



# Code of Ethics

DOING THE RIGHT THING



Dear Colleagues,

I strongly believe that our core values are what make IVC Evidensia a special place to work, where we enjoy what we do and work together to deliver exceptional veterinary care – these values inspire and motivate us.

### **We Care**

We care for animals and people, keep our promises, treat each other with decency and respect.



### **We Dare**

We dare to innovate, encourage entrepreneurial thinking and identify opportunities to succeed in a changing world.



### **We Share**

We share knowledge, best practice and make decisions based on trust, dialogue, commitment and engagement.

This is the basis of great teamwork. This Code of Ethics is important in driving the right behaviours that are linked to our values and set out a common framework around how we are all expected to behave and do the right thing. We should all ensure that we conduct all of our activities with honesty, integrity and according to the highest ethical and legal standards. If we come across a situation that is inconsistent with our Code, we should speak up and when in doubt or facing a dilemma, ask for help. We would like all of our colleagues to read the Code of Ethics, sign up to it and act upon it by ensuring you do the right thing.

Best regards,

Stephen Clarke  
CEO, THE GROUP

# Contents

<b>Introduction</b> .....	4
■ One Goal .....	6
<b>Respecting People &amp; Animals</b> .....	7
■ Respect .....	8
■ Breaches – Speak-Up (Whistle-Blow) .....	10
■ Health & Safety .....	12
■ Sustainability .....	14
■ Environment .....	15
■ Charity & Political Interests .....	16
■ Equality & Diversity .....	17
■ Human Rights .....	19
■ Modern Slavery .....	20
■ Procurement .....	22
<b>Safeguarding Our Reputation</b> .....	23
■ Competition Law .....	24
■ Sales, Marketing & Products .....	26
■ Conflict Of Interest .....	27
■ Anti-Money Laundering & Sanctions .....	29
■ Tax Evasion .....	30
■ Fraud .....	32
■ Bribery .....	33
■ Gifts & Hospitality .....	35
■ Travel & Expenses .....	37
<b>Protecting Our Information</b> .....	39
■ Protecting Our Information .....	40
■ ICT Acceptable Use .....	41
■ Data Protection .....	43
■ Social Media & Communications .....	45

## Introduction



Our Code of Ethics is the tool that provides guidance and expectations to support decision making that aligns with our values and ethics. The purpose of the Code is to gain the trust and respect of colleagues, clients, providers and the public in general. Our ability to continue to provide our services relies heavily on our colleagues acting with integrity.

This Code of Ethics directs our everyday work as well as policy decision processes and applies to all activities within the Group, extending beyond clinical practice. The Group refers to IVC Evidensia and our subsidiary businesses around the world.

For the Group, to be a responsible company means to behave ethically in all aspects of our business. We must set good examples in the way we act towards each other as colleagues and the way we treat our business partners and clients, always respecting laws and regulations in the countries we do business.

We expect everyone to adopt and apply the Code wherever they represent or promote our brand. The Code may set a higher standard of expectation than the law, we still expect colleagues to follow the Code and do business this way.

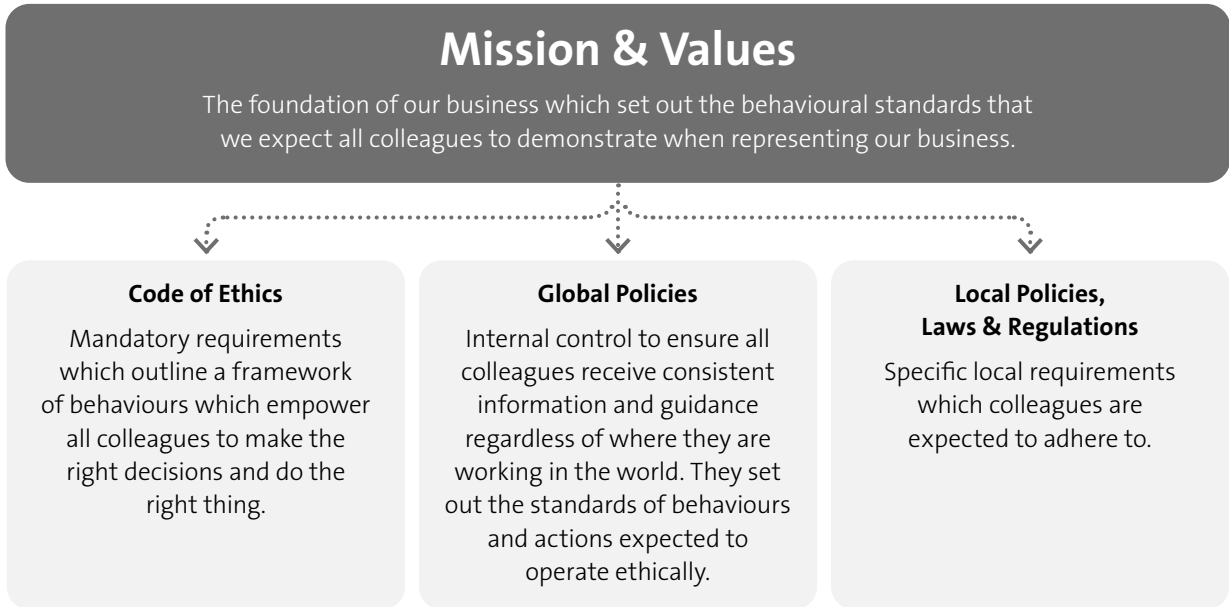
Any breach of this Code may be considered a disciplinary matter and could result in disciplinary action up to and including dismissal. It is therefore critical that all of our employees read and understand this Code. Should any retaliation or harassment occur against someone using the Code of Ethics, we will investigate and take disciplinary action where required in accordance with our HR policies and procedures.





# Introduction

Our Code complements other business processes to help support us doing the right thing.



## Vision

We are building the world's best veterinary group



# One Goal

## What should I know?

We all have a role to play in upholding our ethical values and principles. The success of the Group depends on each of us doing the right thing.

No matter what our job title is, we are all leaders when it comes to demonstrating ethics and integrity, and we must meet these important commitments.

## What should I do?

### Commitments:

- Know and follow the guidance set out in our Code
- Foster a positive, inclusive work environment and a strong culture of ethics
- Complete Compliance courses on time
- Report suspected breaches of the law or our Code
- Do not engage in workplace retaliation
- Report any known or suspected retaliation (refer to the whistleblowing section)
- Cooperate with investigations

**Leaders** – Leaders are required to be engaged and accountable and to actively promote a culture of compliance and integrity safeguarding both the business and colleagues.

**Legal & Compliance** – It is the role of Legal & Compliance to educate and empower colleagues to do the right thing, to establish clear guidelines, and to have effective procedures in place to address the complex and varied risks in our rapidly expanding business.

**Colleagues** – Colleagues must know and understand the policies and requirements and be prepared to ask questions and speak-up whenever they have concerns about actions or behaviours that may contravene this Code. All of our colleagues have a responsibility to perform their duties adhering to the recognised and documented procedures and training.

**Q** Where can I find Company policies?

**A** You can find our Policies on the Group Intranet or can request a copy of a policy from [compliance@ivcevidensia.com](mailto:compliance@ivcevidensia.com)



# 1

## Respecting People & Animals



# 1 Respect

## What should I know?

Our goal is to be the leading veterinary group in Europe with the highest standards of client and patient care and the best colleagues. Our veterinary professionals deliver exceptional veterinary care having the independence to tailor diagnostics and treatments to the needs of each individual patient and owner. This freedom is underpinned by an accountable professional culture with the evidence base, a learning

culture, inter-professional collaboration in clinically led teams, and the strongest principles of quality improvement at its heart. Through this leadership our teams work collectively to support and improve animal welfare and professional wellbeing.

The Group employs thousands of people, but ultimately we are one group with one goal.

