

iNIZIO

Code of Ethics.

March 26



Our Code & Commitments.

PAGE 02

A MESSAGE FROM INIZIO'S CEO

United by a common Code

Our Code of Ethics (the "Code") establishes the behavior we expect of every single person at Inizio and those who represent us. Not only is it fundamental to our legal and contractual obligations, but it also informs how we interact with each other and our stakeholders, including clients, healthcare professionals, patients, regulators, suppliers, and local communities.

Integral to the Code are Inizio's Leadership Commitments (our "Commitments") which set out in more detail how we should all act and interact, and help to foster our positive, supportive, and ethical culture. You can find out more about them over the next few pages.

I urge everyone to carefully read the Code. Not only does it lay out expectations and responsibilities, but it will also help you navigate difficult choices and scenarios. In relation to our Commitments, our Code 'Empowers Everyone' to 'Ask What If?' and 'Do The Right Thing', challenging and reporting situations that appear unusual or clearly wrong.

Who should follow the Code

Inizio's Code of Ethics applies to all officers, directors, employees, consultants, and those representing Inizio and our global affiliates including Accordience (collectively "Covered Persons").

Covered Persons should ensure they understand the Code and the policies and processes cited within it. Covered Persons are empowered to "Ask Yourself" and "Speak Up." The Code does not provide answers to every situation, but it does establish our collective Commitments and provides specific steps to help with difficult circumstances.

We take every report seriously

If you have concerns, I encourage you to speak with your manager or Inizio contact in the first instance. If that's not possible, then please connect with another trusted leader, or a representative of the HR, Legal or Compliance functions. If you prefer to raise an issue outside these channels or make a confidential report, then please see the Speak Up section of the Code or refer to our Speak Up Policy. Every report made in good faith will be taken seriously.

The Inizio Board of Directors is committed to keeping the Code under review, ensuring it stays relevant, and that the policies and procedures it refers to are always appropriate and applicable.

However, please remember that as 'We Work As One', all of us are accountable for upholding the Code and standing in support of our Commitments. Thank you for making the Code a priority as 'We Rise To The Challenge' to better serve our clients, communities, and each other.



Our Code establishes the behavior we expect of every single person at Inizio and those who represent us...all of us are accountable for upholding the Code and standing in support of our Commitments.

Ryan Quigley
CEO, Inizio



Our Code.

Our Commitments

to each other
and our collective
culture/s

Our Policies

and your
responsibilities

Ask Yourself

when faced with
uncertainty

Speak Up

when you know
or feel things are
wrong



We empower everyone

Inizio gives everyone the **support and space to thrive**.

We create an environment where everyone feels listened to; confident to be themselves; safe to speak up; free to experiment and fail; and valued for their unique contribution.

We set clear goals and provide the communication, support, and autonomy people need to own their work.

We motivate people to thrive, to build their careers, and to play their part in our success, and our clients'.

Guidance on making it happen:

Lasting foundations

Focuses

Deliver on Diversity, Equity & Inclusion

Act to remove barriers that impede anyone's access, growth, contribution, or success. Seek to create an inclusive environment where all voices are heard and matter.

Build a supportive culture

Enable autonomy, performance, and growth for everyone through active listening, clear goal-setting, ongoing training and coaching.

Everyday actions

Suggestions

- Listen a little more and talk a little less
- Don't give teams the answers, help them to find them
- Ask more questions to understand what really makes someone tick
- Create a stage for others rather than taking the stage ourselves
- Make the small acts of kindness that help people to feel seen and valued
- Make a conscious effort to ensure that everyone is heard





We rise to the challenge

At Inizio we find ways to **be and do better**, every new day.

Our success and our relationships are built on exceeding expectations. We care about making a difference so we strive to deliver the highest quality, and we always find a way to make it happen.

In a world of change we are calm, resilient, entrepreneurial, and we help others to improve every day. We create energy by recognizing people's commitment and contribution.

Guidance on making it happen:

Lasting foundations

Focuses

Set smart goals

Work with the leaders and managers to set clear, ambitious but achievable goals for everyone, and support them to deliver.

Create the conditions for quality

Provide people with the resources and support it takes to deliver work and experiences of the highest quality. Recognize and reward commitment and contribution.

Everyday actions

Suggestions

- Be there to help people when the going gets tough
- Dig deep and show resilience to inspire others
- Say thank you more often – it goes a long way
- Be available to help people, not to do it for them
- Encourage and help people to step out of their comfort zones more often
- Motivate people to set stretch goals in work and life





We work as one

Inizio **unleashes the power of networks** and collaboration.

We believe in the power of collaboration, in shared goals, and in sharing our collective knowledge, perspectives and skills.

