

# CP 820-02.a

## Gift and Hospitality Policy

### Corporate Policy

## 1. Scope

This Policy applies to Parexel, its subsidiaries and affiliates, their directors, officers, employees, as well as all contractors, agency workers, and third parties conducting business on behalf of Parexel (“Covered Persons”).

## 2. Policy Statement

This Policy applies to Gifts and Hospitality exchanged between Parexel Covered Persons and non-Parexel Covered Persons, including customers, suppliers and other third parties. Gifts and Hospitality must comply with all requirements within this Policy, our Code of Conduct, as well as all local laws, regulations, and industry codes governing gifts and hospitality.

Where local laws, regulations, industry codes, or customer or supplier policies impose more stringent requirements, you must always comply with the more restrictive obligation.

## 3. Definitions

A **Gift** means anything of value given or received that is not paid for by the recipient. Gifts include, but are not limited to: food, clothing, floral arrangements, gift cards, gift baskets, wine, artwork, raffle or lottery prizes, and registration for conferences or seminars not sponsored by Parexel.

**Hospitality** includes, but is not limited to, any form of food, drink, accommodation, travel or entertainment.

**Healthcare Professional (HCP)** is someone in the healthcare field who:

- Directly interacts with patients.
- Has a role in patient care, diagnosis, or treatment
- Has influence over the administration, recommendation, purchase, prescribing, supply, or approval of pharmaceutical or device products.

HCPs include, but are not limited to:

- Physicians, pharmacists, radiologists, physiotherapists, technicians, nurses, dentists.

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**parexel.**

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- Medical students.
- Hospital, clinic, and medical office administrators.
- Government Officials who are employed by, or acting on behalf of, a hospital/institution owned or controlled by a government body such as a public hospital or university.
- Payers
- Public officials who participate in public health or social security policies and/or have authority to rule in health-related matters.

Even if some HCPs are not considered Government Officials in your country there are usually special local rules, regulations and Codes related to the relationship between industry and HCPs and you must always comply with the more restrictive obligation.

**Government Official (GO)** means anyone who is:

- A government employee or official of a government, agency/department of a government (e.g., custom's official or regulatory authority).
- An employee of a government-controlled company (e.g., hospital, bank or utility).
- A political party official or a candidate for political office.
- An employee of a public international organization (e.g., United Nations, World Bank or World Health Organization).

## 4. Gifts and Hospitality between Parexel Employees are Permitted

This Policy does not apply to Gifts or Hospitality between Parexel employees. However, any Gifts or Hospitality exchanged between employees must comply with CP 902 Global Travel and Expense Policy and any other Parexel policies that may apply.

## 5. Prohibited Gifts and Hospitality

Gifts and Hospitality of any kind to or from any Governmental Official or their family are never permitted.

Gifts to or from HCPs, their staff, or family are also prohibited, even if requested by a customer.

Regulations, industry standards, and codes governing HCP interactions are complex and vary country by country. In addition, in many countries HCPs are considered Government Officials subject to additional special rules and regulations. Limited exceptions to this prohibition may be requested by obtaining **pre-approval** from Parexel's Chief Compliance Officer by emailing your request to [Compliance@Parexel.com](mailto:Compliance@Parexel.com). An example requiring pre-approval would be business meals during a site visit or flowers to an investigator or study coordinator for a bereavement, etc. Any Hospitality to an HCP must also comply with UP-LRM-WW-005: Interactions with Healthcare Professionals.

## 6. Hospitality for HCPs

Special care is required when dealing with HCPs. Regulations, industry standards and codes governing HCP interactions are complex and vary country by country. In addition, in many countries HCPs are considered government officials subject to additional special rules and regulations.

You must follow the rules below when providing hospitality to HCPs or their staff.

- Entertainment of any kind to HCPs is prohibited (e.g., sporting event tickets, golf, concerts).
- Business meals are permissible provided they comply with Section 7 of this policy.
- All provided hospitality must also comply with UP-LRM-WW-005 Interactions with Healthcare Professionals.

