

# IVC Evidensia's Code of Ethics

We Care, We Dare, We Share



# Introduction

## Welcome to our Code of Ethics

Our vision is to become the best veterinary group in the world by delivering on our purpose of Healthy Animals, Happy Owners.

Our values of We Care, We Dare, We Share reflect the kind of organisation we want to be.

Our Code of Ethics brings our values to life, and helps us adhere to the highest standards.

The Code guides us to ensure animals receive outstanding care, clients are supported and colleagues can thrive.

Thank you for reading and applying the Code, and playing your part.



**Simon Smith**

**Group CEO**



# About our Code of Ethics

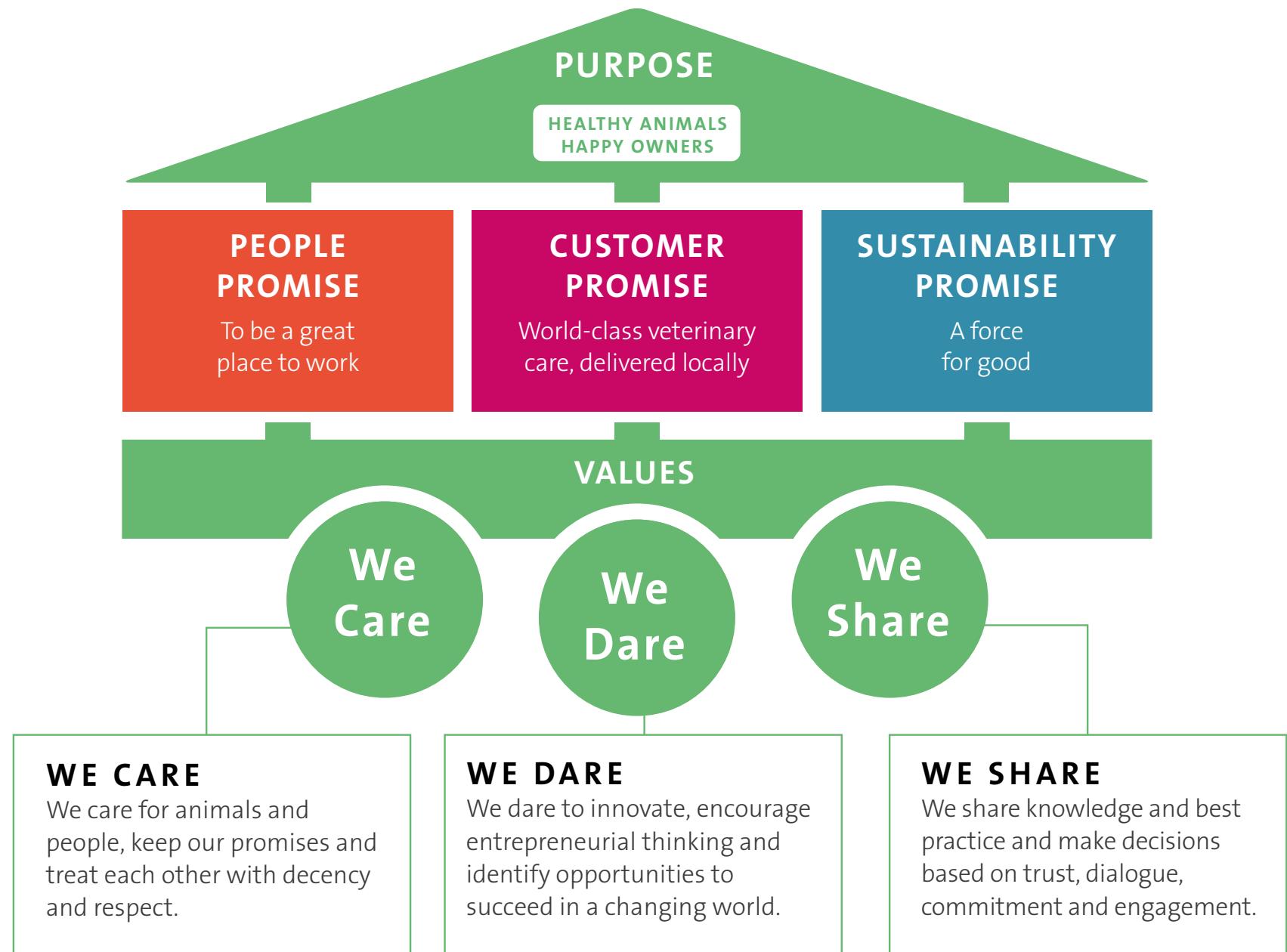


# How to use this Code

This Code provides clear guidelines on how we should conduct ourselves as part of IVC Evidensia, and we expect all of our employees to follow them.