### We commit to:

- Treating you impartially, without prejudice and never tolerating harassment or bullying in any form
- Providing you with opportunities to enhance your skills and capabilities, helping you to develop a fulfilling career and to maximise your contribution to our business
- Having formal grievance procedures that clarify what happens in the event that you have a concern that cannot be resolved satisfactorily with your manager
- Honouring your terms and conditions of employment and requiring you to do the same
- Providing fair pay, benefits and terms and conditions of employment and, where required seeking agreement for changing these when necessary for business reasons
- Remaining true to our values and ensuring these are driven across the business
- Complying with the laws and regulations of all countries in which we operate

## What should I do?

### We ask you to commit to:

- Being accountable to your line manager and report to them as appropriate
- Being open, honest, courteous and treating each other with respect and dignity
- Remaining tactful, reassuring, patient, understanding and sympathetic when working with others
- Respecting colleagues, suppliers, clients and others that you are required to come into contact with during your day-to-day work
- Demonstrating a personal and professional commitment to equality and diversity, showing respect for customs, values and beliefs that may be different from our own
- Communicating effectively and sharing knowledge, skills and expertise with other members of the team

## Do not

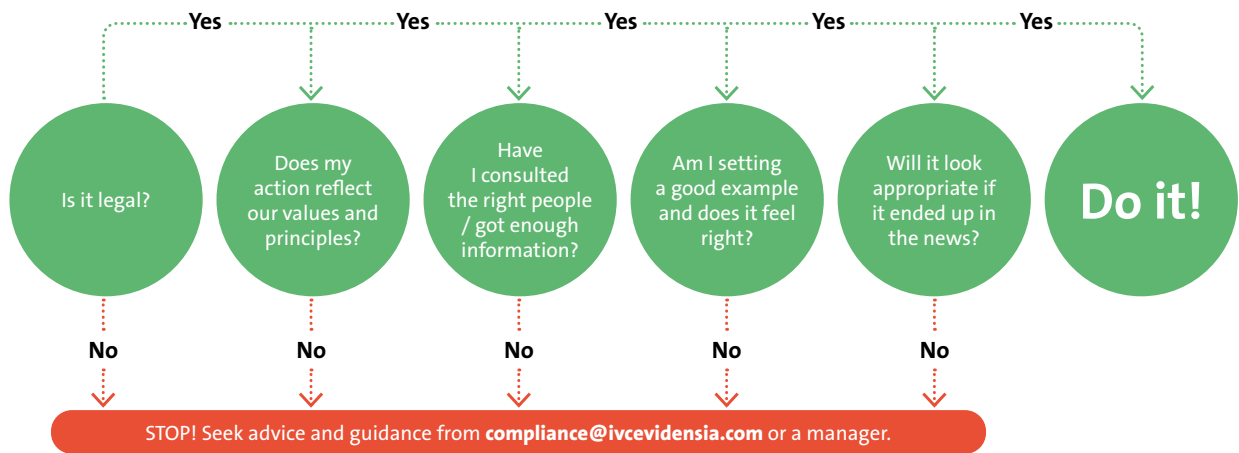
- Discuss sensitive or confidential information within earshot of others where it may be misinterpreted
- Instigate or become involved in rumour spreading or malicious gossip
- Tolerate any form of bullying or harassment

# 1 Respect

## Decision making

The Code cannot cover every situation that might arise, therefore colleagues and business partners must use sound judgement and common sense in everything they do. To assist those in difficult cases

where the “right thing” is unclear, the ethical decision tree below sets out the key questions to ask yourself, to determine whether a particular course of action is consistent with our ethical values and the Code:



# 1 Breaches – Speak-Up (Whistle-Blow)

## What should I know?

Any breach of this Code may be considered a disciplinary matter and could result in disciplinary action up to and including dismissal. It is therefore essential that all of our colleagues read and understand this Code. Should any retaliation

or harassment occur against someone using the Code of Ethics, we will investigate and take disciplinary action where required in accordance with our Human Resources policies and procedures.

### **Actions outside of these policies could have legal implications for:**

- The Group
- The colleague and their employment
- Clients, the public or other services

If you encounter a problem with a colleague, you should initially discuss the matter with them. If this is not possible, speak to your line manager or Human Resources. Where an individual has a concern about a danger or illegality that has a public interest aspect to it, for example because it threatens clients, third parties or the public generally they can whistle-blow (speak-up). Whistle-blowers are protected by law.

If you raise a genuine ethical or compliance concern, we give our assurance that you will not suffer any form of retribution or detrimental treatment. We will treat your concern seriously and act according to our policy. If your concern relates to working environment or conditions, how you are treated or managed, terms

and conditions of employment, personal impacts resulting from organisational or business changes then you should contact the Human Resources team.

Once a report is received it will be reviewed by the Compliance Team to ensure it fits the whistle-blowing criteria. You will receive a confirmation of receipt and an Investigation Manager will be appointed. We aim to complete initial stage investigations within 28 working days of the concern being reported, although depending on the scale of the issue this may not always be possible. The reporter will be notified that the concern has been dealt with but will not share the outcome due to data privacy.

## What should I do?

There are a number of different ways in which you can report a compliance concern:





# 1 Breaches – Speak-Up (Whistle-Blow)

**Q** I saw my Line Manager doing something that seemed wrong, but I am afraid to report it. Will I get into trouble or harm their reputation by making a report?

**A** No. You cannot get in trouble or harm your Line Manager's reputation simply by making a report. You cannot be held responsible for reports made honestly, even if they turn out to be unfounded as long as they are not made maliciously. Investigations are conducted in an objective, fair and confidential way to ensure that colleagues' reputations are protected. All concerns about the Code and reports of retaliation will be fully investigated.

**Q** What if I want to report a concern anonymously?

**A** We encourage all colleagues to give their name when reporting concerns, as this enables us to investigate and deal with the concern quickly and appropriately, and to contact you if we need to during the course of the investigation however if you have a genuine fear of reprisal then the independent speak-up option enables this.



# 1

## Health & Safety

### What should I know?

The Group places a high priority on providing a safe working environment and will act positively to minimise the incidence of all workplace risks as required by health and safety legislation. We monitor and measure health and safety performance to help us determine how we can improve.

All activities will be carried out with the highest regard for the health and safety of colleagues, clients and other third parties. Our aim is excellence in health and safety, by means of continuous improvement of standards, and the comprehensive use of risk assessments to manage and reduce the causes of accidents/incidents and ill-health.

This, together with more specific aims and objectives, reflects our commitment to promote colleague wellbeing. Every colleague has a legal duty to look after their own health, safety and welfare and that of those around them.

Certain areas, or roles within the business may require to be a member of a professional body or have a certification to operate. Colleagues are responsible for maintaining the licenses and reporting immediately any changes, revocations or lapses in the validity of such licenses.

Violence and aggression in the workplace (physical and verbal) is increasing globally. Common incidents in veterinary care could include verbal or physical abuse by clients or indeed colleagues. We will treat all incidents of violence and aggression seriously and will investigate them promptly and efficiently. Any form of aggression or violence in the workplace is not acceptable.

### What should I do?

- Be aware of the work being undertaken and the hazards associated with it
- Follow the safe working procedures provided
- Look out for your own safety and that of others around you
- Report any accident, near miss, injury, ill health or unsafe condition so that appropriate action can be taken
- Ensure you are properly trained for the work you are doing
- Report any instances of violence or aggression

### Do not

- Condone any unsafe act, condition or behaviours
- Walk by any unsafe act or work area without raising the issue
- Ignore the training we have been provided with
- Apply pressure to our colleagues to work in an unsafe manner or unsafe hours
- Work whilst under the influence of alcohol or drugs

# 1

## Health & Safety

**Q** My Line Manager suggested using an unsafe practice to speed up the task I was doing. I know our goals are very important, but I do not feel the new process is safe. What should I do?

**A** Report it. Never compromise safety. Every colleague has the right to refuse to do work reasonably perceived to be dangerous to personal health & safety. Report any health & safety concerns to the Health & Safety Manager.