## 7. Business-to-Business Gifts

The following rules must be followed when providing any to business gifts that do not involve HCPs, their staff members, or Government Officials:

- Giving or receiving of cash is always prohibited.
- Gifts must be occasional and related to an event or occurrence (e.g., holiday, birthday, bereavement, etc.). A series of small gifts is not permitted.
- The giving or receipt of a Gift must not appear unethical or potentially embarrass or harm Parexel's reputation if the circumstances became known to the public.
- All Gifts given or received must comply with customer or supplier Gifts and Hospitality policies.
- Requesting a Gift from any customer, prospective customer or supplier is not allowed.
- The Gift must not be intended to or appear to influence business decisions nor be given at an inappropriate time, (e.g., during negotiations, in advance of the issuing of an opinion, the awarding of a contract or during the procurement process.)
- You must report any instance when you have been asked by a customer, prospective customer, or supplier for a Gift to [Compliance@parexel.com](mailto:Compliance@parexel.com).

Any colleague who receives or is offered a Gift that does not fit within the above guidelines or meets the below criteria must report it or obtain pre-approval at [Compliance@parexel.com](mailto:Compliance@parexel.com) per the below (or equivalent in local currency) thresholds:

- **Pre-Approval** by Parexel's Chief Compliance Officer **is required** if:
  - The Gift does not comply with the business-to-business gifting rules above.
  - The value of a single Gift is more than \$250.
  - Multiple Gifts are given/received within a 12-month period that in total are more than \$500 in value.
- **Report it if:**
  - The value of a single gift received is more than \$100
  - Multiple gifts are given/received within a 12-month period that in combination are more than \$250

All reported and pre-approved Gifts (given and received) will be recorded in the Parexel Gift Register maintained by Compliance.

## 8. Business Meals and Other Hospitality

Includes any food, drink, entertainment, or other Hospitality intended to develop or maintain our business relationships. You may host, accept, or attend normal and customary business meals and other Hospitality provided that you remember

- Hospitality to or from Government Officials are prohibited.
- All forms of entertainment to or from HCPs are prohibited.
- All meals and other Hospitality are legitimate, reasonable, and modest by local standards and have a valid business reason.
- HCP meals and other Hospitality comply with the local/regional limits on value of meals and other rules that may be provided by our client healthcare companies. Refer to UP-LRM-WW-003 Rules on Interactions with Healthcare Professionals, for detailed information.
- The host and receiver are both present at the business meal or event.
- If a Parexel Representative's spouse or other guest(s) attends a business meal or other Hospitality when spouse and guest attendance are not essential to the event, the Representative bringing the

spouse or guest is expected to pay for any expenses related to their attendance. Spouses or guests may not attend meals attended by HCPs.

- The venue and cost of the meal or other Hospitality is reasonable, lawful, and consistent with ethical business practices. The venue and cost must not be considered by reasonable standards to be lavish, extravagant, excessive, inappropriate or have the potential to embarrass Parexel or damage our reputation. You should refrain from participating in business meals or other Hospitality that is excessive, of a questionable nature, frequent or extensive as to raise any question of impropriety.
- Questions as to reasonableness should be addressed in advance of the business meal or hospitality to the Compliance Department at [compliance@parexel.com](mailto:compliance@parexel.com).

## 9. Customer and Supplier Events (Seminars, Trainings or Education)

Covered Persons may attend industry or trade association meetings, educational seminars, training, or other events (collectively "Event") sponsored by a third-party having business dealings with Parexel, such as an investor, customer, prospective customer or supplier.

- Registration fee waivers may be accepted, provided they are reasonable in value.
- The Event must not be intended to influence nor appear to influence any business decision by, or in favor of Parexel.
- Travel and lodging related to the Event must be paid for by Parexel, subject to CP 902: Global Travel and Expense Policy.
- Reasonable meals and other Hospitality may be paid for and hosted by the sponsor, or a participating sponsor/supplier of the Non-Parexel Event, provided that they occur during the Non-Parexel Event.
- Meals and hospitality must also comply with Section 8 of this Policy.

