



ASCENTIAL

Act today, win tomorrow.

The Ascential Code

Your essential guide to how we work

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Duncan Painter
Chief Executive Officer

CEO statement

As Ascential continues to develop as a truly global company, we remain committed to being excellent in all we do, ensuring each of our decisions are underpinned by our values and maintaining our reputation as a trusted employer, business partner and investment choice.

It will always be the case that our people drive our success. Our continued success depends on each and every one of us consistently doing what is right. Everyday collectively we have a responsibility to uphold our core values and to make good ethical decisions.

Our Code emphasises, informs and reminds us of the role we all play in maintaining our values and reputation. It guides us to make good ethical decisions in everything that we do.

It has been created for you. Read it and use it to guide your actions.

Please do not hesitate to speak up if you have a concern. If you see something wrong we encourage you to raise it and please reach out for support and guidance anytime you are unsure.

We can be very proud of our business, it is one that is built on the secure foundations of our values and good ethical principles. Let's continue to build upon these. Please use our Code to guide you every day, so we can continue to be proud of the work we do and how we do it.

Our values are who we are

Focus

We ruthlessly prioritise and always keep things simple.

Facts

We always use data and insight to inform our work.

All-in

Once we commit we deliver, with a clear focus on outcome.

No silos

One team, one face, one reputation.

Be creative

We are smart, pro-active innovators.

Trust, transparency and openness

Transparency inspires trust and empowers.

Empathy

We can be relied upon for fairness and consideration.

About our Code

Our Code provides an overview of our company policies and some of the laws and regulations that apply to us and the work we do. It serves as an essential guide, setting out our standards and expectations as well as the people who are available to help.

We conduct business around the world so there may be instances where our Code and policies may differ from local laws, cultural norms and regulations, or where it is difficult to know what to do.

We ask you to always use good judgement and common sense, to only act in ways that support our shared values and ethical culture.

Nothing in our Code is intended to require you to break local laws or regulations. If there is ever a conflict between the two, if a cultural norm is inconsistent with our core values and ethical principles, or you are just unsure about the right course of action, always ask for help.





Who should follow our Code?

Team members this is each and every one of us within Ascential's brands globally:

- Be ethical, trustworthy, transparent and open in everything you do.
- Know our Code and its related policies, in particular those that relate to your work.
- Follow our Code.
- Complete all required training.
- Use the Speak Up service and report any concerns about possible misconduct or violations of our Code, our policies or applicable laws and regulations.

Managers lead by example and always with honesty and integrity. Managers are required to actively uphold and operate in accordance with the standards and principles set out in our Code.

Every manager is responsible to support and help team members understand our Code. We also ask our managers to encourage team members to raise questions, to share concerns, and to foster an environment where all team members can do so in good faith without any fear of consequence.

Partners (including our consultants, suppliers and joint-venture partners) are an extension of our organisation and therefore are expected to consistently act in accordance with our Code, to meet our expected standards; as well as their contractual obligations.

How to raise a concern

We are committed to nurturing open, inclusive and safe working.

We actively promote a Speak Up culture, where anyone can ask questions or report a concern without fear of consequence.

If you Speak Up, ask a question or report possible misconduct, you are doing the right thing.

Under no circumstances will you suffer adverse consequences if you Speak Up.



Asking for help or raising a concern should be as easy as possible

There are a number of ways for you to tell us when something is wrong. In each case your confidentiality will be protected:



Talk to your manager

Often they are in the best position to understand your concern or take the appropriate action.



Reach out to others at Ascential

Speak to any other senior member of staff you trust and respect. Your HR representative or a member of the Legal and Compliance team are experienced and open to understanding your concern.



Use our Speak Up service



Call 1-866-921-6714 in North America
00-800-2002-0033 in the United Kingdom
(All other countries see website for numbers)



File a report at
www.integritycounts.ca/org/Ascential



Email
Ascential@integritycounts.ca

Four steps to making good decisions

1 Read our Code

It serves as the key resource and guide to help you make good decisions.