**Q** I overheard a co-worker threaten another colleague, who is afraid to report the incident. What should I do?

**A** Report the incident immediately. We will not tolerate acts of threats or violence and will investigate all reports. You have a responsibility to act when you know of a threat or risk to any other people.

**Q** One of the nurses was bitten by a cat today, where do we have to record accidents?

**A** All accidents should be recorded on our central database.



# 1

## Sustainability

### What should I know?

As part of The Group's vision of building the world's best veterinary group we are committed to building a more strategic approach to sustainability through our Positive Pawprint initiative which sets out our commitments across three areas where we believe we can make the most difference: People, Planet and Pets.

In doing so, we endeavour to being a force for good for our colleagues, our clients, their pets, and the natural world in which we all live. This strategy drives how we interact with all those we do business with, including our investors, business partners, suppliers and local communities.

### What should I do?

- Attend any training provided on applied sustainability in our industry
- Evolve industry-leading sustainable procurement practices



#### Find out more

[Click here for the Positive Pawprint Strategy](#)

# 1

## Environment

### What should I know?

As part of our 'Planet' pillar the Group recognises that we have a legal, moral and ethical responsibility to reduce our environmental impact and improve our environmental performance as an integral part of our business strategy and operating methods. We encourage all colleagues, clients and suppliers to do the same and where possible implement sustainable practices.

We are working to increase efficiency across our operations: producing less waste, recycling more, reducing the energy we use in our clinics, making sure we manage medicines appropriately and working in partnership with our suppliers to deliver shared environmental objectives.

### What should I do?

- Incorporate environmental factors into business decisions and processes
- Increase colleague awareness by encouraging recycling, reuse and thinking of the impact waste has, not just locally
- Minimise noise disturbance to neighbours
- Practice leading standards of chemical and pharma management
- Switch off lights and equipment when they aren't in use

**Q** I have seen activities at work that may compromise the environment or create an environmental hazard. What should I do?

**A** Report it to a manager or through the whistle-blowing facility. If you are aware of any potential violation of law or company policies or procedures, it is your responsibility to report it. The incident or condition will be investigated and if necessary corrected.



#### Find out more

Click here for the Environmental Policy



# 1

## Charity & Political Interests

### What should I know?

The Group believes that it is important to support charitable causes. Local Human Resources departments can advise on the process. We support a range of charitable causes and ensure all contributions are transparent and in accordance with legislation. We do not work with political bodies or military or religious charities. Where we do seek to influence

policy development, we do so transparently through our support for, and work with, expert or like-minded organisations with which we have shared values. We are committed to engaging with relevant non-governmental organisations and recognise their potential to improve animal wellbeing.

### What should I do?

- Notify managers of any charities that you would like to support to establish whether it is possible
- Ensure all contributions are transparent and in accordance with legislation and policy



### Do not

- Use work resources or time to support a charity without permission from a manager
- Make a donation on behalf of the Group without approval
- Donate to, or participate in, any political causes on behalf of the Group



**Q** One of my friends is running for local council elections and has asked if I can support her. Can I put up posters around work?

**A** Posters cannot be displayed. Any support should be in your own time and made clear that it is your endorsement and not that of the Group.

**Q** I have spent years working to represent my local community and I'm running in a local election – will the Group donate to support my campaign?

**A** No, this would be donating to a political donation. Supporting a colleague in a local election could be perceived as the Group supporting one party over others.

**Q** We work closely with a local animal rescue charity which is in need of funding, can the Group help?

**A** Grants to local charities are available via our Local Community Grants Fund. Speak to your manager to discuss nominating this charity for a grant.



# 1 Equality & Diversity

## What should I know?

Respect in the workplace, along with teamwork, is how we will accomplish our goals. Our commitment is to a fair and responsible workplace that is free of discrimination, inequality or harassment. We will not tolerate any form of personal abuse, bullying, harassment or mistreatment of colleagues, clients or suppliers. As colleagues we must always treat everyone with dignity and respect.

We promote equal opportunities, and respect and acknowledge the diversity of colleagues who work within the Group as well as the clients and other stakeholders that are part of the wider community we work with.

Equality and diversity are essential factors that contribute to the strength and continued growth of any business. The Group is focused on recognising the achievements and value of every individual and therefore aims to create an environment in which all are valued, where talents are fully utilised and organisational goals are achieved through the principle of inclusivity.

Most countries have legislation that require equality of characteristics including age, disability, gender, race, religion or belief, sexual orientation, gender reassignment, pregnancy and maternity. Colleagues can be held personally liable for any act of unlawful discrimination or harassment. Colleagues who commit serious acts of harassment may also be guilty of a criminal offence. All allegations and reports of discrimination or harassment will be dealt with seriously, confidentially and promptly.

If you wish to make a complaint of discrimination you should contact Human Resources. In the unlikely event that you have already reported it in this way and the matter has not been dealt with then you can report through the whistle-blowing facility.

## What should I do?

- Consider equal opportunities at all stages of recruitment, selection and promotion ✓
- Ensure advertisements aim to encourage applications from all suitably qualified people
- Avoid setting any unnecessary provisions or criteria which would exclude a particular protected characteristic
- Provide training to all colleagues to help them understand their rights and responsibilities in relation to equal opportunities and dignity at work
- Create a work environment that is free from discrimination, bullying and harassment
- Make reasonable adjustments to work provisions where a risk assessment has identified this as a need

## Do not

- Fail to take action against any third parties who are found to have committed an act of improper or unlawful harassment ✗
- Refuse to work with any client or third party based upon any of the prohibited ground
- Refuse to take steps to meet the different needs of particular clients arising from our obligations under anti-discrimination legislation
- Fail to provide reasonable services which meet the specific needs and requests arising from a protected characteristic

# 1 Equality & Diversity

**Q** I recently applied for a promotion but was declined and I think it is because I am pregnant, what should I do?

**A** Discuss the matter with the interviewer to understand the reasons for their decision, if you do not feel that you can do this then contact Human Resources to discuss your concerns.

**Q** I overheard a colleague tell my co-worker a joke involving religion that made them uncomfortable. I don't want to get in the middle of it. What should I do?

**A** Report it. All colleagues are entitled to a workplace where their colleagues treat them with dignity and respect. You should report the matter to your Line Manager or contact Human Resources, even though doing so may make you feel uncomfortable.

**Q** One of my team members was making several flirtatious remarks to a client. I thought this was a personal issue and did not say anything. Am I right?

**A** No. If you tolerate your team member's inappropriate behaviour, you are giving the message it is acceptable. You should coach the team member on appropriate behaviour.

**Q** Whenever I am alone with my manager, they make unwelcome advances towards me. What should I do?

**A** Any unwelcome advances are never acceptable. If you are comfortable doing so, professionally and respectfully address the situation with the manager. If not, then speak to Human Resources or report it through our speak-up (whistle-blowing facility).

# 1 Human Rights

## What should I know?

The [UN Guiding Principles on Business and Human Rights \(UNGPs\)](#), which were adopted by the United Nations in 2011, set out the principle that businesses have a responsibility to respect human rights. This responsibility is considered to be a global standard of the conduct to be expected from all organisations wherever they operate and is separate to any voluntary initiatives that we may participate in, such as the UN Global Compact or the OECD Guidelines.

We operate in an increasingly international business environment with complex supply chains and our operations can have an impact, good or bad, on human rights. We are committed to respecting the human rights and dignity of individuals. Our support of internationally recognised Human Rights is consistent with our dedication to enriching our workplace, partnering with our supply chain, preserving the environment and supporting the communities where we operate.

Human Rights are covered in various sections within the Code, those below are some which are not identified in other areas.