We know that making the right decisions isn't just about knowing all the rules, and you may come across situations where the right way forward isn't always obvious. In those moments, this Code of Ethics is here to guide you.

By embracing this Code, we're making sure that our decisions reflect the values that define us.



# The Role of our Leaders

If you are a manager or leader, you play a key role in upholding this Code of Ethics. Leadership isn't just about making decisions when problems arise, it's about setting the standard everyday through your own actions that foster trust, care and collaboration.

- Discuss the values of our Code with your team and emphasize why ethical decision-making is essential.
- Use care, courage and collaboration when assessing whether a decision is the right one.
- Create a safe environment where team members feel comfortable to raise concerns and share their opinions.
- Welcome feedback and always look for ways to improve.
- Lead with humility and acknowledge any of your own mistakes, it fosters an environment of growth.
- Be a champion for diversity and inclusion by embracing different perspectives and valuing the unique contributions and experiences of everyone.

## Our Leadership Behaviours



## Our Shared Responsibility

We all share a responsibility when it comes to upholding the values of IVC Evidensia. This Code applies to all employees, whether you're in an office, working in clinics or out in the field. It's a key part of all our jobs to know how to make good decisions that reflect trust, integrity and empathy and follow the principles outlined in this Code.



# The Code in Action

- Looking after Each Other
- Acting with Integrity
- Caring for our Patients and Clients
- Caring for our Planet and our Communities
- Keeping Information Safe
- Speaking Up and Raising Concerns



# Looking after Each Other

Providing the best care in our industry starts with us, and the way we treat each other. As team members, we are IVC Evidensia's most important resource, and we need to care for one another. When we feel safe, and respected, we can make the right decisions for our business and our stakeholders.

## By creating a respectful work place

We are committed to creating a workspace where we all feel safe and supported. When we all work together to create a respectful and inclusive workplace, we are more likely to be empathetic and caring towards each other.

## By supporting well-being and mental health

The well-being of our employees is essential to building a caring and productive workplace. We are committed to creating an environment where we all feel supported and empowered to prioritise our physical and mental health.

## By embracing diversity and inclusion

We value the unique backgrounds, perspectives and contributions of every individual. We are dedicated to fostering a workplace where diversity is celebrated and everyone feels like they belong. Discrimination, bias and exclusion have no place in our workplace!



# Acting with Integrity

## By complying with Company Policies, Laws & Regulations

- Our company policies are designed to help us comply with the law and IVC Evidensia's high standards of integrity.
- We care for our own reputation as individuals and the reputation of IVC Evidensia's by following adhering to all company policies, laws and regulations.
- We seek guidance from the Compliance Team if we are uncertain.
- We comply with veterinary and other professional regulations where they apply to us.

## By Playing fair - don't accept or give bribes

- Bribes can take many forms - cash, vouchers, gifts, favours, perks- and we avoid them all. Fairness matters!
- Bribes can be given by or to anyone, but we must take extra care when they involve anyone with power or influence, such as people who work for the government because they could have more ability to give an unfair advantage.
- We hire people and work with partners based on merit, value and ethics. Our charitable donations are made with care, to legitimate causes and never to gain unfair advantages.
- Above all, we care enough to pause, ask questions and seek guidance when we are not clear.

## By managing Conflicts of Interest

- We avoid situations where our personal interests might influence, or appear to influence, the decisions we make at work.
- We always put the best interests of our patients, clients and company first.
- Here are some examples of how a Conflict of Interest could arise:
  - You own or have a financial interest in a supplier and are involved in decisions about purchases or partnerships.
  - You recommend or refer our clients to a business owned by family or friends.
  - You hire or manage a friend or family member without declaring it.
  - You have a side business, second job or external work that might impact on your IVC Evidensia responsibilities.
- So, if there's a chance there could be a conflict of interest, you must disclose this via our Conflict of Interest form for assessment. Certain conflicts of interest can be permitted provided they are properly disclosed, clearly managed, documented, and communicated effectively.