## 10. Exceptions to Policy

Any requests for exceptions to this Policy must be approved in advance in writing by Parexel's Chief Compliance Officer or their designee by contacting [Compliance@Parexel.com](mailto:Compliance@Parexel.com).

## 11. Violations

Violation of this Policy will subject an individual to disciplinary action, up to and including termination of employment or termination of the business relationship.

All Covered Persons must report any potential violation of this Policy regardless of who is involved or how you become aware of it. You should report the potential violation to the Compliance team at [Compliance@Parexel.com](mailto:Compliance@Parexel.com) or using the Ethics Hotline at [www.Parexel.ethicspoint.com](http://www.Parexel.ethicspoint.com).

## 12. RASCI Chart

	Chief Compliance Officer/deputy	Employee/ Representative
Creation and Updating of Policy	A, R	
Communication of Policy	A, R	
Reporting violations of Policy		R
Investigating Reports of Violations	A, R	Ci
Granting exceptions to Policy	A, R	

**Legend:**

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

### 13. Referenced Documents

Document Number	Document Title
N/A	<a href="#">Code of Conduct</a>
<a href="#">CP 902</a>	<a href="#">Global Travel and Expense Policy</a>
<a href="#">UP-LRM-WW-005</a>	<a href="#">Interactions with Healthcare Professionals</a>

### 14. Revision History

<b>Code Version:</b>	CP 820-02.a	<b>Effective Date:</b>	19 Apr 23
<b>Policy Owner:</b>	Chris Kiezulas	<b>Replaces Document:</b>	CP 820-02
<b>Responsible Unit:</b>	Corporate	<b>Active Country / Region / Unit:</b>	Worldwide
<b>Summary of Key Changes:</b>			
<ul style="list-style-type: none"> <li>Clarified a paragraph in section 7.</li> </ul>			
<b>Associated Documents:</b>			
New	None		
Updated (Changed)	None		
Retracted (Removed)	None		
Obsolete (Replaced)	None		

<b>Code Version:</b>	CP 820-02	<b>Effective Date:</b>	29 Mar 23
<b>Policy Owner:</b>	Chris Kiezulas	<b>Replaces Document:</b>	CP 820-01
<b>Responsible Unit:</b>	Corporate	<b>Active Country / Region / Unit:</b>	Worldwide
<b>Summary of Key Changes:</b>			
<ul style="list-style-type: none"> <li>Reformatted, reworded to improve comprehension and clarity, including replacing 'nominal' with 'low' value and clarifying that 'branded' is Parexel/client/supplier brand names</li> <li>Inserted reference to the Gift Register</li> <li>Inserted reference to value of limits on gifts given or received and what must be reported or authorized</li> <li>Title of policy changed from Gift &amp; Entertainment to Gift &amp; Hospitality</li> <li>Added reference to new UP-LRM-WW-005 Interactions with Healthcare Professionals</li> <li>Adapted to new CP template</li> </ul>			
<b>Associated Documents:</b>			
New	None		
Updated (Changed)	None		
Retracted (Removed)	None		
Obsolete (Replaced)	None		

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<b>Code Version:</b>	CP 820-01	<b>Effective Date:</b>	13 Jun 18
<b>Policy Owner:</b>	Marty Mahoney	<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 Policy</li> </ul>			
<b>Associated Documents:</b>			
New	None		
Updated (Changed)	None		
Retracted (Removed)	None		
Obsolete (Replaced)	None		

## 15. Deviations

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

<b>Location: PMED</b>	Responsible Administrator: BPM Representative
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## 16. Storage

<b>Storage of Original Document</b>	
<b>Location: PMED</b>	Responsible Administrator: BPM Representative

## 17. Signatures

<b>Technical Content Approval</b>	<b>Signatory</b>
	Shailaja Mahagaonkar Director & Quality Documents Committee Chair, Business Process Management

<b>Legal &amp; Risk Management Approval</b>	<b>Signatory</b>
	Mike Crowley Executive Vice President, Chief Administrative Officer and General Counsel

<b>Authorization by CEO</b>	<b>Signatory</b>
	Jamie Macdonald Chief Executive Officer

## PAREXEL International Electronic Signature Page

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