## What should I do?

- Ensure that where national laws differ from international human rights standards or our own policies and procedures we will, so far as possible, follow the higher standard
- Respect the rights of individuals belonging to groups or populations which may be particularly vulnerable to adverse impacts, including: indigenous people; women; national or ethnic, religious and linguistic minorities; children; homeless; and migrant workers and their families
- Expect our colleagues and suppliers to respect workers' rights, in line with the International Labour Organisation [ILO Declaration on Fundamental Principles and Rights at Work](#)
- Recruit ethically and prohibit practices that impede the possession of or unrestricted access to personal identification documents
- Provide fair wages and benefits and abide by all laws and regulations regarding pay practices and the classification of employment according to job level and status
- Promote respect for human rights within our spheres of influence through stakeholder engagement, collaboration, and participation in various forums
- Recognise our responsibility to respect human rights and avoid complicity in human rights abuses



# 1 Modern Slavery

## What should I know?

Modern slavery is defined as the recruitment, movement, harbouring or receiving of children, women or men through the use of force, coercion, abuse of vulnerability, deception or other means for the purpose of exploitation. It is a crime and a violation of fundamental human rights. It takes various forms, from servitude to human trafficking, and is essentially the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. We have a zero-tolerance approach

to modern slavery and are committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chain. We expect the same high standards from all of our contractors, suppliers and other business partners.

The prevention, detection and reporting of modern slavery in any part of our business or supply chain is the responsibility of everyone at the Group.

## What should I do?

- Conduct assessments of the risk of modern slavery and human trafficking, both for our own business activities and those of our suppliers
- Make contractual agreements with our suppliers that require them to respect internationally recognised human rights in their work
- Work with business partners who share our commitments to safety, ethics and compliance
- Take appropriate measures where they do not meet those expectations or obligations
- Stay alert for any behaviour that might suggest modern slavery

### **International Labour Organisation indicators of modern slavery include:**

- Abuse of vulnerability
- Retention of identity documents e.g. passport, ID or travel documents
- Always allowing others to speak for them or talking as though being instructed or coached
- Appear withdrawn or frightened and may have injuries
- Limited social interaction, unable to contact friends or family freely
- Restriction of movement, always dropped off or collected from work
- Having very few possessions
- Living in a very poorly maintained, overcrowded place
- Withholding of wages/ little control over finances
- Excessive overtime

The presence of a single indicator in a given situation may in some cases imply the existence of forced labour. However, in other cases you may need to look for several indicators which, taken together, point to a forced labour case.

# 1

## Modern Slavery

**Q** I did an out of hours visit at a farm recently to treat some cows and noticed there seemed to be a lot of people speaking in a foreign language outside a large dilapidated barn in the grounds, I think they seem to be living there, what should I do?

**A** This could be a modern slavery issue. Contact [compliance@ivcevidensia.com](mailto:compliance@ivcevidensia.com) for advice or if you believe that someone is in immediate danger then contact the police.

**Q** I have concerns that one of our employment agencies may be requiring workers to lodge financial deposits and identity papers in order to secure employment, then withholding them when the worker wishes to leave. What should I do?

**A** This is a potential case of forced labour or modern slavery and you should raise these concerns directly to Human Resources.

**Q** We have taken on three new colleagues over the last few months and I have noticed they all share the same address and bank account. What should I do?

**A** This is a potential case of forced labour or modern slavery and you should raise these concerns directly to Human Resources.

**Q** I saw a post on social media about one of our suppliers. It suggested that they may have been involved in unfair labour practices. Since it doesn't involve us, do I need to do anything?

**A** Yes we hold our suppliers accountable to our high standards and if there is even a hint of impropriety it should be reported to [compliance@ivcevidensia.com](mailto:compliance@ivcevidensia.com)



### Find out more

Click here for the  
Human Rights Policy

# 1

## Procurement

### What should I know?

Our procurement practices should be consistent with our values and this Code. We require our business partners to abide by this Code as well as all applicable laws and regulations, including those regarding human rights, workplace safety and worker compensation and treatment. We make decisions on the selection of our business partners, including suppliers, franchise partners, wholesale partners and

others based on the principles of this Code and other objective criteria, not on personal relationships or opportunities for personal gain. Procurement should be engaged at the beginning of any process where goods or services required are above the permitted level. We reference the United Nations Sustainable Development Goals in our Positive Pawprint Strategy.

### What should I do?

- Ensure that our purchases, suppliers and operations are consistent with our goals, in areas such as packaging, resource usage, carbon footprint and supplier working conditions
- Low spend goods and services should be bought via Company Credit Cards
- Ensure all suppliers complete our Supplier Assessment and sign up to our Supplier Code of Conduct
- Use our standard contracts to document the terms and conditions with any Supplier
- Ensure signatures of contracts and financial approval of suppliers during the selection process must be in line with the Group Levels of Authority policy

**Q** I need to agree a five year exclusivity contract, what approvals do I need?

**A** This is a significant contract, Procurement must be engaged at the start to understand the business case and can liaise with Legal regarding the possibility of exclusivity and relevant levels of authority.

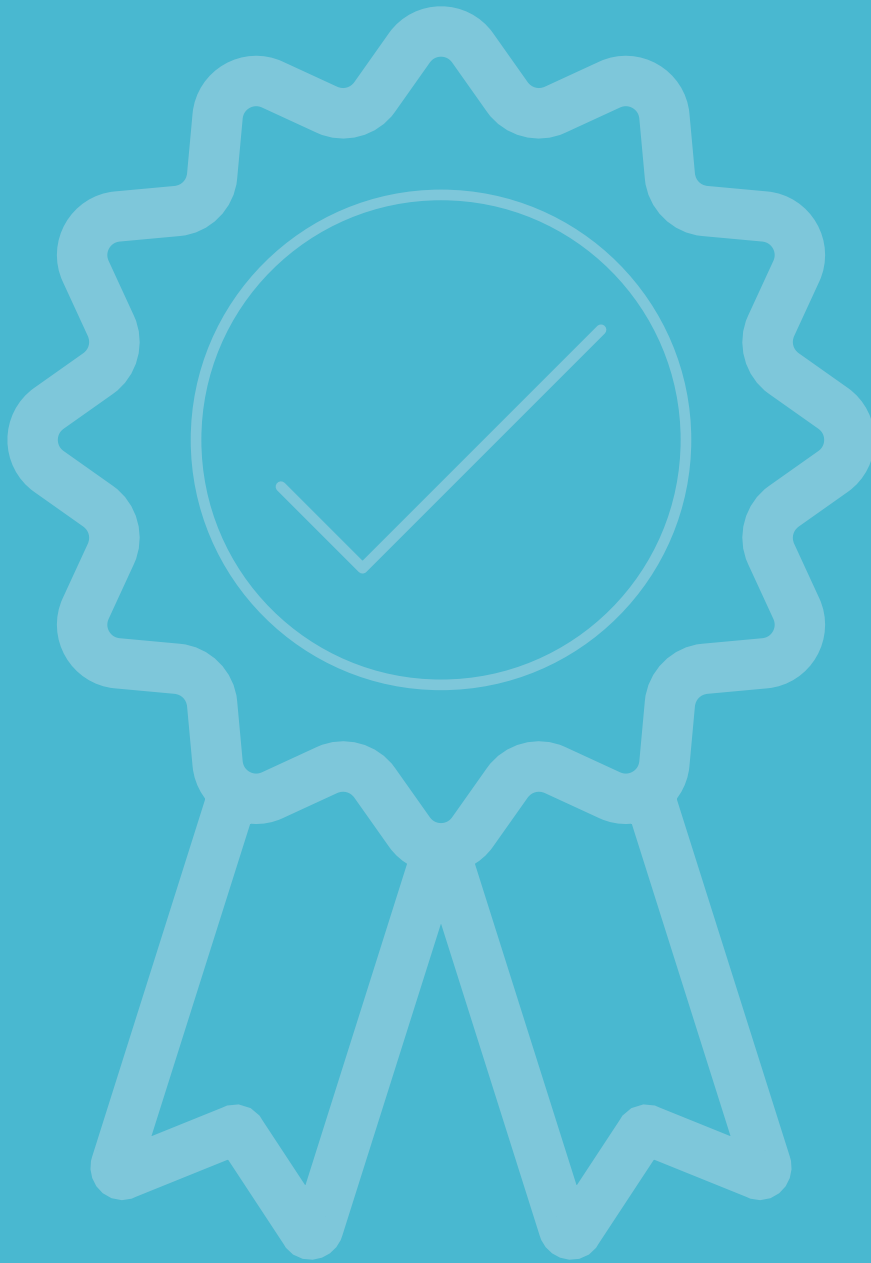
**Q** I have been offered an incentive in return for awarding a contract to one of the companies that have submitted a tender, they look like the best option so it seems like a win win situation don't you think?

