



# Supplier Code of Conduct



## >>> Contents

- I. Introduction
- II. Business Integrity
- III. Labor and Human Rights
- IV. Environment, Health and Safety Practices
- V. Management Systems & Transparency
- IX. Speaking Up and Ethics Hotline



In order to achieve this, we need to ensure compliance with our Core Values from all company representatives, including our suppliers. Parexel's supplier Code of Conduct is designed to ensure that our Core Values are understood and adhered to by our suppliers and to help us maintain the highest ethical standards. We require that our suppliers strive to achieve best practices to create a sustainable work environment for years to come.

Thank you for supporting and maintaining the legacy of integrity we have created at Parexel.

Sincerely,

**Peyton Howell**  
*Chief Executive Officer*

*With Heart*™

What we do, we do *With Heart*™!

## »»» Introduction

Parexel believes that a strong relationship with our suppliers is critical to ensuring our company's success. This supplier Code of Conduct (Code) communicates our requirements to our suppliers. This will ensure that anyone who works for us and our customers shares our values and works to the highest ethical standards.

## »»» Expectations

Ethical business conduct is everyone's responsibility. This Code is the foundation of our relationship with our suppliers, creating a mutual understanding of our company's Core Values and beliefs and ensuring consistent compliance from all of our suppliers.

This Code sets forth the principles and requirements for establishing and maintaining a business relationship with Parexel. Parexel reserves the right to monitor suppliers' ongoing compliance with these principles and requirements.

Suppliers are responsible for ensuring that you and your employees understand and comply with the principles of this code and that third parties you engage also apply the same or substantially similar principles.

## »»» Scope

This Code applies to any company or person who provides goods or services to Parexel. We expect that you read and understand this Code and ensure that your code is substantially in alignment with this Code. If not, you must ensure that anyone who works on behalf of Parexel understands and complies with this Code.

Parexel is committed to complying with the laws of the countries in which we operate. Laws and regulations are complex and vary from country to country. Suppliers must comply with the laws and regulations in each country where you conduct business. When working across multiple countries, you must comply with the more restrictive requirements.

This Code does not provide the answer to every situation or question you may face. You have a responsibility to use good judgment, to comply with the spirit of the Code and to seek help if you have questions or concerns. If the right course of action is not clear, consult Parexel's Global Compliance Department. You can email us at [Compliance@Parexel.com](mailto:Compliance@Parexel.com) for guidance.



## Business Integrity

We hold all of our suppliers to the highest ethical standards and expect them to conduct business honestly and ethically. This means doing the right thing and complying with applicable laws and regulations.

### **Adherence to Applicable Laws and Regulations**

Suppliers must comply with all applicable laws, rules, regulations and industry standards of the countries in which they operate, applicable U.S. laws, as well as this Code.

### **Quality Requirements**

Suppliers will meet contractually agreed quality requirements and applicable regulatory authority requirements to include: Good Laboratory Practices (GLP), Good Manufacturing Practices (GMP), Good Distribution Practices (GDP), Good Pharmacovigilance Practices (GPhVP), Good Research Practices, Good Clinical Practices (GCP), and Good Documentation Practices (GDoCP).

### **Anti-Bribery and Anti-Corruption**

Corruption in any form is strictly prohibited. There are many forms of corruption, including fraud, bribery, kickbacks, facilitation payments, and extortion. Corruption may involve cash payments or providing anything of value.

Suppliers must not, either directly or indirectly, pay, offer, promise, ask for, accept, or agree to accept any bribe or kickbacks to or from any person, including government or political party officials, officials of international organizations, candidates for public office, or representatives of other businesses or persons acting on behalf of any of the foregoing, to retain or gain a commercial advantage—or even appear to do so.

### **Fraud**

Suppliers must conduct business honestly. Suppliers must not engage in any kind of fraud against or for the benefit of Parexel, business partners, customers, or government entities.

### **Government Officials**

Parexel prohibits suppliers or any of its employees, agents, officers or other members of its management, contractors or subcontractors from being officials, officers, agents, or representatives of any government or political party or international organization where they may be in positions of official government authority able to use that position to improperly assist or aid Parexel or its customers to obtain or maintain business or obtain a business advantage. Facilitation payments, either directly or indirectly, are prohibited regardless of their value.

### **Accuracy of Business Records**

Suppliers must maintain up-to-date books and records, including proper accounting for all payments and expenses made on behalf of or from funds provided by Parexel, to demonstrate compliance with applicable laws and regulations and Generally Accepted Accounting Principles. Suppliers must have accounting and financial internal controls to ensure records are accurate and complete in all material respects.