But... Our Code will not tell you exactly what to do in every situation. There may be times when the best choice is unclear or you just feel uncomfortable.

2 Pause

Before you act and consider how to approach the situation.

3 Think

Is it legal?

Does it reflect our values?

Does it build or maintain trust?

Would I feel comfortable if my team, friends, relatives or the general public knew about it?

If the answer to any of these questions is 'no' or 'not sure' then...

4 Ask for help

Talk to your manager

Reach out to others

Use our Speak Up service

We are
committed to
ethical and
safe working



We respect others

Equality, diversity and inclusivity are integral to us

We are committed to attracting, maintaining and supporting a diverse business. Where everyone feels comfortable to contribute their ideas and opinions and to be themselves. We are better when we draw on our full range of collective experience.

We all have a part to play fostering and supporting equitable, diverse, inclusive and respectful working, in driving a positive environment and recognising the strengths and talents of all. This is why any form of discrimination, violence or harassment will never be tolerated.

Know your responsibilities

- Treat each and every person with whom you work with respect, whether they are a team member, customer or partner.
- Recognise the role you have to play to ensure our equitable, diverse and inclusive culture thrives - seek out opportunities to learn, ask questions and develop.
- Always be mindful of the language you use.
- Take positive action to promote a respectful, decent and fair work environment.
- Always Speak Up if you see or suspect discrimination, harassment, bullying or abusive conduct – whether physical, verbal or visual. Any concern will be managed sensitively and confidentially.

Use the guidelines above and check the relevant policies.

If you have any questions or concerns, please contact HR or use the Speak Up service.

Relevant policies

[Equal Opportunities Policy](#)

[Whistleblowing Policy](#)

During team calls, my manager seems to repeatedly shut down and exclude the views of one of our team? Is this discrimination?

It depends, but regardless, the situation creates a negative work environment and conflicts with our commitment to maintaining a respectful and inclusive workplace. If you are comfortable doing so, speak to your manager. If you prefer, share your concerns with another manager, HR or use the Speak Up service.

Whilst in the office I overheard a senior leader from another brand shouting at a junior team member and threatening them. Should I say something?

Yes. We have a zero tolerance policy towards any form of violence or threatening behaviour at work. If it is safe to do so, ask the person in question to stop. Or share your concerns immediately with your manager, a senior manager you trust, HR or use the Speak Up service.

We promote well-being and working safely

At Ascential people are our priority

This is reflected in our commitment to the care we take for the health, safety and well-being of team members, our partners and others we work with.

We all have a responsibility to act in a way that does not compromise the safety and well-being of ourselves and others. Below are some of the steps you can take to support our commitment to well-being and working safely.

Know your responsibilities

- Participate in training and familiarize yourself with the Health and Safety protocols for your region.
- Pay attention to any communications and instructions issued by Ascential that are in the interest of your safety and well-being.
- Be alert to your surroundings and observe safe and secure working practices both online and in your physical environment.
- We have a zero tolerance policy on illegal drugs. We ask you to adopt a responsible attitude toward drinking alcohol and when taking prescribed drugs. Seek help from Ascential or externally if you need support.

Use the guidelines above and check the relevant policies.

If you have any questions or concerns, please contact safety@ascential.com, HR or use the Speak Up service.

Relevant policy

[Health and Safety Policy](#)

I work from home regularly, is it my responsibility to ensure a safe working environment at home?

Yes. You should take steps to make your workplace safe and comfortable. You are also required to complete an online desk risk assessment and to participate in any training. You should immediately raise any safety concerns with your manager.

A team member seems to be struggling to cope with work pressures and I'm concerned that it is affecting their well-being. Is it my responsibility to say something?

If you feel comfortable speaking to your team member directly, you could try to approach them. You may also encourage them to reach out to a mental health champion or use our [Mental Health Support](#), including the Employee Assistance Programme. You can also raise your concern with your manager or HR.

We avoid conflicts of interest

Always act in the best interests of Ascential and avoid even the appearance of a conflict

A conflict can happen any time you do something outside of the workplace which might interfere with the work that you do inside the workplace or impact on your ability to make an objective decision.