**A** No, the fact that they are offering a bribe suggests that they would not be someone we would want to partner with as we could not trust them to do business ethically on our behalf. We should decline and remove them from the tender process.



# 2

## Safeguarding Our Reputation



# 2 Competition Law

## What should I know?

The Group believes in vigorous yet fair competition. The Group companies and our clinics and practices comply with all applicable competition laws and regulations.

The Group is proud of the services and standards we offer. We compete fairly and make our own independent commercial decisions. We will not enter into anti-competitive agreements that seek to restrict markets or fix prices.

The Group respects the confidential commercial information (information about another company or business which has commercial value and is not in the public domain) of third parties, including competitors and suppliers. Accepting or using competitors' confidential commercial information risks a serious breach of competition laws with serious penalties for the Group and individuals.

## What should I do?

- Ensure any engagement in a professional body or group is competition law compliant ✓
- Do not share or discuss any commercial information or intention
- Ensure that any professional bodies or groups in which you participate have a clear policy of competition law compliance
- Only gather competitor information from the public domain through reputable sources
- Ensure commercial information is from a legitimate source, and document the source
- Avoid contact with competitors that could create the appearance of improper agreements or understandings
- Disassociate yourself from any situations where improper agreements or information sharing is raised

## Do not

- Seek to obtain competitor confidential information from new colleagues or suppliers or other third parties ✗
- Discuss pricing, pricing strategies, costs, margin, product planning, marketing or terms of sales with competitors
- Link purchase of one product to another product or service
- Dishonestly represent the products or services of a competitor or induce clients to break contracts with competitors unlawfully
- Use industry groups as a forum for discussing or agreeing a common approach to a customer or commercial issue such as promotions

**Q** I've received some commercially sensitive information from a competitor, what should I do?

**A** Speak to Group Legal who will provide you with a rejection statement to send back. Delete the email and do not share it with anyone.

## 2 Competition Law

**Q** One of our suppliers has asked us to use a specific fixed price for their product to align a promotion across different groups, is this ok?

**A** No – It could constitute Retail Price Maintenance which is illegal. We can agree to shared promotional activity but suppliers or manufacturers cannot determine our resale price, fix margins or pressurise us to deter discounting.

**Q** I attended an industry conference and had lunch with a friend from university who now works for a competitor. He began discussing his company's pricing strategy and asked about ours. Was this appropriate?

**A** No – always put an immediate stop to such conversations and report it to Legal as this could be viewed as an attempt to price fix which is illegal.





# 2

## Sales, Marketing & Products

### What should I know?

We are committed to honest, transparent and accurate communications with clients, whether in advertising, product information or more detailed reporting. We aim to maintain the quality of our products and services, and recognise that clients consider quality, reliability, safety, value for money as key factors when assessing our reputation and placing their trust in us. We market our products responsibly

and are committed to promoting positive images in our advertising. We are committed to maintaining high standards of service, proactively dealing with issues and complaints if things go wrong. We respond appropriately to enquiries from clients and other interested parties. We encourage and welcome feedback on our products, performance and services, and take this on board to improve our service.

### What should I do?

- Ensure any incentives or competitions are assessed by our Legal department to ensure compliant with legislation
- Ensure all pricing is in line with local legislative requirements
- Identify and protect our Intellectual Property through patents, trademarks, copyrights or trade secrets



# 2 Conflict Of Interest

## What should I know?

A conflict of interest arises where a colleague's position or responsibility presents an opportunity for personal gain above the normal rewards of employment.

They can also arise where personal interests are in conflict with those of the Group or create conflicting loyalties in respect of transactions between the Group and a third party. You must not be involved with an activity for personal gain which is in conflict with the Group's business interests. Any of your personal interests or the interests of a member of your immediate family in relation to the Group's business must be disclosed to your manager immediately.

You must not work simultaneously for any of the Group's competitors or suppliers. If you are unsure as to whether a conflict of interest exists, please speak to your manager or email [compliance@ivcevidensia.com](mailto:compliance@ivcevidensia.com). All decisions must be made with the best interests of the Group in mind. You must never allow external influences, particularly friends, family or any financial or political interests, to affect your decision. In some countries we have a legal obligation to identify, manage and disclose conflicts of interest.

## What should I do?

- Avoid a situation where our personal interests or those of our family and friends, may influence a business decision ✓
- Declare any interest you have in other organisations (commercial, charitable or political) to your line manager and register them when you start and as part of the annual disclosure
- Obtain appropriate written approval for accepting any board position outside of The Group
- Implement processes that ensure satisfactory management of the situation and reduce the risks
- Use the decision matrix on the next page to help determine whether you have a conflict

## Do not

- Employ, attempt to employ, or have other business dealings with a family relative unless the Human Resources team has approved it ✗
- Make an investment in a client or supplier if we have direct commercial involvement with them
- Conceal any conflict (or perceived conflict) of interest
- Use confidential information about our business or its affairs in a way that benefits you or a family member

**Q** My brother owns a company that provides clinical services. He wants to provide a service to the Group. Is he allowed to perform services for our practice?

**A** It depends. Your brother may approach the practice to offer his services as long as you have no responsibility in procuring these services, and you have no involvement in the selection process. His company will need to go through the established selection process and meet the practice criteria. You should tell your Line Manager about such situations.

# 2 Conflict Of Interest

**Q** I am part of a team assessing candidates for a new role. One of the shortlisted candidates is a family member, what should I do?

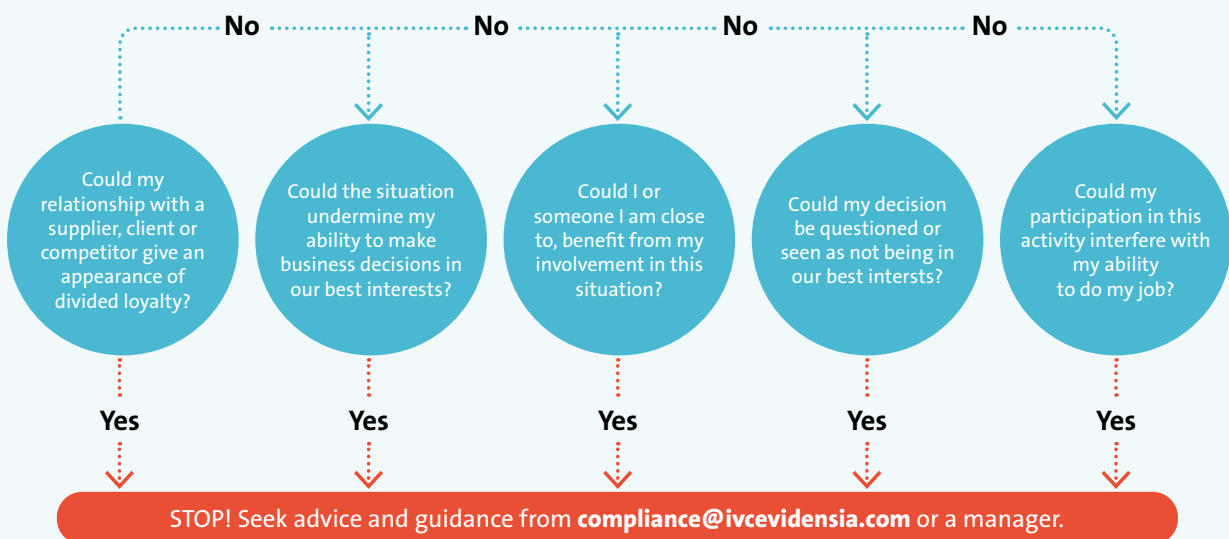
**A** Make your manager aware and withdraw from the assessment process. You should not discuss the details or process with the family member.

