failure to do so could place us both at risk of being in

breach of tax law. We reserve the right to require the immediate removal of any individuals providing services via a PSC without approval.

Sanctions: Sanctions lists maintained by the United Nations, the EU, and the United States among others must be adhered to at all times.

Modern Slavery: We expect our suppliers and partners to take modern slavery as seriously as we do. You can read our modern slavery policy on our [website](#).

Accountability

We require you to review and evaluate your activities to ensure you are keeping to this Code of Conduct. You should have processes in place to remedy non-compliance, breaches or problems identified through audits, reviews, or inspections. We maintain certification to ISO 9001: 2015 *Quality Management Systems – Requirements* and expect you to also maintain an effective quality management system aligned to the requirements of this standard, where applicable.

We expect you to investigate and report any concerns or complaints you have about laws or standards being broken which relate to our business, sub-suppliers or sub-contractors so we can then investigate.

You should have suitable training in place for key personnel working with us, introducing this Code of Conduct and its provisions alongside your relevant policies and procedures.

We reserve the right to request evidence of your compliance to the matters set out in this Code of Conduct for the duration of your dealings with us. If you are unable to provide the same, or upon review we have serious concerns, we will review our relationship with you.

If you have any concerns regarding this Code of Conduct, please contact Ascenti's People Team (people@ascenti.co.uk)