

Policy Statement

IVC Evidensia operates as an international business and is subject to a range of national laws and regulations designed to prevent malpractice. As a UK based employer, all colleagues and business partners are required to adhere to the Fraud Act 2006 and the Bribery Act 2010.

Where requirements under local legislation are greater, local legislation must also be adhered to. Our Code of Conduct principle “Protecting our Reputation” and the RCVS guidelines require us to act in line with all legislative requirements.

Our Group Executive is committed to implementing effective measures to prevent, monitor and eliminate bribery and to foster a culture of integrity to support our code of conduct principle of “Respecting people and animals”. IVC Evidensia has a zero-tolerance approach towards bribery.

Scope

A criminal offence is committed under the Bribery Act 2010 if any director, colleague, consultant or any person or body acting on our behalf:

- offers, promises, or gives a bribe;
- agrees to receive or accepts a bribe; or
- bribes a foreign public official.

The Group will also commit an offence under the Bribery Act 2010 if a colleague or an associated person commits an act of bribery for the purpose of obtaining business or business advantage for the Group and we do not have adequate procedures in place to prevent this.

Where there is any evidence of malpractice within IVC Evidensia it will be dealt with in a prompt, consistent and measured manner in line with our policies.

The offences of fraud under Fraud Act 2006 are variants of deception and can be committed in one of three ways:

- by false representation (s 2);
- by failing, in breach of legal duty, to disclose information (s 3); and
- by abuse of position (s 4).

We have a legal duty to implement controls to mitigate risks. This policy applies to all colleagues, consultants, contractors and third parties providing services to, or working for, IVC Evidensia regardless of location. This policy does not form part of any contract of employment and it may be amended at any time.

Objectives

The purpose of this policy is to:

- ensure compliance with our code of conduct and the laws which regulate our workplace;
- protect the integrity of our decision-making process;
- set out IVC Evidensia's responsibilities and those of colleagues and third parties in respect of preventing Bribery, Corruption and Fraud;
- provide information and guidance to those working for, or with, the Group on how to recognise and deal with such issues; and
- provide a framework response plan for investigating and reporting instances.

Policy & Process

We have assessed the bribery and fraud risks at IVC Evidensia and have implemented actions which are proportionate. Failure to comply with this policy or to uphold its intent could potentially render both the individual and the Group liable to criminal prosecution and significant fines depending on the circumstances. It may also result in disciplinary action, up to and including termination of employment.

1. Mandatory

Colleagues or associated persons must not offer, promise, give, solicit, or accept any bribe of any kind or commit any type of fraud.

2. Due diligence

Colleagues and, where applicable, associated persons, are required to take particular care to ensure that all company records are accurately maintained in relation to any contracts or business activities, including financial invoices and all payment transactions with clients, suppliers and public officials. Due diligence must be undertaken on colleagues and associated persons prior to entering any contract, arrangement, or relationship with a potential supplier of services, agent, consultant or representative in accordance with the Group's procurement and risk management procedures.

3. Reporting

Colleagues and associated persons are required to co-operate with the Group's risk management procedures and to report suspicions of bribery or fraud to ensure that ethical standards are maintained in all our business dealings. Colleagues and associated persons are required to report any situations that may constitute bribery or fraud.

Colleagues and associated persons are encouraged to report any concerns that they may have via our [external speak-up facility](#). We will ensure that any individual is not subjected to detrimental treatment because of their report.

4. Investigation

We will investigate any alleged incident of bribery or fraud. Colleagues suspected of bribery or fraud may be suspended from their duties while the investigation is being carried out. The Group will commence investigation procedures where any colleague is suspected of bribery or fraud.

Colleagues who suspect malpractice must not do any of the following:

- Contact the suspected colleague to determine facts; or
- Discuss the case with anyone within or outside of IVC Evidensia other than General Counsel, a member of the Compliance team or the investigation manager.

5. Consequences

Disciplinary Procedure: As is the case for other matters of misconduct, matters of alleged malpractice will be dealt with appropriately. If malpractice involving a colleague is evident, appropriate disciplinary action will be taken. Our policy provides for summary dismissal in cases of gross misconduct which can include dishonesty. Such action may be considered not only against those found to have perpetrated the malpractice, but also against managers whose negligence may have facilitated it.

We may terminate the contracts of any associated persons, including consultants or other colleagues who act for, or on behalf of, IVC Evidensia who are found to have breached this policy. The Group may also report any matter to the relevant authorities, including the Financial Services Authority, the Director of Public Prosecutions, Serious Fraud Office, Revenue and Customs Prosecutions Office and the police and will provide all necessary assistance to the relevant authorities in any subsequent prosecution.

Recovery of Loss: Where IVC Evidensia has suffered loss as a result of fraud, restitution of any benefit obtained may be sought and recovery of this from the colleague(s) responsible for the fraud, may be pursued, this may include recovery from salary or through the court to the extent permitted by law.

Gifts & Hospitality

Colleagues and associated persons are required to keep accurate, detailed, and up-to-date records of all corporate hospitality, entertainment or gifts accepted or offered as per the Gifts and Hospitality process.

Facilitation Payments

The Group strictly prohibits its colleagues and associated persons from making or accepting any facilitation payments – please refer to the definition section for further clarity. Colleagues and associated persons are required to act with greater vigilance when dealing with government procedures in high risk countries.

Donations

IVC Evidensia does not make contributions to political parties in any of the countries in which we operate. The Group considers that charitable giving can form part of its wider commitment and responsibility to the community. The Company may in its discretion support several charities and may also support fundraising events involving colleagues. Any charitable donations must be approved by General Counsel.