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Responsible Marketing & Communications Principles

Our principles for truthful, substantiated and ethical marketing and public relations: for our own communications and the work we produce for clients

Document owner	Managing Director
Approved by	Board of Directors, 9 November 2026
Version / date	Version 1.0, November 2026
Applies to	All employees, workers, freelancers and suppliers producing communications for or on behalf of Twist Health or its clients
Review	Annually

1. Why we have these principles

Twist Health produces communications about medicines, health conditions and care. Our audiences, patients, carers, healthcare professionals and the public, make real decisions based on what we create. These principles set out how we make sure that every social, environmental and health-related claim we make is accurate, substantiated and responsibly delivered. They apply to our own marketing (website, social media, credentials, B Corp reporting) and to the work we produce for clients.

They sit alongside, and do not replace, the codes we already operate under: the ABPI Code of Practice, the BHBIA Legal and Ethical Guidelines for Healthcare Market Research, the CAP/BCAP Advertising Codes, the UK Code of Non-broadcast Advertising, the CMA Green Claims Code and UK GDPR.

2. Principle A: Precise, verifiable and substantiated claims

- Every social, environmental or health claim we make, about ourselves or a client's product or service, must be specific, measurable and capable of being verified.
- Claims must be supported by reliable or scientific evidence before publication: peer-reviewed data, regulatory-approved information (for example the SmPC), recognised third-party certification (B Corp, ISO 14001, EcoVadis) or our own measured data (for example the utilities usage log and GHG baseline).
- We keep the evidence for every claim on file and reference it in the artwork or copy approval record so that it can be produced on request.
- We follow the CMA Green Claims Code: no vague terms such as "eco-friendly" or "sustainable" without explaining what is meant; no claims about the whole business or product when only part qualifies; no cherry-picking favourable data.
- Comparative claims are only made where the comparison is fair, like-for-like and the data is current.

3. Principle B: Truthful, transparent and accountable communication of positive and negative impacts

- We communicate our social and environmental performance honestly, including where we have fallen short. Our annual B Corp Impact Report uses a "what we said we would do / what we did / what we are going to do" format precisely so that gaps are visible.

Certified B Corporation
This company meets high standards of social and environmental impact.

- We do not overstate our B Corp status or the scope of our certification, and we use the B Corp logo only in accordance with B Lab's brand guidelines.
- Where a claim becomes inaccurate (for example a target is missed or a supplier changes), we correct or withdraw it within 30 days.
- We disclose material relationships: paid partnerships, sponsorships, client funding of patient materials and use of AI tools in content creation where it is relevant to how the content should be understood.
- The Managing Director is accountable for the accuracy of Twist Health's own claims; the responsible account director and the client's signatory are accountable for client claims, following the client's medical-legal-regulatory review process.

4. Principle C: Ethical use of sensitive marketing and PR channels

- **Patients and the public.** We never promote prescription-only medicines to the public. Disease-awareness and patient-support materials are balanced, non-promotional, and reviewed under the ABPI Code.
- **Healthcare professionals.** Promotional materials to HCPs are accurate, balanced, fair, objective and unambiguous, and carry the required prescribing information and adverse-event reporting statements.
- **Market research.** We adhere to the BHBIA guidelines on respondent consent, confidentiality, incentives and adverse-event reporting; all team members hold current BHBIA certification.
- **Social media and influencers.** Sponsored content is clearly labelled; we do not use dark patterns, fake reviews, manufactured testimonials or undisclosed paid endorsement. Testimonials we publish are genuine and the author has consented.
- **Children and vulnerable groups.** We do not target marketing at children or exploit vulnerability, fear or health anxiety.
- **Data and targeting.** We use personal data for marketing only with a lawful basis and in line with our privacy notice; we do not buy data lists or use covert tracking.
- **AI-generated content.** AI tools may assist drafting and design, but every output is reviewed, fact-checked and approved by a named team member before use.

5. How these principles are applied

Step	Control
Briefing	Every brief identifies the audience, channel and the regulatory code that applies.
Development	Claims are referenced to evidence as they are written; the reference list travels with the job.
Approval	No material is released without sign-off by the responsible account director; client materials also pass the client's medical-legal-regulatory certification. Twist's own marketing is approved by the Managing Director.
Complaints	Concerns about any communication can be raised through the Stakeholder Grievance Procedure or to the Managing Director and are logged in the grievance register.
Review	These principles are reviewed annually by the Board together with the ABPI Code and BHBIA guideline updates.

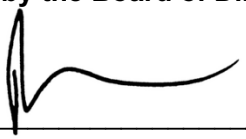
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6. Communicating these principles to our team (PSG4.2)

- These principles are issued to every employee and regular freelancer, stored in the shared B Corp and Sustainability folder on SharePoint, and referenced in section 7 (Ethical Conduct) of the Employee Handbook.
- They form part of induction for new starters alongside the ABPI Code and BHBIA training, which is mandatory for all team members.

Approved by the Board of Directors of Twist Health Limited:

Signed: 

Name: Rebecca Sarson-Hoad

Position: Managing Director

Date: 9 November 2026

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