



## Message from our Managing Director

The collective effort of every individual within the Group means we can proudly boast a reputation as a market leading provider of quality service. It is this reputation which earns us the continued business of our customers and the trust of the community. The importance of maintaining this reputation is why the Group are committed to upholding the highest standards of business conduct and ethics.

With this in mind, it is vitally important that we all understand what is considered acceptable practice when operating or working on behalf of the Group. I would therefore like to draw your attention to our Code of Business Ethics (the "Code"). Our objective in producing the Code is to ensure that our interactions with colleagues, customers and the community in which we work are based on strong ethical foundations. Outlined below are just some of the ways in which we can all contribute towards this.

Whilst the Code cannot deal with every circumstance, it is intended to create a framework to help us decide how to behave. Please take some time to familiarise yourself with it, and do not hesitate to ask questions or voice concerns if you are unsure as to whether any conduct may violate the Code. With the commitment of every employee and the support of business partners the Code will play an important role in the continuing success of the Group.

## What does the Code contain?

The Code sets out the ways in which we should behave and outlines standards that we expect each company or individual we do business with to adhere to. All suppliers, advisers, customers, contractors and consultants (together referred to as "Business Partners") should act within the spirit of the Code, notwithstanding any other contractual arrangements which may have been agreed. This Code is not designed to take precedence over any contractual agreement but is designed to help enhance our relationship with our Business Partners and guide our Business Partners to make decisions as to what is appropriate conduct.

Supporting this Code are separate policies that our employees must additionally personally comply with. All policies are available on our Intranet site and set out in more detail how we should conduct ourselves and our business. They underline the important message that behaving responsibly, and ethically, is an integral part of our business. As such it is the personal responsibility of each employee, as well as an important duty of line management to monitor compliance.

## Our Values

Our values are a set of defining characteristics and governing principles by which we operate both individually and as a business. They define how we should behave with each other at an individual level and how the Group manages its corporate interactions with its Business Partners.

**Focus** Our Group is all about people and our customers are essential to our success. We will **focus** on delivering total customer satisfaction by understanding what our customers want and deliver it flawlessly.

**Innovation** We are committed to **innovation**. We will continually improve our skills, services and technologies and be creative so that, together, we are the best we can be.



<b>Respect</b>	We care about the people around us. We will show <b>respect</b> for colleagues, customers and partners; for the environment within which we operate and the local communities from which we all come.
<b>Standards</b>	we set our <b>standards</b> consistently high. We care about the service we provide and the data that we handle. We will strive for continuous quality improvement in all that we do and focus on getting things right first time.
<b>Team Spirit</b>	Our <b>team spirit</b> plays a vital role in our success. We will show consideration for others' needs and an awareness of the impact of our actions.

## OUR CODE

### Compliance with the law

Our employees and Business Partners are required, as a minimum standard, to comply with all laws and regulations. Obeying the law, both in letter and spirit, is the foundation of this Code. Employees should seek advice on legal and regulatory requirements from their line manager or the Legal team. Business Partners should obtain independent legal advice where necessary. We shall also remain mindful and act in accordance with relevant Codes of Conduct and Policies that mandate standards of accepted ethical behaviours, such as the MedCo Ethics Policy.

### Competing fairly

The Group strives to outperform its competition fairly and honestly. We believe in competing fairly. We do not engage in, nor are we party to, agreements, business practices or conduct that, as a matter of law, are anti-competitive. The Group condemns corruption in all its forms and we will not tolerate it in our business or in those we do business with.

### Treating others fairly

We treat our Business Partners in a fair and reasonable manner and we do not use aggressive commercial practices. We expect our employees and Business Partners to act lawfully and ethically, and in accordance with the values and standards set out in this Code.

We believe in working in partnership with our Business Partners, so as to meet the expectations of customers, and to ensure quality, value and compliance throughout our supply chain. We seek to provide our customers with a service which exceeds their expectations, through the application of quality assurance activities.

### Equality and Diversity

We are committed to eliminating unlawful discrimination and to promoting equality, diversity and inclusion within our workplace. We shall treat everyone equally and with the same attention, courtesy and respect regardless of any factor. We have a Group Equality, Diversity & Inclusion Policy which outlines our core principles.

We have a confidential process in place for employees to report any concerns which will be fully investigated. We provide training and communication on this annually to all employees.



This applies to all professional dealings which include but are not limited to the following:

- Customers;
- Employees and directors;
- Workers and contractors
- Suppliers / experts;
- Relevant government bodies/regulators;
- Third parties, including claimants/patients.

### **Acting with honesty and integrity**

As a Group we will act and expect our employees to act with honesty and integrity at all times to safeguard the trust which is held by our Business Partners and other individuals and organisations with which our Group interacts.

The Group has a zero tolerance policy for any practice that is, or might reasonably be construed as, corrupt or involves bribery. We do not offer, promise, give, demand or accept bribes or other unethical advantage in order to obtain, retain, or achieve any other advantage. Further information is set out in our Anti-Bribery and Corruption Policy.

No employee shall engage in personal activities or pursue financial or business interests which might give rise to, or give the appearance of, conflicts of interest with or which might compromise their ability to meet the responsibilities of their job.

In addition, employees should interact with integrity and respect on social media or when communicating on a public platform. Please refer to the Group Social Media Policy for further information.

### **Confidentiality**

As a Group we are committed to the security and confidentiality of the information we handle and process. As part of this commitment the Group has successfully achieved certification with the ISO 27001:2013 international information security standard across its Bolton and Durham sites.

Employees and Business Partners who have received or have access to information, in particular information classified as personal, personal sensitive or confidential, should take care to keep this information secure. This includes non-public information that might be of use to competitors or harmful to the Group or its customers if disclosed. We may also be required to protect this information as part of our legal requirements.