## Gifts and Hospitality

In the normal course of business there may be occasions that involve the giving or receiving of infrequent, nominal value, business-related entertainment or gifts. The following guidelines govern the giving or acceptance of entertainment and gifts to or from any person or organization associated with Parexel.

Parexel suppliers may offer or accept entertainment only when it is permitted by local laws and codes, is infrequent, of customary and reasonable value, and not intended to influence decision-making or obtain an unfair advantage.

- Permissible gifts include items of nominal value (e.g. branded items); and
- Perishable items of reasonable value (e.g. food, candy or flowers).

Business meals attended by both supplier and Parexel representative(s) are permissible if they are modest, infrequent, not excessive or lavish in nature, are for appropriate business purposes (e.g. to promote business relations), and do not violate applicable laws, regulations or codes.

Any gifts, entertainment or hospitality provided must not be intended to influence decision-making or obtain unfair advantage, and must not create, or be perceived to create, a conflict of interest with Parexel's business interests.

Hospitality, gifts and entertainment in the contract 'pre-award' or negotiating period, other than permissible business meals, are not permitted.

Except as permitted above, suppliers must not offer, and Parexel colleagues (and members of their immediate family) must not accept or solicit, directly or indirectly, from any supplier, current or potential, any gifts, including but not limited to the following:

- Any entertainment or gift in excess of \$150\*
- Cash payments
- Cash equivalents (e.g. gift certificates/cards, vouchers, checks, lottery tickets)
- Travel and accommodations
- Vacations
- Services / Favors
- Job opportunities
- Loans
- Discounts that are not available to all Parexel colleagues

Gifts, business meals, or entertainment, of any value, must never be offered to or from any government official or their associates. Special care is required when dealing with Healthcare Professionals (HCPs). In many countries, HCPs are government officials subject to special rules and regulations. Gifts and entertainment to or from HCPs are not permitted. Business meals for HCPs may be permissible provided they have been approved by Parexel in advance.

Questions regarding permissible gifts, entertainment, or hospitality can be addressed to [Compliance@parexel.com](mailto:Compliance@parexel.com) or to your Parexel Procurement contact.

### **Sanctions**

Suppliers must not engage at any time, directly or indirectly, with any entities or individuals in any sanctioned country/region or on any sanction lists maintained by the U.S., E.U., and UK (e.g. OFAC SDN List, etc.) or those of any countries where services or goods are provided. Suppliers must have appropriate due diligence policies and procedures in place that ensure they do not hire, engage, or work with any country, individual, or entity on any applicable sanctions list.

### **Trade Compliance**

Suppliers must comply with all applicable laws and regulations regarding import and export controls, licensing, sanctions, denied parties, embargoes, anti-boycotts and other trade restrictions that have been approved by recognized national and international authorities. Each country may have different requirements for clearing goods and for keeping records. Suppliers must maintain complete and accurate import/export records.

### **Conflicts of Interest**

Suppliers are responsible for avoiding situations that present, or create the appearance of, a conflict between their interests and their obligations to Parexel and our obligations to our business partners.

If a supplier becomes aware of any actual, apparent or potential conflict of interest between the supplier's interest, duties, obligations or activities, including that of an individual employee, Parexel must be notified immediately.

### **Fair Competition and Antitrust**

We believe that fair competition is in everyone's best interest. We require suppliers to abide by all global fair competition and anti-trust laws and regulations and to compete fairly.

### **Confidential Information**

Confidentiality is crucial to Parexel and our customers. Suppliers shall have processes in place to ensure that the confidentiality of all information is guaranteed by all suppliers and their representatives. Approved confidentiality agreements must be entered into by supplier if confidential information is to be shared. Sharing of such information to authorized recipients must only be on a 'need to know' basis. All other sharing of confidential information is prohibited.

### **Protection and Use of Information**

In order to conduct day-to-day business with Parexel, supplier may be given access to Parexel's or our customers' confidential information, including intellectual property, study data and documents, and personal information. Personal information means any information relating to an identifiable individual person.

Suppliers shall process Parexel's and our customers' personal data solely in accordance with Parexel's and our customers' instructions. Supplier must not use any personal data for their own purposes.

Suppliers must have adequate data privacy and security measures to ensure that confidential and personal information is protected and remains confidential and must only use such information as is appropriate for the delivery of goods and services to Parexel. Suppliers must not disclose this information or transfer it unless given written permission from Parexel. Suppliers must comply with all applicable data privacy laws and regulations.