## By being responsible with Gifts & Hospitality

- We show care by making sure all gifts, meals and travel are appropriate in value, clearly tied to a business purpose and properly disclosed when needed.
- We accept and offer only reasonable and appropriate gifts, meals and entertainment and only if permitted under company policy.
- We never accept cash gifts or equivalents (vouchers, pre-paid cards, lottery tickets etc.)
- We accurately track and report any gifts, invites to hospitality in our systems where required under company policy, because transparency is key.
- We are especially careful to comply with veterinary and other professional rules, if they apply to us, and take time to understand those.

## By Working with Partners who share our values

- In many cases, our suppliers, contractors and other business partners are an extension of us. We only work with others who are reputable and meet our high standards of care, safety and integrity.
- We ask our key suppliers to follow IVC Evidensia's Supplier Code of Conduct.
- We work with third parties who follow employment laws and do not tolerate any form of exploitation.
- We never ask others to act unethically on our behalf, and we raise concerns immediately if a partner's integrity comes into question.

# Caring for our Patients and Clients

## By focusing on Animal Welfare

- Protecting the needs of our patients and ensuring their welfare is at the heart of what we do.
- Enhancing animal quality of life by ensuring a safe and caring environment, appropriate nutrition and medical care to meet and facilitate their needs both at home and in our care.
- Respect our patients and treat them with empathy and care, whilst ensuring that all examinations and treatments are tailored to their individualised needs.
- Encouraging responsible animal ownership through active engagement and open dialogue.

## By prioritising Animal Health

- Providing evidence-based contextualised care based on an animal's presentation.
- Regularly reviewing and improving our care systems to maximise quality, safety and the best outcomes for the patients we care for.
- Always obtaining informed consent before conducting treatments or procedures, following risk/benefit discussions with clients.
- Work actively towards disease prevention, with attention to local disease risk, and the provision of sensible preventative healthcare.

## By supporting our Clients

- Treating every client with compassion.
- Ensuring clients feel supported, informed and understood so they are empowered to make effective decisions about the care of their animal.
- Communicating clearly and transparently about care plans, potential outcomes and pricing.
- Ensuring access to care around the clock—either directly or through our trusted service providers.



# Caring for our Planet and our Communities

## By doing our bit for the Planet

- We show we care by reducing our environmental impact from our offices, clinics, hospitals, crematoriums and supply chain.
- We implement changes to move our company toward net-zero climate impact.
- We minimise our waste footprint through optimal circular economy principles.
- We are champions for responsible sourcing and select products that align with our sustainability values.
- We support our clinicians to adopt sustainable veterinary care, grounded in a One Health approach.
- We care for the planet in the same way that we care for animals- by acting with integrity.

## By always respecting Human Rights

- We respect and uphold the rights of every individual across our business.
- We care for our people through promoting safe, inclusive and healthy working conditions for everyone.
- We have a zero tolerance for modern slavery, forced labour or human trafficking and will report any concerns as soon as we are made aware.
- We only work with suppliers and partners who share our commitment to ethical and fair treatment of people.
- We take steps to identify or address risks of exploitation and abuse.

## By Giving Back

- We support charitable causes that align with our values.
- We make sure that all charitable donations are transparent, legal and in line with company policies.
- We empower our teams to positively contribute to their local communities
- We always seek advice and approval from our Group Sustainability Team before making or promoting donations on behalf of IVC Evidensia.

For more information, see IVC Evidensia's Positive Pawprint Report at [www.ivcevidensia.com/positivepawprint](http://www.ivcevidensia.com/positivepawprint)



# Keeping Information Safe

## By being careful with Data

- We are committed to protecting personal, client and company data by following data privacy laws and company policies in all of our respective jurisdictions. Safeguarding information is part of our ethical responsibility!
- We only access data needed for our work and never look at or use information without a clear reason.
- We think before sharing and make sure any data we share is done lawfully and with authorised people.
- A data breach happens when sensitive data is lost, stolen, accessed or shared without permission- whether accidental or deliberate! Examples include:
  - Sending client records to the wrong email address.
  - Losing a device.
  - Improper disposal of confidential records.
- **If a breach happens or is suspected, we must always act quickly.**
  - Report it to your manager or to our privacy team so we can provide the best support and meet any legal obligations.