We exemplify the power of openness, listening, and connecting, and we support those around us to discover new possibilities across our vast, expanding network.

Guidance on making it happen:

Lasting foundations

Focuses

Enable collaborative working

Take action to make collaborative working easy and rewarding for people, removing barriers that get in the way.

Make the big picture visible

Communicate and emphasize the opportunities that enable our people to understand and experience more across our network

Everyday actions

Suggestions

- Ask people about what makes collaboration easier, and what gets in the way
- Be an active advocate for the benefits of the broader Inizio business
- Keep people in the loop, and remember they need help and information that only you can give
- Make the effort to ask people about their skills and experiences so you can join unexpected dots
- Be a proactive connector between team and others across the network
- Share inspiration from the outside, and recognize others who do too





We ask 'what if?'

Inizio finds **new learning and possibilities** everywhere.

By asking the question: 'what if?' we allow creativity and innovation to flourish.

We empower our people to learn from mistakes, take risks, challenge norms, and look for perspectives and possibilities that others can't see. Let's recognize our people for learning and for finding new and better ways to meet the needs of our business and our clients.

Guidance on making it happen:

Lasting foundations

Focuses

Encourage curiosity

Actively foster and celebrate a culture of inquisitiveness and willingness to listen, question and continuously learn.

Recognize courage

Remove the fear of failure by creating ways to recognize and reward people who have the bravery to share new ideas, to try the unexpected, to fail and learn from it.

Everyday actions

Suggestions

- Admit when you don't understand something, and show it's okay to ask questions, however basic
- Give people the space and time to really think about problems properly
- Make it clear that ideas are nothing to do with job roles or titles
- Make it safe, easy and rewarding for everyone to share their opinion or idea
- Role model learning new skills and trying new things – in work and life





We do the right thing

Inizio is **accountable and authentic**.

We know that trust is everything, so we make promises to our people and clients carefully, and we take accountability for them.

When things go wrong or we don't know the answer, we have the humility to admit it. Whatever the pressures we take responsibility, do the right thing, treat people fairly, and support our teams selflessly.

Guidance on making it happen:

Lasting foundations

Focuses

Build a culture of accountability

Show the importance of accountability and honesty, creating conditions where people can step up and deliver on promises.

Have the human touch

Work together to create a place that feels fair, honest and safe to ask for help.

Everyday actions

Suggestions

- Always be honest and open about our mistakes
- Remember it's all about our people, not you individually
- Don't be afraid to show people that you're human too
- Show people trust and back them, especially when things go wrong
- Avoid discussions about fault or blame, focus on what we can learn
- Respect people by giving them a realistic rather than a 'rose- tinted' picture



HELP YOU NAVIGATE INIZIO'S REQUIREMENTS

Inizio's policies specify what we are required to do individually and collectively to act within the boundaries of our Code and Commitments, including meeting our legal requirements and fulfilling our responsibilities to stakeholders. Our policy framework includes the Code and subject matter documents which state Inizio's positions and specify the responsibilities of employees, managers and others who work with us. Covered Persons are required to periodically train on these policies and to attest they understand the content and responsibilities within them.

Our policy framework is evolving with the introduction of this Code, our Commitments, and policies which pertain to:

Our People and Places

Our people and how and where we work are fundamental to Inizio's mission and how we deliver for our clients.

We are dedicated to promoting a culture of diversity, equity, and inclusion where our authentic selves flourish. Our Commitments underline and promote this culture, and our people policies help to instil it. Inizio attracts and retains talent that will uphold our Commitments including through our employee referral, total rewards, and continuous learning programmes.

As important is Inizio's desire to sustain safe and healthy work environments where the wellbeing of our employees is nurtured. Our work environments include our facilities, our employee's

hybrid work environments, and where and how we travel for client or business purposes.

Information on our [health and safety practices is found here.](#)

Our Conduct and Integrity

Inizio operates ethically wherever and with whomever we do business.

We do not tolerate bribery or corruption of any kind, nor any other form of financial crime including tax evasion, anti-competitive practices, and circumventing international trade controls. We believe our knowledge and talent delivers mutually beneficial outcomes. We compete fairly and legally for business and will not improperly influence or be influenced in order to obtain or sustain commercial relationships. In this regard, Covered Persons must disclose personal and professional relationships that could conflict with the role and responsibilities they fulfil for Inizio.

Information on our [anti-corruption practices is found here.](#)

Inizio always provides full, fair, accurate, timely and understandable documentation to government agencies and authorities that request or require such from us. In order to do so, we maintain accurate books and records, and robust financial, regulatory, and operational controls, seeking ways to improve these on a continuous basis.