**Q** I have been asked by a pet food brand to endorse one of their products, can I do this?

**A** Before we can advise, we need to understand in more details, you will be required to complete a conflict of interest form and Legal and Compliance will review and advise accordingly.

### Conflict of Interest Decision Matrix

If you answer yes to any of these questions then you must disclose the potential conflict of interest.





# 2 Anti-Money Laundering & Sanctions

## What should I know?

The UK Anti-Money Laundering Directive has global scope and applies in all of the countries in which we operate. Money laundering is an offence. It is the process or act of disguising or hiding the original ownership of money that has been obtained through criminal acts and moving it through legitimate businesses and sources to make it appear 'clean'.

We will not do business with any country or business subject to economic sanctions. Economic sanctions

are commercial and financial penalties applied by one or more countries against a targeted self-governing state, group, or individual. Economic sanctions are not necessarily imposed because of economic circumstances—they may also be imposed for a variety of political, military, and social issues. We have a legal responsibility to conduct adequate due diligence on new vendors and suppliers to ensure that there are no money laundering or sanctions alerts relating to their business.

## What should I do?

- Reduce the number of suppliers and vendors we are working with
- Work with preferred supplier lists
- Ensure new suppliers complete the Supplier Assessment and sign up to the Supplier Code of Conduct
- Monitor substantial overpayments or duplicate payments by suppliers, who subsequently requests large refunds
- Query suppliers incorporated in a different location from the main place of operations or tax residence

## Do not

- Accept the receipt of any cash payments or anonymous wire transfers from suppliers
- Signup new suppliers who are reluctant to provide business or personal information
- Accept request to overpay or pay a different currency to that on the invoice
- Accept requests to receive or pay funds into an offshore account or bank account in a different country from where their business is conducted
- Accept requests to receive or pay monies to, or from, different bank accounts or through a different third party
- Accept or provide invoices in an editable format

**Q** We have used a company once but they have given bank details which are not their own. What should I do?

**A** Go back and request that they provide their own bank details as we cannot pay into a bank account that does not belong to them.

**Q** We have a new supplier who we are spending a lot of money with but they have asked if we can pay the invoices in smaller chunks on a weekly basis. We are still paying the same overall so is that ok?

**A** No, they could be asking you to pay in this way to keep it below the threshold for money laundering checks. State that we have standard payment terms and have to follow these.

## What should I know?

The UK Criminal Finances Act 2017 consists of 2 key corporate offences, the failure to prevent facilitation of UK tax evasion and the failure to prevent facilitation of foreign tax evasion. This legislation has global scope and applies in all of the countries in which we operate. Tax evasion is the illegal practice of not paying taxes. Facilitation is deliberately helping another individual or business evade the payment of tax regardless of location.

We will take all reasonable steps to prevent the facilitation of tax evasion and are committed to implementing and enforcing effective systems to counter tax evasion facilitation. We have a zero-tolerance approach to tax evasion. Criminal prosecution of the business, unlimited financial penalties and reputational damage to the business can result if we fail to comply with this legislation (and individuals can be prosecuted for tax fraud or facilitating tax fraud under pre-existing criminal legislation).

## What should I do?

- Expect businesses and people that we engage with to comply with their own tax obligations and correctly account for all taxes that they may owe
- Do not tolerate anyone knowingly assisting or encouraging tax fraud of any sort
- Support the questioning and eventual declining of business where there are any suspicions of tax evasion or the facilitation of tax evasion
- Identify and take steps to prevent any scenarios where there may be a risk that they are facilitating others to commit tax evasion

## Do not

- Work with any third party (including those who contract with us or otherwise provide services to us) who do not have a similar commitment of zero tolerance to tax evasion
- Engage in any activity which evades tax or facilitates or may facilitate the evasion of tax by any other person (company or individual)
- Engage with any third party who does not have a similar approach



## 2 Tax Evasion

**Q** One of our distributors has requested they be paid via a bank account in a country different to that which they are based in, and we operate in. What should I do?

**A** Report this. This is a red flag and we will require more information to determine what actions are required. Do not proceed, or authorise, without doing this.

**Q** Ulrika, a colleague from Sweden has been working in the UK for an extended time. She has asked Ben in Human Resources to shorten her recorded time in the UK to ensure she does not trigger a liability to UK income tax, is this ok?

**A** No! It does not matter that she is a Swedish colleague. She is still an associated person, as is Ben. This would be classed as tax evasion and we should have reasonable procedures in place to prevent this.

**Q** Dan our Clinical Director wants to delay buying a new scanning machine by a month to take advantage of new tax rules in 2022, reducing our corporate tax liability. Is this ok?

**A** Yes. This is an example of legitimate tax mitigation, which is the legal usage of the tax regime to our benefit.

**Q** We outsource sales services to another company. Unbeknown to us, a colleague of theirs has been facilitating tax evasion by not including VAT on invoices to our clients, surely this can't be our fault?

**A** We could be prosecuted if we cannot demonstrate we have reasonable procedures in place. Turning a blind eye may constitute a deliberate and dishonest facilitation of tax evasion because it implies knowledge and deliberate and dishonest inaction.



### Find out more

Click here for the  
Tax Evasion Policy

# 2 Fraud

## What should I know?

Fraud is the act of deliberately deceiving for personal gain or to cause loss to another party. Acts of fraud include falsifying records, documents and reports; failing to disclose information, or abuse of position. Fraud is a threat to the financial well-being of an organisations image and reputation. The UK Fraud Act 2006 has global scope and applies in all of the countries in which we operate. Where requirements

under local legislation are greater, local legislation must also be adhered to. The offences can be committed through false representation, breach of legal duty or abuse of position.

Fraud may be motivated by the opportunity to gain something of value (such as meeting a performance goal or obtaining a payment) or to avoid negative consequences (such as discipline).

## What should I do?

- Avoid practices that could give the appearance of fraud e.g. never spend company funds or enter into an agreement unless authorised to do so
- Be aware of the red flag guidelines within the Bribery & Fraud Policy
- Ensure any amendments to patient records are transparent, accurate and traceable



## Do not

- Amend patient records
- Place inaccurate notes on patient records
- Alter figures or patient notes to meet targets or achieve bonuses
- Falsely report time worked to earn more pay or to avoid discipline for being late or absent from work
- Falsify insurance or expense claims



**Q** Over the weekend, I accidentally used my company credit card to put fuel in my personal vehicle. Am I going to get in trouble?

**A** Not if you declare it. We all make mistakes. Just make sure you indicate this in your next expense claim and request for it to be deducted from your salary. However, if this is a habitual problem, there may be disciplinary actions.

**Q** Our discount policy allows us discount for up to 3 pets but I only have 2 so have been putting through my mother in law's dog for discount as though it is mine, is this ok?

**A** No, the policy applies only to your pets and this would count as fraud as you are falsely declaring it as your pet and depriving the Group of revenue.

**Q** I have just noticed that one of our team has made an insurance claim for treatment that was not carried out on their own pet. What should I do?

**A** This may be fraud, if you feel you can raise this to the Clinical Director or Practice Manager then you should do so, if not you can use our Speak-Up facility.

# 2

## Bribery

### What should I know?

We expect all of our colleagues to comply with all legislation regarding bribery and corruption and expect our suppliers to operate in the same manner. We are committed to complying with the UK Bribery Act 2010 as it has global scope and applies in all countries where we have business activities.