## By being aware of Cyber Threats

- We protect our systems, data, and digital tools from cyber threats. Keeping our patient, client, and company information safe is vital to building trust and showing that we care.
- Cyber threats include anything that tries to access, misuse, or damage our systems. Common examples are:
  - **Phishing emails** – Messages that look real but are fake, trying to trick you into clicking a link or giving away information.
  - **Infected attachments** – Files (like invoices or documents) that contain harmful software without you knowing.
  - **Outdated apps or software** – Old or unpatched programs that make systems easier to break into.
- We reduce risk by:
  - Only using approved tools and devices.
  - Updating devices and applications when prompted.
  - Staying vigilant and thinking before we click.
  - Following cyber security Security guidelines.
- **If a cyber incident occurs—or is even suspected—we act fast and report it immediately.**

## By being Vigilant at all times

- We protect all forms of information— whether digital, paper-based, visual (like images), or verbal (such as client conversations). It's essential that we safeguard the information entrusted to us.
- We share information responsibly: Only when there is a clear and appropriate reason, both inside and outside our business.
- We prevent unauthorized access to information by:
  - Using strong passwords and keeping them confidential.
  - Locking our PCs when stepping away from our desks.
  - Securing sensitive paperwork in locked drawers.
  - Ensuring only authorized personnel have access to customer records.
- We also take care when communicating verbally by:
  - Avoiding conversations about patients or clients in public areas where they could be overheard.
- **If something goes wrong, we act quickly: If information is lost, shared incorrectly, or accessed without permission, we report it immediately.**



# Speaking Up and Raising Concerns

## How to raise a concern

If you are aware of, or you suspect, any breach of:

- any laws applicable to our company and its employees
- this Code
- company policy

Please report it by:

- Raising it with your line manager or another manager

Or

- Using our Speak Up line (you can do it anonymously if you like)

We have your trust at top of mind. We maintain confidentiality whenever possible and only share information and findings with those who have a business need to know.

When you speak up, the company will support you. Our Speak Up Policy makes it clear that we don't allow retaliation of any kind for concerns raised in good faith. Anyone who violates our Speak Up Policy and does retaliate against a team member on those grounds faces disciplinary action, up to and including termination.

Our Speak Up Line is hosted by another company and available 24/7. You will hopefully feel comfortable enough to share your name when you raise a concern because this will help us to investigate. However, there may be situations where you prefer to place an anonymous report, and you can do this through the Speak Up Line. We welcome reports from internal or external stakeholders regarding any issues relating to our business. You can file your report online or by phone.

## When someone raises a concern to you

- Let your team member know you're paying attention and care.
- Listen with empathy, they may feel nervous or upset.
- Make sure they know you've heard them, repeating the message back can help.
- Thank the team member for raising their concern.
- Respect the team member's confidentiality and only share the conversation with others as necessary.
- Decide whether you can handle the issue alone, or whether you need to involve your manager. A good rule of thumb is to get help for anything beyond any interpersonal disputes.
- Follow up with the team member and set expectations about what will happen next.

Managers and leaders bear special responsibility for following this Code and encouraging their teams to do so.



## When you raise a concern

When you raise a concern, we care. We will address it.

What that will look like depends on the specific issue at hand. But we always seek fair outcomes that respect the dignity of all involved while also demonstrating our strong commitment to the values and principles in this Code.

When appropriate, we will dig deeper and gather more facts to evaluate the concern. We will gather facts in a fair and impartial way, without making any assumptions.

Once an investigation is complete, the team in charge determines whether it is likely that the alleged conduct occurred and whether it violated this Code, any of our other policies or the law. What happens next depends on the nature of the conduct.

**Remember... it's better to speak up and seek advice than stay quiet!** If you prefer to remain anonymous that's fine, but please provide as much information as you possibly can. This really helps us to investigate and resolve your concerns.

When you use the Speak Up line, be sure to check it frequently for updates on your case.

Together we can make IVC Evidensia a kinder place and a stronger community.

**Show that you care – SPEAK UP!**

### **Final reminder**

This Code of Ethics is at the heart of our company and outlines the expectations and duties we all share. Violations of this Code may result in disciplinary action up to and including termination of employment, at the sole discretion of the Company.

### **Questions?**

Ask away! You can get in touch with our Compliance team who will be happy to assist with questions: [Compliance@ivcevidensia.com](mailto:Compliance@ivcevidensia.com)

### **Have something to report?**

See our intranet for the most up to date resources.