### **Cybersecurity and Data Protection**

Suppliers shall implement and maintain robust cybersecurity and data protection practices that align with recognized industry standards, including but not limited to ISO/IEC 27001 and the NIST Cybersecurity Framework. These practices must ensure the confidentiality, integrity, and availability of all systems, data, and digital assets associated with services provided to Parexel. Suppliers are required to deploy appropriate technical and organizational safeguards, such as encryption of data at rest and in transit, multi-factor authentication, role-based access controls, regular

vulnerability assessments, and comprehensive incident response protocols. Additionally, suppliers must manage third-party risks by ensuring that any subcontractors or vendors with access to Parexel data adhere to equivalent security standards. In the event of a data breach or cybersecurity incident affecting Parexel-related information, suppliers must notify Parexel within 24 hours of discovery or confirmation of an incident and provide a detailed incident update/report outlining the scope, impact, and remediation actions taken, unless otherwise agreed. Suppliers must also comply with all applicable data protection laws and regulations, including HIPAA, GDPR, and other relevant regional legislation. Parexel reserves the right to audit supplier cybersecurity practices and request documentation to verify compliance.

### **Data Privacy**

Protect the privacy and personal information of individuals. Respect individuals' rights to privacy, handle personal information responsibly, and take necessary measures to safeguard sensitive data. Ensure purposeful collection, use, disclosure, and retention of company-related data and implement an appropriate level of data security. Comply with all applicable data protection and privacy laws and regulations in the jurisdictions in which you operate. This may include the General Data Protection Regulation (GDPR) in the European Union, or other relevant local laws. You are responsible for reporting any violation of your data protection and privacy obligations to Parexel within 24 hours of discovery, unless otherwise agreed.





### **Intellectual Property**

Suppliers shall respect Parexel's and our customers' intellectual property rights, including processes, information, copyrights, trademarks, patents, in-house developed software, trade secrets, decision rights, logos, and brands and know-how. Suppliers are required to take the necessary precautions to safeguard any knowledge they develop or possess on behalf of Parexel.

### **Insider Trading**

Supplier may be given access to material or non-public information about Parexel, our customers and other companies that we do business with. Material information is information that a reasonable investor would consider important to a decision to buy, hold or sell stock or other securities and which could therefore reasonably affect the price of stock or other securities. This is sometimes known as "insider information."

Suppliers, your employees and representatives must not buy or sell securities in your own account or any account over which you exercise control (alone or with others), when you are in possession of non-public, material information associated with stock or other securities. In addition, you may not pass along any non-public, material information or advise anyone to buy or sell securities while in possession of this non-public, material information.

### **Political Contributions**

All political contributions must be made in compliance with applicable laws, regulations and industry standards. Suppliers are prohibited from giving any political support (e.g., financial or resources) on behalf of Parexel or our customers.

### **Animal Welfare**

If applicable, suppliers involved in research or testing using animals shall ensure all animals are treated humanely.



## >>> Definitions

**Bribery** is the offering, giving, receiving, asking for or promising anything of value to, or from, another person to obtain an improper advantage or induce a favorable decision or action.

**Corruption** generally refers to the abuse of power or position for personal gain or to obtain a business advantage.

**Anything of Value** typically means any form of money or non-monetary inducement such as gifts, gift cards, preferential treatment, tickets to events, vouchers, travel or entertainment, goods or services, donations, privileges, or favors (employment opportunities, educational opportunities, etc.).

**Facilitation Payment** is when a small amount of money, goods, or anything else of value is given to a government official to speed up a routine government service (e.g. increase the speed in processing a permit or visa or to release goods from customs, etc.).

**Fraud** means intentionally concealing, omitting or falsifying information to gain an unlawful or unfair advantage. Even the appearance of fraud must be avoided.

**A Gift** is anything of value given or received that is not paid for by the recipient. Gifts include, but are not limited to, food, floral arrangements, gift baskets, wine, artwork, music CDs, raffle or lottery prizes, travel or lodging, tickets to sporting events or concerts, other forms of entertainment, and favors such as job opportunities (to you or an immediate family member).

## 》》》 Labor and Human Rights

Suppliers are required to follow all general workplace standards, including those governing hiring, separation, compensation and the treatment of employees. This commitment establishes and ensures a supportive working environment for all employees.

### **Non-Discrimination**

Suppliers shall prohibit discrimination without regard to race and ethnicity, national origin, sex, gender identity, sexual orientation, disability, age, religion, or other difference and comply with the laws in each country in which we do business.

### **Anti-Harassment**

Workers have a right to a workplace free of harassment or discrimination in any form. Parexel requires that its suppliers prohibit all types of harassment including, but not limited to, physical, verbal, visual, psychological, sexual harassment or other conduct of any kind that creates an intimidating, offensive or hostile work environment.

### **Human Rights**

Suppliers must respect human rights and warrant that all employees work on a voluntary basis and must prohibit all forms of human rights abuses, including child labor, forced, involuntary, or indentured labor, slavery, human trafficking and physical punishment.