A criminal offence will be committed if a colleague or associated person offers, promises or gives a bribe; requests, agrees to receive or accepts a bribe; or bribes a foreign public official.

Colleagues or associated persons should not offer, promise, give, solicit or accept a bribe of any kind. This prohibition applies whether the bribe takes the form of cash, a gift or other inducement such as hospitality to, or from, any person or company, whether a public or government official, official of a state-controlled industry, political party or a private person or company, and regardless of where the colleague or associated person is in the world.

### What should I do?

- Refuse to make or receive any bribes, facilitation or other payments which are not included within our contract
- Be aware when dealing with countries known for high corruption ratings
- Ensure invoices are specific about services provided
- Ensure we have a contract for all goods or services
- Report suspicions of bribery to your Line Manager or [compliance@ivcevidensia.com](mailto:compliance@ivcevidensia.com)



### Do not

- Request favours for a family member in return for goods or service
- Request advantageous terms in response for goods or services
- Pay commission fees before entering into an agreement
- Pay cash payments or payment in a different currency for a supplier
- Make payments to a suppliers personal account, split into smaller payments or more than one bank account





# 2

## Bribery

**Q** I'm travelling on business and have been stopped by passport control at the destination airport. They've told me that my documentation is incomplete and are demanding that I pay them a sum equivalent to £5 to be allowed entry to the country. They are quite intimidating - what should I do?

**A** Your safety is our priority - if you feel that there is a threat to your personal safety you should make the payment. It could be classed as a facilitation payment, which we do not condone and is an offence under the Bribery Act. You should report the payment to your manager and [compliance@ivcevidensia.com](mailto:compliance@ivcevidensia.com) as soon as possible and ensure that it is recorded.

**Q** A client recently offered me a bonus on top of normal veterinary fees if I provide the vaccination and health cards for some puppies that he is breeding but they are not in good health and I am not happy with doing as he asks, what can I do?

**A** Accepting would be both criminal and ethically wrong. Advise that you are not able to do so and report it as an animal welfare issue.



### Find out more

Click here for the Bribery, Corruption & Fraud Policy



## What should I know?

Gifts and hospitality are classed as risks within the Bribery Act. The acceptance of gifts, services and hospitality could leave us vulnerable to accusations of unfairness, partiality or deceit, or even bribery if we do not have clear processes as to what is and is not acceptable. Commercial relationships could also be subject to bias and our reputation for 'doing business ethically' could be put at risk if we do not operate within our stated processes.

**Gifts** – physical objects offered to, or received from, a third party.

**Hospitality** – travel, accommodation, food, drink, entertainment, a cultural or sporting event (participating or spectating) or anything similar which is offered to, or received from, a third party.

The Group permits reasonable and proportional corporate entertainment, gifts, hospitality and promotional expenditure that is undertaken to improve the image and reputation of the Group, present our products and services effectively or for the purpose of establishing or maintaining good business relationships.

Everyone at The Group has a passion for animals and animal wellbeing. We know that our commitment to care is appreciated by clients, who may want to show appreciation by a small gift. Small tokens of appreciation are well deserved by our teams and we do not consider them inappropriate.

It may also be appropriate for colleagues to accept gifts from suppliers or any other person or organisation with whom we have, or may have, business connections but there are also circumstances where it would be unacceptable.

## What should I do?

- Only give or receive gifts and hospitality which adhere to policy and are approved ✓
- Ensure that you register any gifts and hospitality received with a value of more than £10
- Ensure that you record any gifts and hospitality given through the expense system
- Ensure that gifts and hospitality are appropriate and proportionate
- Record any gifts or hospitality DECLINED on the register too

## Do not accept or give

- Cash, gift vouchers or gift cards ✗
- Gifts worth more than £50 without approval
- Gifts or hospitality with no clear purpose or objective
- Gifts or hospitality during a tendering or selection process
- Gifts or hospitality from public officials
- Business entertainment where there is an attempt to influence/ gain advantage

**Q** A supplier who would like to work with my practice takes me to lunch at least twice a month. Is that okay?

**A** It depends. Accepting lunch invitations is okay if you are meeting for a business purpose, but frequent offerings such as this or acceptance of extravagant meals can appear to create a conflict of interest or an inappropriate relationship.

# 2 Gifts & Hospitality

**Q** A client offered to provide me a weekend in London because they are happy with the care I give their animal. What should I do?

**A** This would be considered excessive, politely refuse, and advise that it is against company policy.

**Q** I have received a voucher from a client, what should I do?

**A** Politely decline stating that it would be a breach of company policy as cash equivalents are not permitted. When you decline an item it should also be registered.

### Gifts & Hospitality Decision Matrix

If you are unsure refer to the decision tree below. If you answer yes to any of these questions then you must not give or receive the gift or hospitality.



## What should I know?

Business expenses may be incurred using personal funds that are reclaimed via payroll on a monthly basis (out of pocket expenses), or on a company credit card. The rules regarding expenditure apply equally to both expenditure channels. Where there are policy allowances, e.g. for meals, these are the maximum acceptable limit, but all colleagues are expected to be reasonable, manage business costs and endeavour to keep these to a minimum. The Group reserves the right not to reimburse expenses in circumstances where an colleague makes late claims repeatedly.

Colleagues are responsible for the accuracy and completeness of expense claims. Corporate cards should only be used for business expenses. Colleagues who have a company mobile phone should use these for calls when travelling on business. If a personal mobile phone is used, the cost of business calls can be claimed.

## What should I do?

- Make claims monthly, they will be deemed late if the expense being claimed is more than three months old
- Get them authorised and signed off by line managers and budget holders where the expense is being charged. Where the line manager is the budget holder single approval is sufficient
- Approvers have a responsibility to ensure that the expense claim is accurate and valid
- Ensure claims are supported by itemised receipts

**Q** My manager has asked me to pay for a team meal so that they can approve it, I think that they asked this because it is outside of policy and over the permitted level of expenditure and their manager would not approve it. What should I do?

**A** If you feel comfortable to, raise it with your manager, if not speak-up. Policy requires that the most senior colleague present should pay.

**Q** We have a daily allowance for breakfast, lunch and dinner when working away on business. What if breakfast is included in the hotel booking and/or lunch is provided?

**A** The purpose of the allowance is to ensure the colleague has subsistence when working away from home, if meals are provided then these meal allowances should be deducted from the daily allowance.



## 2 Travel & Expenses

**Q** When completing my expenses for a recent business trip, a colleague suggested that I should enter a false claim and say that I lost the receipt. When I questioned him on this, he said ‘everyone does it, where’s the harm?’ Is he right?

**A** No – this is fraud and is not acceptable under any circumstances. If you believe that a colleague is submitting fraudulent expense reports you should discuss it with your manager or report it through the whistle-blowing facility.

**Q** I am travelling to Denmark on a business trip and my wife has a few days off, would it be okay for her to join me?

**A** When personal travel is combined with company travel, colleagues will be reimbursed only for the business-related expense. Spouses, family members or others are not permitted to travel at the Group’s expense. They can travel with the individual providing it does not interfere with the colleague’s work and all costs related are picked up by the colleague.





# 3

## Protecting Our Information



# 3

## Protecting Our Information

### What should I know?

During the course of your employment you are likely to come into contact with and use confidential personal information about people, such as names and addresses or even information about clients' circumstances, families, health and other private

matters. We are committed to ensuring this information remains secure at all times as failure to keep this information secure may result in significant fines, reputational damage and prosecution.



# 3 ICT Acceptable Use

## What should I know?

Colleagues are encouraged to use communication technology, including email and the internet at work as a fast and reliable method of communication with significant advantages for the business.

Communications made by colleagues reflect upon the Group and if not handled correctly can result in a number of commercial, professional and legal problems. The IT Acceptable Use Policy clarifies what we expect from colleagues and their responsibilities when using our information technology and communications facilities.