Know your responsibilities

- There are many ways a conflict might arise, some of the more common situations where a conflict might happen are if:
 - You supervise or conduct business with someone who you have a close personal relationship with.
 - You serve in an advisory role or on the board of directors of another organisation.
 - You invest in a company that might influence - or appear to influence your judgement.
 - You use our name or our property or information without approval to support a charitable, professional or community organisation.
 - You take for yourself a business opportunity that is meant for Ascential.
- If there is a chance that you might have a conflict of interest disclose it to the Legal and Compliance Team or HR as soon as it has been identified so that it can be properly considered, and the right action taken.

Use the guidelines above and check the relevant policies.

If you have any questions or concerns, please contact the Legal and Compliance Team, HR or use the Speak Up service.

Relevant policy

[Conflict of Interest Policy](#)

I work for Flywheel and I have been asked to provide freelance consultancy services for another digital commerce business. Is this permitted?

It is likely this will be a conflict of interest. You should contact both HR and the Legal and Compliance teams. They will review the situation and provide guidance.

There is an open position in the WSGN sales team. I think my sister-in-law would be perfect for the role but I'm worried about suggesting her given our relationship. What should I do?

If your sister-in-law is qualified for the position and would be a good addition to WGSN you should mention this to the hiring manager or relevant HR business partner. However you should have no involvement in the recruitment process and the position should be not one you directly supervise.

We act with
integrity



We keep accurate records

Accurate records are essential to make good business decisions and to comply with the law

Our records keep us accountable to our investors, regulators and others and are the basis on which we make important strategic decisions. There are criminal implications for deliberately creating false or misleading records and so we take our record keeping very seriously.

We all have responsibility to ensure that any records we create on behalf of the company represent the facts objectively and accurately.

Know your responsibilities

- Be accurate, honest and complete in every transaction whether you are recording a sale, preparing a financial statement or simply completing a timesheet.
- Follow our internal processes and controls to ensure our records accurately and fairly reflect all transactions.
- Don't create records of funds, liabilities or assets that don't exist or are exaggerated, and never misreport or mischaracterise information that relates to our business.
- Protect, store and dispose of information in accordance with our policies.
- Cooperate with all requests for information and to cooperate fully with any audits or investigations.

Use the guidelines above and check the relevant policies.

If you have any questions or concerns, please contact your Finance Director, the Legal and Compliance Team or use the Speak Up service.

Relevant policy

[Records Retention Policy](#)

I am a marketing manager at WARC - I don't work in finance. Is accurate record keeping and financial integrity my responsibility?

Yes, accurate record keeping is a job we all share. Expense reports, sales reports, customer records, product data and sales invoices are all examples of everyday transactions that must be accurate, complete and properly recorded.

I saw a team member sign off a sales report for Edge. I am pretty sure they didn't follow the internal sign-off process. What should I do?

Signing off a sales report outside of process is considered a form of falsifying records. You should report what you saw to the Legal and Compliance Team. You can also report using our Speak Up service.

We actively prevent illegal transactions

Be alert for any potentially suspicious transactions and requests

We all need to be vigilant to prevent illegal activity and to ensure we aren't used by others to launder money or facilitate tax evasion.

Money laundering is the process by which the proceeds of crime are converted into assets which appear to have a legitimate origin.

Tax evasion is using illegal means to not pay taxes. Facilitation of tax evasion is the act of a third party to help an individual or organization evade tax.

Know your responsibilities

- Be concerned if a partner
 - is unreasonably reluctant to provide personal or business background information.
 - wants to pay in cash, overpay or pay in a different currency to that of the invoice.
 - is incorporated in a different place from its place of main operations or residence.
 - asks to be invoiced by or to a company other than the contracting parties.
 - wants to receive or pay funds into an offshore account or a bank account in a country different from its place of business.
 - wants to receive or pay funds into or from multiple bank accounts or through a third party.
- wants to receive a refund through a different payment method than through which the original payment was made to us.
- Promptly report to your Finance Director any changes in a customer's details or circumstances; or anything else that might indicate they could be involved in money laundering or tax evasion.

