



Stephen Saad, Aspen Group Chief Executive

ASPEN'S COMMITMENT TO INTEGRITY

At Aspen we regard our reputation as one of our most valuable assets, and to ensure that we maintain the trust and confidence of our stakeholders, we strive to do business with the highest levels of **Integrity**, beyond simply performing the minimum required by law.

In line with King IV recommendations, a formalised ethics & compliance management programme has been initiated at all of the Group's businesses. This programme is managed by the Group Head: Ethics & Compliance, under the direction of the Board, and the Social & Ethics Committee and is aimed at:

- Assisting the Audit & Risk Committee and the Social & Ethics Committee in assessing the Group's ethics and compliance profile, risks and opportunities; and
- Assisting the Social & Ethics Committee to monitor implementation and compliance with the Group's policies which guide expected ethical and lawful behaviour.

The programme is focused on implementing the high standards of ethical and lawful business conduct that we have established for ourselves as a Group, and includes:

- Living our values whereby employees are guided by our Code of Conduct, and its supporting framework of policies and procedures, which are aimed at maintaining these high standards;
- Promoting ethical and legally compliant behaviour and leadership, both internally and in relation to third parties acting on Aspen's behalf;
- Avoiding relationships, situations or engagements which may result in conflicts of interest, and to disclose these in line with the relevant policy provisions, when these conflicts cannot be avoided;
- Assessing and mitigating ethics, legislative compliance, and reputational risks;
- Training and communications to engage employees in applying our Code of Conduct and other policies and procedures which are relevant to ethics and legislative compliance;
- Maintaining an effective confidential whistle-blower service through which concerns about potentially unethical, unlawful or unsafe conduct can be reported (anonymously if preferred) and investigated; and
- Regularly monitoring and testing the programme in order to determine its effectiveness, that it is operationalised and embedded into Aspen's day-to-day business, and that opportunities for improvement can be identified.

Aspen is a member of the [Ethics Institute SA](#) and a signatory to the [UN Global Compact](#).

Thank you for your support of this programme and your continued commitment to ensuring that we uphold our value of **Integrity** and placing patients at the centre of our operations.

Kind regards

Stephen Saad
Aspen Group Chief Executive
25 October 2021