Employees will be expected to adhere to controls outlined in the Group Policy Framework, in particular the policies in relation to information security and data protection. Business Partners are required to familiarise themselves with and comply with all applicable laws as well as any specific instructions from the Group when they process and handle any information on behalf of the Group.

Employees and Business Partners who have access to privileged and/or confidential information must not disclose such information, use it to achieve personal gain for themselves or use it for any reason other than that which is necessary to perform their function.

**Treating others with respect**

All our employees and Business Partners are critical to the success of the Group and should be treated with respect and dignity. We do not tolerate harassment or bullying, whether by co-workers or third parties. We are an equal opportunities employer which recruits, selects and promotes employees on the basis of their qualifications, skills, aptitude and attitude. Further information for employees on issues of equality can be found in our Group Equality, Diversity and Inclusion Policy.

**Worker Protection**

All our employees and Business Partners should be able to operate in an environment free from sexual harassment. We have a defined risk assessment, annual training plan and reporting mechanism for any concerns that an employee should have, either internally or from third parties.

Our Business Partners must ensure that they operate in a manner free from sexual harassment and respond appropriately should feedback be delivered.

**Contributing to healthy, safe and secure workplaces**

We are committed to conducting all our activities in a manner which achieves the highest practicable standards of health and safety. We seek to protect our employees, visitors, physical assets, information and reputation from potential security threats and we require those who operate at our sites to comply with Health and Safety legislation.

Our employees and Business Partners must ensure proper and responsible use of all our assets, including physical property, intangible assets, IT equipment and communication resources.

**Wellbeing**

We believe that taking care of our own wellbeing ensures that we can contribute our best at work, and a healthy workforce is a productive one. We have a programme of activities that centres around employee wellbeing that is not just linked to physical and mental health. When issues are affecting our employees should seek available support through our channels of wellbeing.

**Respecting the environment**

Like many organisations, the Group recognises that our operations impact upon the environment. Through the identification of our most harmful activities, the Group is striving to lead the industry with new levels of environmental awareness, pledging a commitment to continual improvement. We are committed to ensuring that, as far as reasonably practicable, any detrimental effects to our activities, products and services upon the environment are minimised. The Group has successfully achieved certification in respect of the international environmental standard, ISO 14001 across its Bolton and Durham sites. As a Group we also comply with ESOS regulatory requirements.



Premex Group and UK Independent Medical Services have implemented a Net Zero strategy outlining our commitment to achieve Net Zero carbon emissions by 2030, with the intent to bring Kindertons Group into scope in the foreseeable future.

By setting this ambitious goal, we are demonstrating to our Customers, Employees, Supply Chain and the wider community that we are committed to reducing our environmental impact and becoming industry leaders in reducing carbon emissions.

For more information, please see our Environmental Policy and Net Zero Strategy.

### **Contributing to our communities**

In addition to the provision of employment opportunities, we contribute to the communities in which we operate by participation in, and support for, community and charitable initiatives. The Group's commitment to working with, and contributing to, the local community ranges from charitable support to sponsoring local sports teams. Initiatives include our 'Charity of the Year' and paid leave for staff to volunteer in the local community. For further details of how the Group works with the community, please see our Corporate Social Responsibility Policy.

### **High standards of record-keeping and reporting**

Comprehensive assessment and management of risk, together with strong systems of internal control are essential aspects of our business. We record all business transactions accurately and transparently to ensure that it is managed effectively and that reported results are accurate.

### **Application of the Code**

To ensure we operate in line with the principles of this Code as outlined above the Group have incorporated a framework to ensure all material business decisions have been evaluated to identify potential ethical risks and the outcomes of these assessments are formally documented. Please refer to the Group's Ethical Impact Assessment Framework for further information.

In addition to the above due to the surveillance based services offered in the ExamWorks Investigations Services business unit, there is an additional Surveillance Code of Conduct and a process to invoke an Ethics Forum to review and discuss any material ethical incidents or risks.

### **Obtaining Advice and Reporting Issues**

We expect and encourage employees and Business Partners to bring promptly to management's attention any suspected or actual breaches of our Code.

The nature of the breach will dictate the specific method for reporting, therefore it is necessary to consult the relevant policy should you wish to report a breach. Alternatively, any queries, requests for guidance or reports of alleged breaches in relation to the Code can be raised to the management team, Legal and Compliance or HR for employees. The Group has a Whistleblowing policy in place and procedures to ensure that individuals are able to report concerns and any concerns raised will be managed through a formal process of investigation.

Business Partners should raise any concerns with their contact point within the organisation or relevant Supplier Relationship Manager. Any such reports will be treated confidentially and investigated properly and promptly. We



expect all Business Partners to establish and enforce procedures that enable their employees to report any cases of non-compliance with this Code that may come to their attention. In addition, we require that all such reports are investigated appropriately and with due diligence.

Disregard or breach of the Code by an employee may result in disciplinary action. We reserve the right to hold Business Partners responsible should practices occur in their businesses which are not in line with the principles as embodied in this Code. Depending on the nature of the breach, the Group may have legal or contractual obligations to report such breaches externally, including but not limited to MedCo.

Our Code is not intended to replace existing policies or contractual obligations.

### **Governance**

The senior management team have overall responsibility for the Code and are responsible for establishing an appropriate system of internal controls which operate in line with this code to ensure process efficiency, accuracy and timeliness of company transactions and financial information; compliance with laws and regulations; and the prevention of fraud and abuse of company resources. Additionally, our management is responsible for understanding the risks to us and our stakeholders and taking necessary action to mitigate these risks. Please refer to the UK Governance Procedure for further information.

The Code has been approved by and has the full support of our board and executive management.