HELP YOU NAVIGATE INIZIO'S REQUIREMENTS

This Code and our Commitments promote openness and respect amongst people that work with and for us. If things seem wrong or indeed are wrong Covered Persons have a responsibility to Speak Up. We protect confidentiality, manage, and investigate concerns seriously, and do not tolerate retaliation in any form. Covered Persons should have confidence that their concerns are important to Inizio, and that by raising them they support and sustain our Commitments.

You can [learn more about Speaking Up here](#), or log a confidential concern here: inizio.ethicspoint.com

Sustaining Our Businesses and Communities

Inizio believes enhancing environmental, social and governance accountability across the Group is not only the right thing to do but is also of critical importance in sustaining our business and supporting our communities. We have established our sustainability strategy which sets out our guiding principles supported by detailed priorities across these three fundamental areas of sustainability.

Additionally, Inizio's Environmental Sustainability Policy underscores our commitment to reducing our environmental footprint and provides a detailed framework for Covered Persons to follow.

You can learn more about Inizio's [environmental sustainability here](#).

Expanding Our Framework

As we continue to connect the capabilities of our businesses, Inizio will expand and refresh our policy framework to ensure our stakeholders know where we stand, and how they can help uphold our Code and Commitments.

While the depth and breadth of our policy framework grows Inizio will sustain our Code and Commitments which will envelop and inform how we meet our legal and stakeholder responsibilities.

More information on [our current policies may be found here](#).

Your responsibilities.

UNDER THE CODE & COMMITMENTS



**Covered
Persons are
expected
to:**

- Act honestly, ethically and in a manner consistent with the Code and our Commitments
- Comply with laws and regulations applicable to your business and the jurisdictions in which it operates
- Raise potential or actual personal conflicts of interest with your manager, another trusted manager, Group Legal, or Compliance.
- Maintain accurate company books and records by following Inizio policies including but not limited to those pertaining to financial reporting
- Be aware of and understand all Inizio and business-level policies and procedures that apply to you, your business, and your jurisdiction: complete all mandatory training satisfactorily and in a timely manner
- Promptly Speak Up when you know laws have been broken



**Inizio's
leaders
are also
expected to:**

- Promote the Code and our Commitments, fostering an environment of trust grounded in both
- Communicate the importance of the Code and Commitments to direct reports, ensuring they understand the importance of complying with both, as well as applicable laws, regulations, policies and procedures
- Listen when colleagues Speak Up... Then, provide supportive guidance or direction to those that have raised issues or concerns
- Reinforce Inizio's commitment to non-retaliation. If you observe or suspect retaliation has occurred, then report it immediately

EVERYONE IS EMPOWERED TO

Ask yourself.

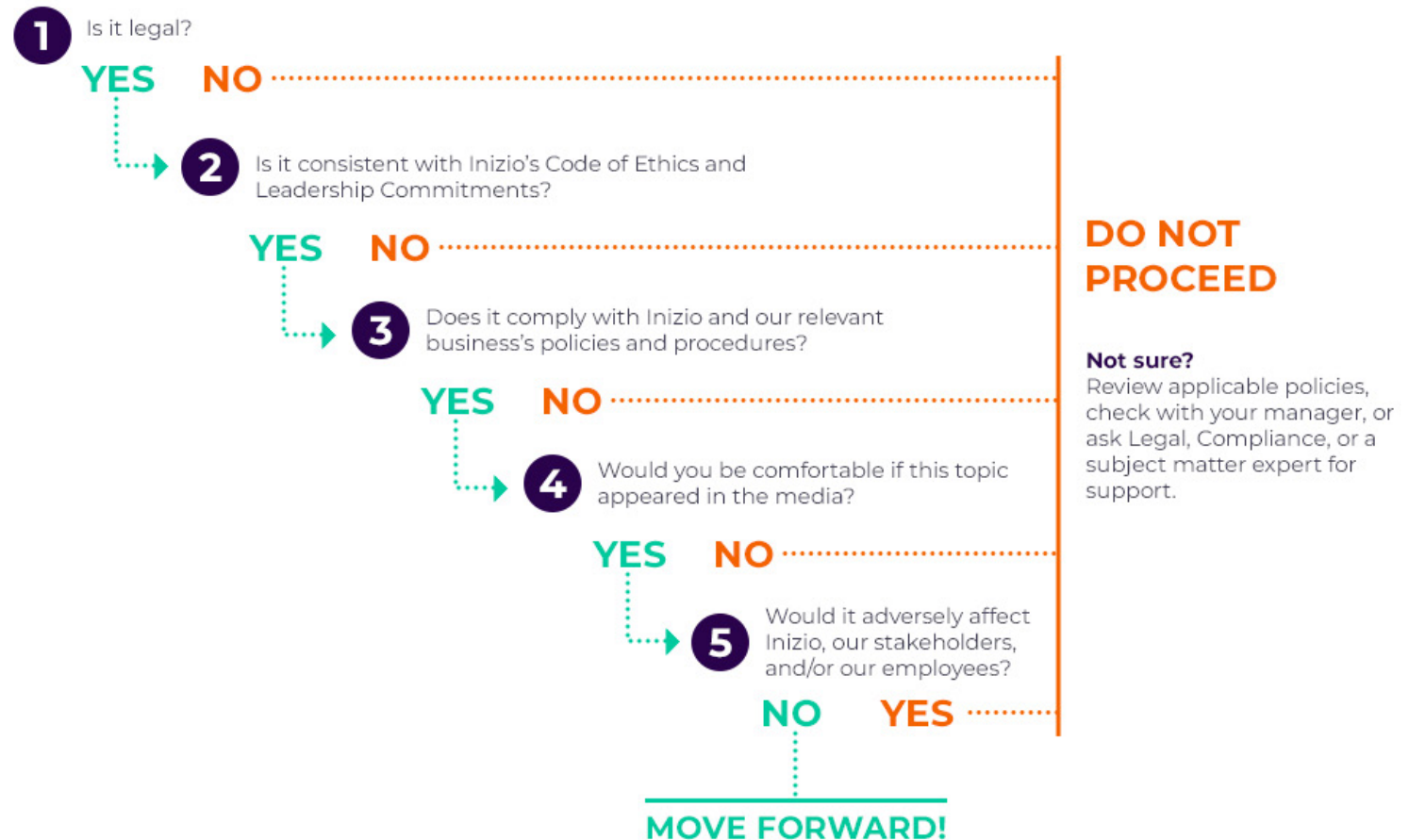
Sometimes it is not always clear what the “Right Thing” is... So how can we “Do It?”

