

# CP 817-04

## Speak Up Program

### 1. Scope

This Policy applies to Parexel, its subsidiaries and affiliates, and all directors, officers, current and former employees, agents, contractors, agency workers, job applicants and third parties conducting business on behalf of Parexel (“Representatives”).

### 2. Policy Statement

Parexel encourages a culture of openness and urges its Representatives to raise any concern they may have in relation to how Parexel operates as a business. If there is any practice or behaviour that you believe may be contrary to our Code of Conduct, other Parexel policies, or may constitute an unlawful activity, please escalate your concerns using the procedures set out in this policy. Confidentiality of whistleblowers is guaranteed. Only authorised persons will have access to confidential information. In certain cases, we may be legally required to report to local authorities or law enforcement officers.

### 3. Retaliation

As stated in our Code of Conduct, Parexel is committed to fostering an open reporting environment in which every Representative feels free to raise or elevate concerns about compliance with Parexel policies or applicable laws and regulations without fear of retaliation.

Parexel has a **zero-tolerance** policy with respect to any form of retaliation. Retaliation of any kind, direct or indirect, is strictly prohibited against anyone raising a good-faith concern using the process set out in this policy or who participates in an investigation into such concern.

### 4. Bad Faith Allegations

Parexel has zero tolerance for 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. The investigation will always respect the principles of the presumption of innocence and the right to privacy of the accused person(s).

### 5. Reporting

Each of us has an obligation to ask questions, seek guidance, speak up and share our concerns when we observe or suspect that something is illegal, inappropriate, or violates our Code of Conduct or other Parexel policies, or applicable laws and regulations.

You may notify your immediate manager, your manager's supervisor, your Human Resources (HR) team, the Legal and Risk Management Department (LRM), Internal Audit (IA), or the Compliance Department at [Compliance@parexel.com](mailto:Compliance@parexel.com). Supervisors, HR, IA, or LRM professionals who receive a report of a suspected violation must inform the Chief Compliance Officer (CCO) immediately. The CCO is responsible for informing the General Counsel (GC) of all reported matters and the Chair of Audit, Finance and Compliance Committee (AFCC) for matters involving accounting, internal accounting controls, or auditing matters.

All concerns raised in good faith under this policy will be addressed promptly and treated as confidential information.

## 6. Hotline

If you feel you are unable to report a concern to any of the recommended individuals or resources outlined in the Reporting Section, you are strongly encouraged to report your concerns through our Ethics Hotline, which is hosted and managed confidentially by an independent third-party provider. This reporting tool is available globally 24 hours a day, seven days a week. The Ethics Hotline can also be accessed by external parties including customers, job applicants, suppliers and consultants who wish to report an issue.

The Ethics Hotline enables you to submit information confidentially with the option to report it anonymously. Please keep in mind that reporting anonymously can make it difficult for Parexel to conduct a thorough investigation of your report, but we understand the need to sometimes file reports anonymously. The Ethics Hotline also enables you to communicate anonymously with the Compliance team and to obtain and give follow up on the matter under investigation.

You can submit confidential and anonymous reports electronically in writing at [www.parexel.ethicpoint.com](http://www.parexel.ethicpoint.com) or you can use the available [toll-free telephone numbers](#) listed for your country at [www.parexel.ethicpoint.com](http://www.parexel.ethicpoint.com). Hotline callers have the ability to submit their reports verbally in most local languages to the independent third-party hotline staff.

A tracking and case management process is used to ensure reported incidents are collected in a centralized location, investigated promptly, resolved in a timely manner, and accurately reported no matter where or how they originate. All reports will be acknowledged promptly and no later than five (5) business days after they are received. Investigations are expected to be completed no later than 90 days after receipt of a reported concern. However, more complex investigations may take longer. You will be updated on the status of the investigation and advised when it is finalized, and the matter closed.

## 7. Investigation

All reported matters are taken seriously and investigated in a prompt, fair and thorough manner to determine if any Company policies or applicable laws and regulations have been violated. Matters will be thoroughly investigated by trained investigators who are independent and impartial in order to determine if the reports are substantiated or not, this is in order to ensure the rights of the accused person are protected.

In addition to confirming violations, the investigation will determine whether the preventative measures in place are effective, whether future misconduct could be avoided and if the compliance management system requires adjustment or improvement.

Parexel's CCO, or delegate, is responsible for investigating or overseeing the investigation of all reported concerns regarding compliance with Parexel's Code of Conduct or other Company policies, or applicable laws and regulations. The CCO will notify and update the Senior Leadership Team and the Audit, Finance & Environmental, Social, Governance (ESG) Committee of the Board of Directors (Audit Committee).

Parexel has appropriate escalation procedures in place to deal with circumstances where the potential misconduct involves executive management, financial improprieties, or a danger to any Representative.

Representatives are expected to cooperate fully and completely with any investigation. This means that you must respond truthfully and completely to investigators, answer questions that may be asked in interviews, and provide documents, records, and other materials upon request. The failure to cooperate in an investigation may be considered misconduct and can lead to serious discipline, up to and including termination.