Relevant policy

[Anti-facilitation of Tax Evasion Policy](#)

Use the guidelines above and check the relevant policies.

If you have any questions or concerns, please contact your Finance Director or the Legal and Compliance Team or use the Speak Up service.

I work for Lions. One of our awards entrants has asked if it can pay through a mix of different accounts using a combination of cash and cheques. Is this okay?

No. This is a suspicious transaction and could indicate money laundering. You should immediately report to your Finance Director.

A partner has asked if it could be paid to a bank account outside of the contracted territory for supply. Can I agree to this?

No, this is a suspicious request that you should immediately report to your Finance Director or a member of the Procurement Team. They will need to be supplied with all the relevant information to advise whether, and if so how, to continue the commercial relationship with the partner.

We do not tolerate bribery or corruption in any form

We choose to lose business rather than secure it through a bribe, kick back or improper payment

Our business and our brands have been built upon and continue to grow by being trusted and respected partners - this is how we always compete for business.

A bribe is something offered in exchange for a decision or an advantage, it might not be cash ; it could be a gift, a favour, an incentive or similar.

We never offer bribes, accept bribes or let others bribe for us. And we do everything we can to prevent bribery by others who conduct business on our behalf.

Know your responsibilities

- Always Speak Up if you see or suspect a bribe.
- Never offer, authorise or accept bribes, small payments or anything else to obtain a commercial benefit or to speed up what should be a routine activity.
- Never ask for payment or anything else any of our partners for improper gain, including your own personal gain.
- Promptly report to the Legal and Compliance Team if you have been asked to give anything of value to a government official or any other partner.

Be accurate and complete in recording payments and expenses

[We Keep Accurate Records](#) so that the transaction is clear and fully disclosed.

Use the guidelines above and check the relevant policies.

If you have any questions or concerns, please contact your Finance Director or the Legal and Compliance Team or use the Speak Up service.

Relevant policies

[Anti-bribery and](#)

[Corruption Policy](#)

[Gifts and Hospitality Policy](#)

We are in the process of obtaining a government permit in India. I have been told that the best way to get the permit I need is to hire a consultant who will take care of it. The consultant has asked for a retainer of \$10,000. Do I need to worry about what the consultant does with the money?

Yes, we need to ensure money is not used to improperly obtain the permit. Contact the Legal and Compliance Team and the Procurement Team to conduct due diligence and support the contractual process.

I have been asked to make a small payment to a minor official to obtain approval for our event to take place. We are under pressure to find a venue and this type of payment is not against the law in my country. What should I do?

The laws in some countries impose big penalties for bribing government officials anywhere in the world, including UK and US laws. We are required to comply with these laws, therefore, we never make payments or offer items of value, at any time. Please contact the Legal and Compliance Team to support to secure the venue.

We follow the rules about gifts and hospitality

Do not give or receive anything that is inappropriate

We recognise that offering or receiving responsible hospitality to meet, network and improve relationships with customers and contacts is often recognised as a normal part of business, however it is illegal to give or receive something (including gifts and hospitality) which may be perceived as a bribe.

We should never give or receive gifts or hospitality where it may create a feeling of obligation or an incentive to behave in a certain way.

Know your responsibilities

- Familiarise yourself with the value limits set out in the [policy](#).
- Always turn down an offer of a gift or hospitality if it is being given to influence a decision or behave in a certain way, even if it is within the value limits of the [policy](#).
- Contact the Legal and Compliance Team if you feel that you refusing a gift or entertainment might be culturally insensitive or inconsistent with local business practices.
- Never offer any gifts or hospitality to any government or public officials, regardless of the value. Immediately contact the Legal and Compliance Team in any situation where you are asked to give anything of value.

Use the guidelines above and check the relevant policies.

If you have any questions or concerns, please contact your Finance Director or the Legal and Compliance Team or use the Speak Up service.