Inizio empowers you to work through these circumstances to the extent you are comfortable doing so. Do seek assistance from your manager or other trusted colleagues if required – they’re here to help.

To navigate tricky situations, it's important you are aware of relevant laws and regulations, Inizio's Code and our Commitments, and applicable Group and business-level policies and procedures.

It is incumbent upon each of us to understand and stay familiar with all of these obligations. We can do so by successfully completing assigned training on a timely basis. This helps us to understand where to turn when challenging circumstances arise.

Our Commitments, common sense, and collaborating with trusted colleagues can help too. If you are initially unsure of how to proceed, walk yourself through the questions to the right, exercising good judgment as you do.



Speak up.

WHEN THINGS ARE NOT RIGHT OR FEEL WRONG

We expect everyone who works with Inizio to respect our Commitments and maintain the highest ethical standards. Sometimes things may not feel right though, or indeed be wrong.

It is very important that you feel comfortable in raising such concerns to ensure that circumstances are addressed and corrected as soon as possible.

Issues and concerns may be reported confidentially by dialling one of the following free phone numbers or here inizio.ethicspoint.com

If you would prefer to dial-in your concern, free phone numbers for 25 additional countries are available at this same web location.

Country	Freephone Number
Austria	0800 068721
Belgium	0800 29 444
Canada	(844) 273-2789
China	400 120 4140
France	0 805 08 05 74
Germany	0800 1862378
Hong Kong	800 962 035
India	000 800 0502 108

Country	Freephone Number
Ireland	1800 903 361
Poland	inizio.ethicspoint.com
Portugal	800 181 736
Singapore	inizio.ethicspoint.com
Spain	900 997 942
United Kingdom	0800 069 8746
United States	(844) 273 2789

You should promptly report genuine concerns that relate to or are in connection with:

- Breaches of law or serious misconduct including financial malpractice and fraud,
- Failure to comply with legal, professional, or regulatory obligations,
- Practices and behaviours that severely undermine our Leadership Commitments, or
- Infringements of our policies and Codes of Conduct including but not limited to quality, health & safety, and environmental practices.

Inizio encourages you to discuss genuine issues and concerns with your manager; another trusted Manager; Group Legal, Compliance or Human Resources; or with the Confidential Reporting Team via the web link or one of the confidential reporting lines listed here.

Reports will be taken seriously, concerns will be investigated where appropriate, and your confidentiality will be respected.

Finally, we wish to assure you that concerns raised in good faith can always be reported without fear of retaliation, even if they turn out to be mistaken.

Retaliation in any form will not be tolerated. Suspected retaliation can itself be reported through the available confidential reporting channels, and any allegations of retaliation will be reviewed and investigated promptly, either alongside or separately from the original concern, as appropriate. Speak Up when things are not right or feel wrong.



A background image showing several hands of different skin tones joined together in a circle, symbolizing unity and teamwork. The image has a purple and blue color overlay.

iNIZIO

It's time to reimagine health.

For more information please visit
inizio.com