Suppliers shall encourage and facilitate the reporting of concerns or illegal activities in the workplace and shall promptly investigate any reports received. Suppliers must ensure that employees can report such concerns without fear of retaliation or reprisal of any kind.

### **Wages, Benefits and Working Hours**

Suppliers shall comply with all applicable wage and hour laws and regulations.

### **Diversity**

Suppliers must be committed to building and promoting an environment that is inclusive of all people and their unique abilities, strengths and differences. Inclusion means creating a workplace where people can be themselves regardless of their race and ethnicity, national origin, color, religion, sex, gender identity, sexual orientation, disability, age, or other difference.



## »»» Environmental, Health and Safety Practices

Suppliers must provide their employees with a healthy and safe workplace in compliance with all local and national health and safety regulations and ensure safety management systems are in place to prevent work-related personal injuries.

### **Worker Safety and Protection**

Suppliers must protect employees from chemical, biological and physical hazards, in addition to the prevention of on-site accidents. To help ensure safety, suppliers must provide employees with the necessary training and protective equipment. Suppliers must maintain records documenting workplace injuries and health and safety trainings.

Suppliers must implement emergency response plans, including evacuation drills, fire detection equipment, and first aid supplies, to ensure the safety of workers.

### **Sustainability**

Parexel seeks to create a sustainable environment and we require our suppliers to do the same. Suppliers must comply with laws regarding environmental practices and should strive to consistently improve their own environmental performance and reduce their environmental footprint.

### **Hazardous Waste**

Suppliers shall manage all hazardous materials capable of posing a threat to health and safety by ensuring all materials are appropriately handled and disposed of safely. Suppliers' employees must be educated and trained on how to handle hazardous materials and protection from hazards.

### **Pollution Prevention**

To promote a sustainable environment, suppliers shall strive to reduce their resource consumption and use, including implementing improvement plans for waste reduction, recycling and water and energy conservation policies.

### **Conflict Minerals**

Conflict minerals, whose obtainment is linked to human rights violations, are prohibited from use by our suppliers. Suppliers must meet the conflict mineral reporting requirements as required by the Dodd-Frank Wall Street Reform and Consumer Protection Act and the Securities and Exchange Commission.

### **Permits and Reporting**

Suppliers shall obtain and maintain all required environmental permits and follow applicable reporting requirements.

## >>> Management Systems and Transparency

Suppliers are required to have appropriate and effective management systems to enable adherence to this Code.

### **Commitment and Accountability**

Suppliers will demonstrate commitment to the principles contained within this Code by allocating appropriate resources and maintaining adequate documentation to demonstrate conformance with the principles and values within this Code and compliance with all laws, regulations and standards.

### **Subcontractors**

Parexel must be informed in writing of all subcontractors involved in providing goods or services to Parexel. Suppliers will only accept ethical and lawful behavior from all persons or entities who may act on your behalf to perform services for Parexel. This Code must flow down to your sub-contractor contracts.

### **Risk Management**

Suppliers shall have a risk management plan to identify, assess, and manage risks in all areas on an ongoing basis. This includes assessing risks associated with persons or entities who act for you.

### **Business Continuity and Disaster Recovery**

Suppliers shall implement and maintain Business Continuity and Disaster Recovery plans for all operations supporting any goods or services provided to Parexel or our customers. Business Continuity Plans and Disaster Recovery plans must be tested regularly.

### **Audits and Inspection**

Parexel reserves the right to audit suppliers upon reasonable notice to ensure compliance with the standards in this Code. Suppliers shall provide Parexel with necessary information and allow Parexel or its representative access to the suppliers' relevant premises and documentation in order to verify that the suppliers, their employees and subcontractors comply with this Code. Findings inconsistent with this Code must be promptly corrected. Suppliers must fully investigate any non-compliances and incidents and take corrective and preventative actions, as needed.

### **Training & Competency**

Vendors shall have a training program that achieves an appropriate level of knowledge, skills and abilities in management and workers to address these expectations. Vendors without an adequate training program will be required to complete Parexel's Anti-Bribery and Anti-Corruption training.







## >>> Speaking Up and Ethics Hotline

### **Ethics Hotline**

Parexel encourages individuals to report any questions or concerns, including concerns regarding violations of this Code, via [www.parexel.ethicspoint.com](http://www.parexel.ethicspoint.com) to file a web-based report. These reports can be filed from within or outside the Parexel network.

Suspected violations of this supplier Code of Conduct can also be reported to [compliance@parexel.com](mailto:compliance@parexel.com).

### **No Retaliation**

Parexel prohibits and does not tolerate any retaliation taken against an individual who, in good faith, has reported a suspected violation of this supplier Code of Conduct.

When a potential violation has been reported, Parexel will investigate the report to the fullest extent possible and respond appropriately.