Relevant policies

[Gifts and Hospitality Policy](#)

[Anti-bribery and Corruption Policy](#)

[Expenses Policy](#)

I received a gift from one of our suppliers I know exceeds our value limits. What should I do?

Return the gift and politely explain our policy. If the gift is perishable like flowers or a hamper, where return is not really an option you will need approval from Finance Director and to declare it using the Speak Up service.

I have two standard tickets to a concert. Can I take a prospective customer?

Yes, this is likely to be considered responsible hospitality. However, if the hospitality is estimated to be in excess of £250 (or the local equivalent) per person please obtain approval from both your line manager and Finance Director; and declare it using the Speak Up service. Hospitality that is lavish or expensive may be considered a bribe and therefore must be authorised and tracked for compliance purposes.

We follow trade sanctions laws

We will not do business with sanctioned countries, groups, companies or individuals

Sanctions are restrictions put in place by countries and international organisations for political reasons.

We are required to trade legally and respect all sanctions related laws imposed by the UN, the EU, and the UK and US governments. Therefore, we always carefully assess business opportunities with countries that are subject to trade embargoes or economic sanctions.

Know your responsibilities

- Always bear sanctions in mind when planning any commercial activity, such as contracting (customers or suppliers), awards and calls for content and speakers at our events.
- Always check the [policy](#) to find the current list of sanctioned countries.
- We do not business with blacklisted sanctioned countries.
- We may be able to do business with an entity, individual or company located in a greylisted sanctioned country, but you must follow the process set out in the policy.

Use the guidelines above and check the relevant policies.

If you have any questions or concerns, please contact your Finance Director or the Legal and Compliance Team or use the Speak Up service.

Relevant policy

[Sanctions Policy](#)

We have received an awards entry for Cannes Lions and we are aware the entry is from a grey listed country. Can we accept the entry?

You may be able to accept the entry. But before you do, you must first complete a sanctions check and obtain approval from your Finance Director.

A prospective customer is from Iran as this is a blacklisted territory they offer to invoice us from a different company to avoid the sanctions rules. What should I do?

Politely explain to the prospective customer that this is a breach of our policy. We cannot deal with businesses and representatives from blacklisted countries, irrespective of where payment is made.

We do not trade on inside information

Know the kinds of information considered inside information

We may come into information about Ascential (or another company) that has not been made public but if it might influence someone to buy, sell or hold shares. This information is known as inside information.

Trading shares on inside information is against the law.

Know your responsibilities

- Do not buy or sell shares in Ascential (or another company) if you have inside information relating to that company.
- Do not tell others (family, friends or other team members) about any inside information you've heard (even if you have come across it accidentally), or advise them based on inside information you know.
- Do not buy or sell any Ascential shares if you are advised by Ascential that you are subject to inside information or in a trading blackout period.
- Do not make untrue or misleading statements about Ascential or circulate rumours to give a false impression about Ascential.
- Be aware you do not have to deal in shares yourself to be subject to the penalties of breaking these regulations.

Use the guidelines above and check the relevant policies.

If you have any questions or concerns, please contact the Legal and Compliance Team or use the Speak Up service.

Relevant policy

[Employee Share Dealing Code](#)

I'm working on a project which I have been told is inside information as it could affect the share price. If I tell my spouse and they mention it in confidence to a friend, who buys shares in Ascential have I committed an offence?

Yes. In fact, you will all have committed an offence. The law not only prohibits the buying and selling of shares based on inside information. It also prohibits you from tipping off a friend (or anyone else) for them to buy or sell shares.

I have inadvertently found out from one of my customers that their company J. Hook Limited is being taken over by Neverland plc, whose shares are listed on the London Stock Exchange. Can I buy shares in Neverland plc?

No, you have obtained inside information. If you buy shares in Neverland plc before its takeover of J. Hook Limited is made public you will be guilty of insider trading - this is a criminal offence.

We compete fairly and honestly

Always protect and promote free and fair competition

It is free, fair and open competition that drives success, that is why we compete in our markets based on the quality of our brands, our services and products and why we avoid any conduct which could prevent, restrict or distort the free trade of markets.