## **8. Reporting to the Board of Directors**

The Audit Committee will receive a summary of reported matters submitted under this Policy together with additional information about any material matters raised at least quarterly. Individual reports may be escalated to the Audit Committee at any time, as necessary and appropriate.

## **9. Local Legislation and reporting channels**

Where required under local legislation, such as local laws transposing the European Union (“EU”) Whistleblowing (“WB”) Directive (EU) 2019/1937, local Whistleblowing guidelines have been published. These describe in detail the additional options available for the local reporting of relevant whistleblowing cases that may qualify for protection under national law in the relevant countries. These guidelines are published on your local country Intranet page and on the Compliance Pulse page.

You may always continue to report matters via our global channel.

## 10. RASCI Chart

	Chief Executive Officer (CEO)	GC	CCO	Managers	AFCC	Employee
Creation, Maintenance, and Communication of Policy	C <sub>a</sub>	A	R		C <sub>i</sub>	
Reporting issues			A	R		R
Determine Issues Requiring Investigation	C <sub>a</sub>	C <sub>i</sub>	A, R		C <sub>a</sub>	
Investigate Issues	C <sub>i</sub>	C <sub>i</sub>	A, R		C <sub>i</sub>	
Oversee and monitor the program		A	R			
Promote the program to all potential Representatives		A	R			

### Legend:

**R** - RESPONSIBLE

**A** - ACCOUNTABLE

**S** - SUPPORT

**C** - CONSULTED

**C<sub>i</sub>** -

**C<sub>a</sub>** -

**I** - INFORMED

Person/people who are/will be responsible for implementation of the decision

Individual who has ultimate authority/responsibility to make a decision

Individual who supports process activity

Person/people whose input/opinion is required for the decision

CONSULTED for input

CONSULTED for agreement

Person/people who need to know of the decision

## 11. Revision History

<b>Code Version:</b>	817-04	<b>Effective Date:</b>	14 Jan 26
<b>Policy Owner:</b>	Chris Kiezulas	<b>Replaces Document:</b>	817-03
<b>Summary of Change:</b>			
<ul style="list-style-type: none"> <li>Scope expanded to include job applicants and prior employees.</li> <li>Inserted text under Section 4 (Bad Faith Allegations) and Section 7, Investigation to demonstrate support for the protection of the rights of the accused person</li> <li>New section on Local Legislation Section 9 inserted.</li> <li>Transferred to latest TP-CDC-WW-010 Corporate Policy Template</li> </ul>			

<b>Code Version:</b>	817-03	<b>Effective Date:</b>	05 Oct 22
<b>Policy Owner:</b>	Chris Kiezulas	<b>Replaces Document:</b>	817-02
<b>Summary of Change:</b>			
<ul style="list-style-type: none"> <li>Scope expanded to include third parties.</li> <li>Inserted sections covering investigations and confirming reporting to the Board of Directors.</li> <li>Changed responsibility from GC to CCO for handling reported matters and investigations.</li> <li>Adapted to new CP Template.</li> </ul>			

<b>Code Version:</b>	817-02	<b>Effective Date:</b>	19 Dec 18
<b>Policy Owner:</b>	Marty Mahoney	<b>Replaces Document:</b>	817-01
<b>Responsible Unit:</b>	Corporate	<b>Active Country / Region / Unit:</b>	Worldwide
<b>Summary of Change:</b>			
<ul style="list-style-type: none"> <li>Updated text to provide more clarity.</li> <li>Aligned group names to recent organizational changes.</li> </ul>			

<b>Code Version:</b>	817-01	<b>Effective Date:</b>	01 Jul 14
<b>Policy Owner:</b>	Dennis Barnes	<b>Replaces Document:</b>	N/A
<b>Responsible Unit:</b>	Corporate	<b>Active Country / Region / Unit:</b>	Worldwide
<b>Summary of Change:</b>			
<ul style="list-style-type: none"> <li>New CP.</li> </ul>			

## 12. Planned Deviations

Applicable planned deviations to this Policy may be accessed in the Planned Deviations area of the Controlled Documents Library (CDL).

Location: PMED	Responsible Administrator: CDC Representative
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## 13. Storage

Storage of Original Document	
Location: PMED	Responsible Administrator: CDC Representative

## 14. Signatures (see electronic signature page)

Process Owner Delegate	This CP has been reviewed for internal business requirements by the Process Owner Delegate
Authorization by Senior Leadership Team (SLT)	This CP has been authorized for use by the Policy Owner

## **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.

UserName: Mahoney, Marty (mahonem)  
Title: Chief Compliance Officer & Deputy General Counsel  
Date: Monday, 12 January 2026, 03:02 PM GMT  
Meaning: I have reviewed this document.

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UserName: Crowley, Mike (crowlem)  
Title: Chief Administrative Officer & General Counsel  
Date: Monday, 12 January 2026, 03:49 PM GMT  
Meaning: I authorize this document.

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