

**CP 817-02**

<b>Title: The “Speak Up” Program</b>			
<b>Effective Date</b>	19 Dec 18	<b>Replaces Document</b>	CP 817-01
<b>Responsible Unit</b>	Legal and Risk Management		

**1. SCOPE**

This Policy applies to all PAREXEL employees worldwide.

**2. POLICY STATEMENT**

PAREXEL International Corporation Limited, including its subsidiaries and the other business entities it controls (“PAREXEL” or the “Company”), wants to hear from its employees on issues relating to perceived or potential violations of applicable laws, rules, regulations, Company policies and other guidelines, including PAREXEL’s Code of Business Conduct and Ethics (CP 005). Toward that end, the Company has established the “Speak Up” Program which provides guidance to PAREXEL employees on the reporting of a suspected violation or a question.

**2.1 Reporting**

If you become aware of a perceived or potential violation of law, rule, regulation, Company policy or other guideline, including PAREXEL’s Code of Business Conduct and Ethics, or if you have an ethical question or issue, you are encouraged to first notify your immediate manager, your manager’s supervisor, or the Global Compliance Department as soon as possible. Supervisors, Human Resources professionals, or members of the Legal and Risk Management Department who receive a report of a suspected violation must inform the General Counsel and Chief Compliance Officer.

As provided in CP 005, the Company’s Code of Business Conduct and Ethics, you may report suspected violations regarding accounting, internal accounting controls or auditing matters to the General Counsel by letter (to the Company’s principal executive office), telephone or email. Concerns and complaints regarding accounting, internal accounting controls or auditing matters will be forwarded to the Chairman of the Audit Committee of the Board of Directors, as determined by the General Counsel.

**2.2 Hotline**

The Company prefers that you identify yourself when reporting suspected violations so that we can ensure that we have all relevant information to investigate the complaint. However, employees who wish to anonymously report suspected violations can do so using the website found at [www.parexel.ethicspoint.com](http://www.parexel.ethicspoint.com), also known as the Ethics Hotline, which is managed by an independent third party vendor. The Ethics Hotline can be used to submit anonymous reports electronically, or to find the available toll-free telephone numbers for your country. Hotline callers will have the ability to submit their reports in one of nine major languages. The Ethics Hotline can also be accessed by third parties who wish to report an issue.

### **2.3 Retaliation – Zero Tolerance**

PAREXEL is committed to encouraging and promoting a culture where all employees are comfortable reporting suspected violations of Company policies and/or procedures or of applicable laws, regulations and/or guidelines, without fear of retaliation. PAREXEL will not tolerate retaliation of any kind against any individual who, in good faith, reports an issue, plays a role in escalating an issue, or who cooperates during the evaluation or investigation of an issue. Individuals who engage in retaliatory conduct are subject to disciplinary action, up to and including termination of employment or termination of the business relationship.

### **2.4 Bad Faith Allegations – Zero Tolerance**

PAREXEL will not tolerate false claims or allegations made in bad faith by any employee against another individual. Individuals who engage in bad faith allegations are subject to disciplinary action, up to and including termination of employment or termination of the business relationship.

## **3. BACKGROUND**

This policy is intended to provide guidance to PAREXEL employees if they witness or become aware of suspected violations of law, PAREXEL's Code of Business Conduct and Ethics, or other PAREXEL policies or procedures, or if they have ethical questions or issues.

**4. RACI CHART**

	Chief Compliance Officer	General Counsel	Chief Executive Officer	Chair of Audit & Finance Committee
Define & Enforce Issue Escalation Policy	R	A	Ca	I
Determine Issues Requiring Investigation (Financial Related)	R	R	Ca	A
Determine Issues Requiring Investigation (Non-Financial Related)	R	A	Ca	Ca

**Legend:**

- R - RESPONSIBLE**            Person/people who are/will be responsible for implementation of the decision
- A - ACCOUNTABLE**        Individual who has ultimate authority/responsibility to make a decision
- C – CONSULTED**            Person/people whose input/opinion is required for the decision
- C<sub>i</sub> -**                            CONSULTED for input
- C<sub>a</sub>-**                            CONSULTED for agreement
- I - INFORMED**                Person/people who need to know of the decision

**5. REFERENCED DOCUMENTS**

CP 005            Code of Business Conduct and Ethics

**THE FOLLOWING PAGES CONTAIN DOCUMENT ADMINISTRATIVE INFORMATION ONLY**

**6. REVISION HISTORY**

<b>Code- Version</b>	<b>Effective Date</b> 01 Jul 14	<b>Author</b> Dennis Barnes
<b>817-01</b>	<b>Summary of changes:</b> New CP	
<b>817-02</b>	<b>Effective Date</b> 19 Dec 18	<b>Author</b> Marty Mahoney
	<b>Summary of changes:</b> Updated text to provide more clarity. Aligned group names to recent organizational changes.	

This document has been signed electronically on the final pages by the following:

<b>Technical Content Approval</b>	<b>Signatory</b>
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<b>Legal &amp; Risk Management Approval</b>	<b>Signatory</b>
	Mike Crowley Senior Vice President and General Counsel
<b>Authorization by CEO</b>	<b>Signatory</b>
	Jamie Macdonald Chief Executive Officer

## **PAREXEL International Electronic Signature Page**

This page is the manifestation of the electronic signature(s) used in compliance with PAREXEL International's electronic signature policies and procedures and in compliance with applicable regulations.

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