Competition or anti-trust laws set out the rules to ensure markets trade freely and fairly.

Know your responsibilities

Dealing with competitors

- Never seek, exchange or accept commercially sensitive information. For example: pricing, costs, margins, trading terms, marketing plans or new product launches.
- Never agree or even discuss with competitors to: fix prices or other terms; limit production; allocate territories or products or customers; or refuse to deal with any customer or partner.
- Do not use a trade association as a forum for discussing or agreeing a common approach to a customer or to a commercial issue such as promotions.
- Do not prevent another company from entering the market.

Dealing with customers

- Never seek or accept commercially sensitive information about competitors from

customers or other third parties.

- Never discuss one customer's terms with another.
- Do not agree resale prices, fix a minimum resale price or incentivise customers to follow pricing recommendations.
- Do not force customers to buy something by tying it to something they do not want.

The rules are often complex and the compliance requirements can vary depending on circumstances and territory. Contact the Legal and Compliance Team for support.

If you are present in a meeting or a call and are concerned about the conduct, leave and promptly inform the Legal and Compliance Team of the discussions.

My team member at Yimian used to work for a competitor. They told me that they have the competitor pricing strategy for next year on their personal laptop and asked if I would like to see it. What should I do?

You should politely explain to your team member that you cannot discuss or accept any information relating to competitor pricing, and that the information should not be disclosed to anyone. Contact the Legal and Compliance Team to discuss what to do next.

I bumped into an old friend, who tells me they now work for a competitor. During our conversation they ask me how business is going? What should I do?

There is no problem in responding to your friend in a general, non-specific way, just be careful not to share commercially sensitive information, even if you are asked or pressured to do so.

Use the guidelines above and check the relevant policies.

If you have any questions or concerns, please contact the Legal and Compliance Team or use the Speak Up service.

We operate
responsibly



We protect our assets and resources

We are all custodians of the tools we use to conduct our business

Each of us is entrusted to safeguard our assets and resources, to use them responsibly and appropriately, and to protect them from loss, damage, waste and improper use.

Know your responsibilities

Protect our systems

- Ensure the physical security of hardware that is assigned to you.
- Protect your password(s).
- Do not install unauthorised software, applications, hardware or storage devices on your computer.
- Do not access our network through unauthorised applications or devices.
- Do not use unlicensed software or make copies of software to use at home or for someone else to use.
- Be alert to phishing scams or other attempts to uncover sensitive personal or corporate information.

Protect our information

- Only share confidential information when there is a legitimate reason for doing so.
- If you share it with someone outside of Ascential, obtain a non-disclosure agreement in advance.

- Always protect Ascential confidential information even after your employment with Ascential ends.
- Always protect the information of others. You have a responsibility to not only protect confidential information about our company, but also the confidential information of companies with which we do business
- Do not open suspicious links in emails, even if you know the source.

Protect our property

- Report any property or equipment that is damaged, unsafe or in need of repair.
- Do not lend, sell or give away any Ascential property.
- Any petty cash held, cheque books and banking tokens/fobs are securely maintained at all times.

Relevant policies

[Cyber Incident Policy](#)

[Acceptable Use Policy](#)

[Data Classification Policy](#)

Use the guidelines above and check the relevant policies.

If you have any questions or concerns, please contact cyber@ascential.com or use the Speak Up service.

I believe some commercially sensitive information has been accessed without authorisation. What should I do?

Report immediately to cyber@ascential.com. The incident response team will investigate and take any further steps to manage the risks most effectively.

Where personal information is compromised, we have regulatory requirements to make notifications within 72 hours, so please report it as soon as you are aware.

I will be travelling to our Hong Kong office over the next few weeks and don't really want to have to take my laptop. I know I'll be able to get access to my personal email over the internet, can I just set up a rule in my work inbox to auto-forward my emails to my personal email account?

No, you should not auto-forward business emails to a personal email account. Business emails are confidential information, they need to be protected and held within our information security systems.

