

## Regulatory compliance at Assura

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### Overview and principles

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Assura strictly complies with legal and regulatory standards. We strive to uphold the highest of ethical standards and work openly with all regulators and governing bodies to promote good practice.

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### Obligations

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#### Responsibilities of Senior Managers:

- To be open and co-operative with all regulators and governing bodies, disclosing appropriately any information which the regulators might reasonably expect.
- To pay due regard to the interests of our customers, suppliers, employees and shareholders and to treat all parties fairly.
- To observe proper standards of market conduct.
- To take reasonable steps to ensure that all business activities are controlled effectively and compliant with the relevant requirements and standards of all relevant regulatory systems.

#### Responsibilities of Managers:

- To act with integrity and demonstrate due skill care and diligence in the execution of your duties.
- To understand the legal and regulatory compliance requirements associated with all work undertaken.
- Ensure that all policies and documents compliant and consistent in approach.
- Review third-party contracts in accordance with all requirements.
- Lead periodic compliance reviews and take prompt corrective action where non-compliance is identified.
- Ensure all employees are trained in all aspects of legal and regulatory compliance and understand how to apply all relevant policies and procedures to their role.

#### Responsibilities of Employees:

- Understand and fully comply with all policies, procedures and safe practices at work that are relevant to your role, ensuring that your knowledge and competence is maintained always.
- To identify and eliminate non-compliance whenever possible. Escalating concerns where it is not.
- Question unsafe or improper activities and stop work where necessary to address issues.

To openly disclose all matters which may breach company policies and procedures. This may include but is not limited to third party relationships, insider trading, fair competitor or bribery.

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### Policy scope

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Assura works with a number of regulatory bodies/ regulations these include, but are not limited to:

- London Stock Exchange and our secondary listing on the Johannesburg Stock Exchange
- Financial Services
- Authority Health & Safety Executive CDM
- Regulations

This document sets out the overarching principles of conduct and standards of work. It should be read in conjunction with the employee handbook and Assura's policies and procedures.

Compliance with this policy is a condition of employment at Assura. Failure can result in disciplinary action which may result in the termination of your employment.

Concerns should be escalated immediately. It is not necessary to know that a breach of our code or policies has occurred and concerns can be raised anonymously through any of the following channels:

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- Head of Human Resources or Head of Legal
  - Whistle Blowing hotline Expolink
  - Next level of management
  - Assura Board of Directors

Assura will fairly examine every concern through a robust and documented investigation process.

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#### Other related matters

All records relating to this policy kept by HR in accordance with GDPR regulations and will be confidentially destroyed thereafter. This policy will be reviewed regularly to ensure that it continues to meet legislative requirements.

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