Inappropriate use of The Group systems or data, whether inadvertent or deliberate, can expose The Group information and IT systems to risks including loss or theft of information, technical attacks, compromise of IT systems and service failures, in addition to legal and contractual issues. If you are not sure about anything check with your manager or contact [informationsecurity@ivcevidensia.com](mailto:informationsecurity@ivcevidensia.com).

## What should I do?

- Ensure that personal data collected, held, processed, used or destroyed by the Group is processed in compliance with Data Protection Regulations
- Understand that the Group information, networks and systems and anything created, stored, sent or received using them are, and will remain, the property of The Group
- Be responsible for all transactions performed using your access all communications are expected to meet professional standards
- Be mindful of the fact that any communications may be used to resolve compliance, legal or employment queries
- Ensure that access to Confidential and Highly Confidential information is restricted to those people who are authorised to access the information

## Do not

- Bind yourself or the Group to any agreement without express authority to do so
- Breach any copyright or other intellectual property right when undertaking communications
- Share any The Group information unless authorised to do so, and the recipients are authorised to receive it
- Use the Group Information, systems, or networks in a manner that poses a threat to the confidentiality, integrity or availability of Company information, systems or networks or is unlawful
- Use the Group IT system access that is not assigned to you

# 3

## ICT Acceptable Use

**Q** I've been given someone else's IT access to use, is this right?

**A** No, all IT access should be unique so you can be responsible for your IT use.

**Q** My manager has asked for my password, do I need to give it to them?

**A** No, you should never tell anyone your password or let them use your account (even IT). Point out that the Acceptable Use Policy has the rule not to share your password.

**Q** I've received a suspicious email, what should I do?

**A** If you receive an unexpected email that contains links or attachments then do not click on them. The email could be a phishing email trying to trick you into exposing your IT access to company information. Please use the 'Report Message' button in Outlook or forward to [informationsecurity@ivcevidensia.com](mailto:informationsecurity@ivcevidensia.com)

**Q** My colleagues leave their desks and I can see what they are working on as they leave their computer open when unattended, is this OK?

**A** Leaving a computer unlocked when unattended is the same as sharing a password! Everyone has a responsibility to lock their computer every time it is left unattended (outside of our direct view). This can be done by pressing the windows key and L at the same time.

**Q** One of the team's computers has gone missing, but no one seems bothered, should it be reported?

**A** Any loss or risk to information should be reported to the information security team ([informationsecurity@ivcevidensia.com](mailto:informationsecurity@ivcevidensia.com)), the quicker it is reported then the better chance of reducing the impact of the incident.

# 3 Data Protection

## What should I know?

The Group recognise the importance of having effective privacy protections in place and are committed to compliance with applicable data privacy laws, regulations, internal policies and standards.

Personal Data is information relating to an individual who can be identified (directly or indirectly) from that information. The correct and lawful management of Personal Data will maintain confidence in us and will enable successful business operations.

Failure to treat Personal Data in accordance with applicable law may result in harms to individuals, investigations, prosecutions, potential fines and damage to our reputation.

We are committed to being concise, clear and transparent about how we obtain and use Personal Data and how, and when, we delete that information once it is no longer required.

## What should I do?

- Comply with the data protection principles ✓
- Complete a Data Protection Impact Assessment when required
- Ensure adherence to the rules and privacy laws that govern marketing and consent
- Keep written records of high risk processing activities
- Take appropriate measures to keep personal data secure
- Report all data breaches here immediately

## Do not

- Disclose or share personal data to third parties unless there is a legal obligation or basis for doing so ✗
- Ignore objections to direct marketing
- Transfer data from the country or origin unless the transfer has been mapped and approved
- Restrict colleagues' rights in relation to their personal data

**Q** I found an unprotected excel file containing colleague personal information on it. We are supposed to protect this information with a password and restrict access, what should I do?

**A** Report this to [privacy@ivcevidensia.com](mailto:privacy@ivcevidensia.com) to enable them to investigate and take the appropriate actions.

**Q** A client has requested that we delete their personal data what do we do?

**A** If you receive a request from a client, please notify [privacy@ivcevidensia.com](mailto:privacy@ivcevidensia.com) team straight away and we will work with you to complete the request in a legally compliant way. The right to erasure does not cover all types of data and is only applicable to certain types and situations.



# 3 Data Protection

**Q** If a third party requests a clinical history what should we do?

**A** Seek the registered client's permission and make a note on the client file of the date and reason for request and that the client agreed or declined.

**Q** Can we use the details provided on the kennel club website to promote our services to breeder(s)?

**A** No, Kennel Club T&Cs state: "The information is for use by prospective puppy purchasers only and should not be reproduced in any manner electronically or otherwise for any purpose whatsoever without the express consent and authorisation of the breeder(s) concerned."

**Q** Miss S says her ex-boyfriend is meant to pay for Fluffy's treatment, can we contact him to chase for payment?

**A** No! If Miss S is registered as the pet's owner, she is responsible for payment. We can't legally contact someone else and chase them for money if they've never entered into a contract/agreement with us.



## What should I know?

Social media is a place where people exchange information, opinions and experiences to learn, develop and access services. It includes blogs, wikis, microblogs, message boards, chat rooms, electronic newsletters, online forums, social networking sites, and other sites and services that permit users to share

information with others. Although it may seem a more informal method of communication, it can be used in law in the same way as an email or a contract. Colleagues are personally responsible for the content published on blogs, wikis or any other form of user-generated media, both internally and externally.

## What should I do?

- If discussing the Group on personal social media make it clear that any views are yours, and not that of the Group
- Personal profiles and related content should be consistent with how you wish to present yourself to clients and colleagues
- Be respectful – do not use any language, make any comment, or engage in any conduct that would not be acceptable in the workplace
- Show consideration for others privacy and for topics that may be considered objectionable or inflammatory
- Respect intellectual property rights (such as trademarks and copyright)

## Do not

- Talk about a new merger or promotion before the official launch
- Forward a work document marked “for internal use only” or “confidential” to anyone outside of the Group
- Comment on work-related legal matters unless you have approval to do so
- Talk about revenues, future products, pricing decisions, unannounced financial results or similar matters with anyone outside of the Group without Group Executive or Country CEO approval
- Site or reference clients, partners or suppliers without approval as above

**Q** I have been requested to speak at an industry conference, I think it would be a great opportunity for myself and The Group, do I need to check with anyone first?

**A** Discuss this with your manager who can advise. They will need to approve this as you will be acting as a spokesperson for us.

**Q** One of our locums has been posting photographs, videos and comments about animals being treated without the consent of the treating and/or operating veterinary surgeon, is this permitted?

**A** No and the professional conduct authority would not approve of this conduct. Advise them that they must remove the posts immediately or you will consider reporting them.

# 3

## Social Media & Communications

**Q** One of my colleagues shares stories of dealing with customers on social media all of the time, should they be doing that?

**A** Absolutely not, revealing confidential information about work in a personal online posting, including information relating to our clients (or any internal information) is one of the expressly forbidden activities in the Acceptable Use Policy. Please mention it to your manager to issue a reminder of their responsibilities.

**Q** One of our customers has posted about their Pets care on social media and have got the details wrong, should I engage them with a reply?

**A** You should not engage with clients on social networking sites, this includes setting up 'Groups', blogging or responding to customer comments, without first receiving the appropriate authorisation and training. Any derogatory references about The Group on social networking sites should be reported directly to the Communications team so that appropriate action can be taken <https://ivcevidensia.com/contacts/>

**Q** How do I know what I can share on social media about work?

**A** IVC Evidensia recognises that many employees make use of social media in a personal capacity and it is OK to say that you work for the company, but you should not include the Company name in your profile name, name of your blog etc. Use of social media when it comes to working for IVC Evidensia should be conducted responsibly and ethically, demonstrating respect for co-workers, customers, confidential information.



[www.ivcevidensia.com](http://www.ivcevidensia.com)