We value and respect our partners

We source responsibly, ethically and lawfully

Ascential's supply chain is truly global and responsible sourcing is key to our success. This is why we choose partners who not only support and maintain our standards for quality, service, price and reliability, but also our values. We hold our partners to the same standards as we do ourselves and look to drive excellence in all areas.

Know your responsibilities

- Do your part - Hold all partners to our high standards and ensure they operate ethically. Bring the Third Party Code of Conduct and our Code to their attention and make sure our partners always operate in a way that is consistent with the codes and in compliance with the law.
- Always engage the Procurement Team when potential total contract value is over £30k (or over £10k for technology).
- Always ensure you have checked the [Preferred Supplier List](#). We may already have a contract in place with a partner who serves your needs.
- It is always your responsibility to track and monitor key elements agreed in a contract with a partner. This is how you make sure the desired service goals and outputs are delivered.

Use the guidelines above and check the relevant policies.

If you have any questions or concerns, please contact the Procurement Team, the Legal and Compliance Team, or use the Speak Up service.

Relevant policies

[Guide to Working with Procurement](#)

[Third Party Code of Conduct](#)

I need external support to ensure delivery of a new product for Intellibrand. I have very good market knowledge and know the best partner for the job. What should I do?

Please engage the Procurement Team to discuss.

While your market knowledge is valuable, the Procurement Team are experienced to support the process and ensure the right partner is engaged based on clear standards and expectations. The Procurement Team can also review and benchmark the market to ensure any partner is engaged fairly and equitably and will set clear commercial and contractual expectations.

We are considering deferring the launch of a new Coloro product, but we have engaged a partner and they are ready to initiate the launch plan. What should I do?

Please engage the Procurement Team. They can advise any financial or contractual implications of any decision and can also advise how to manage the circumstances responsibly and transparently.

We keep personal information private

Please ensure you respect the privacy of others and protect their personal information

We always take the necessary steps to handle the personal data entrusted to us by our customers, team members, partners and others. We handle their personal information with care.

Data privacy laws prescribe how to responsibly collect, store, use, share, transfer and dispose of personal information and we strive to comply with those laws everywhere we operate.

Know your responsibilities

- Always follow our policies and procedures for the handling of personal information.
- Know the kinds of information considered personal information.
- Ensure that any personal information you collect, process, have access to - or others do so on your behalf - is only used for the business purpose for which it was collected.
- Only use and retain personal information for as long as necessary to accomplish the purpose for which it was collected.

Use the guidelines above and check the relevant policies.

If you have any questions or concerns, please contact the Legal and Compliance Team or use the Speak Up service.

Relevant policy

[Global Data Protection Standards and Procedures](#)

I work at Flywheel and want to run an innovative 'big data' analytics project to obtain behavioural insights. How do I assess the data privacy risks?

This project may involve high risk processing of personal information. Seek advice from the Legal and Compliance Team and the IT team before you proceed.

I came across an unprotected spreadsheet within Money 20/20's file system. The spreadsheet contains sensitive employee information that I should not have access to. I know that we need to protect this information, but I am not sure how?

You are correct, we need to protect this information carefully. Please contact cyber@ascential.com for them to investigate and ensure adequate technical and security controls are in place.

Your acknowledgement

- You have read and understand our Code.
- You confirm you have had the opportunity to ask questions regarding our Code and you understand how it relates to how you work and your role.
- You agree to always observe and uphold our Code and its principles.
- You will always ask questions or ask for help when you are not sure about the right course of action.
- You agree that you will complete any required training.
- You understand you are free to Speak Up and to report any suspected violations of our Code.
- You confirm you know where and how to access our Code for your future reference.

ASCENTIAL

If you have questions about our Code

Please contact

- **The Legal and Compliance Team**
- **Human Resources**
- **Use our Speak Up service**



Call 1-866-921-6714 in North America
00-800-2002-0033 in the United Kingdom
(All other countries see website for numbers)



File a report at:
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Email:
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