

CP 807-07

Anti-Bribery and Anti-Corruption

Corporate Policy

1. Scope

This Policy applies to Parexel representatives including all directors, officers, employees, and contractors of Parexel International and its affiliates (“Parexel”).

2. Policy Statement

Parexel does not tolerate bribery or corruption in any form.

This Policy addresses a variety of circumstances in which bribery or corruption issues may arise. We also clearly state our standards prohibiting any form of bribery or corruption in our Code of Conduct, and in our policies on Gift and Entertainment and Rules for Interactions with Healthcare Professionals. Our Supplier Code of Conduct confirms that the same standards apply to and are required of companies engaged on behalf of Parexel.

3. Anti-Bribery and Anti-Corruption

Parexel representatives must not commit any form of bribery or corruption and we must not use third parties such as consultants, suppliers, or other business partners to commit acts of bribery or corruption.

Parexel does not distinguish between public officials and private persons or businesses in so far as bribery or corruption is concerned. Any form of bribery or corruption is prohibited, regardless of the status of the recipient.

Always use good judgment in your business decisions. Before offering, giving, promising, or receiving anything of value ask yourself: Is it legal? Is it ethical? Does it comply with our Code of Conduct and this Policy? If you have doubts, ask for advice or guidance at Compliance@parexel.com.

Definitions

Bribery is defined as offering, giving, promising, receiving, or soliciting (or authorizing someone else to do so) of anything of value to, or from, another person to obtain an improper advantage or induce a favorable decision.

Corruption 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 incentives such as gifts, gift cards, preferential treatment, tickets to events, vouchers, travel or entertainment, goods or services, donations, privileges, favors (employment opportunities, educational opportunities, etc.).

4. Gifts & Entertainment

This policy is not intended to prohibit the following practices provided they are appropriate, proportionate, and are properly recorded and in line with Parexel's CP 820: Gift & Entertainment Policy:

- normal meals and hospitality.
- nominal value, branded gifts.
- fast tracking a process which is permitted only if a government agency offers expediting services according to publicly available or listed rates.

5. Facilitation Payments

Parexel prohibits the offering, or authorizing the offer, of a facilitation payment irrespective of whether the law in that country permits facilitation payments.

Definition

Facilitation Payments are payments to a government official to expedite the performance of a routine, non-discretionary governmental action. These payments are typically intended to influence the timing of a public official's actions such as, payments to expedite the issuance of a visa or clearing goods through customs. Payments for expedited services (e.g., expedited via processing) are permitted only if a government agency offers expediting services according to publicly available rates.

6. Accounting – Books, Records & Internal Controls

Parexel must prepare and maintain books and records that accurately and in reasonable detail document the source and use of Parexel's expenses, revenues, and assets. All relevant financial controls and approval procedures must be followed. Cash payments should be avoided.

If any employee knows or believes that a payment has been or will be recorded improperly or in any manner that conceals, distorts, or otherwise misrepresents the true and accurate nature of the transaction, the employee must immediately report suspected or known violations in accordance with section 12 Reporting Misconduct.

7. Healthcare Professionals & Government Officials

Healthcare Professionals (HCPs) working in government owned hospitals are considered government officials. However, in some countries HCPs are public officials irrespective of whether they are working at a government institution. In almost all countries special rules apply to our relationships with HCPs; please refer to the Parexel policy '[Rules on Interactions with Healthcare Professionals](#)' for more information.

Any relationship with government or public officials must be in strict compliance with the rules, regulations, and codes to which they are subject (i.e., local, state, and national laws, their employer's policies, etc.). Any benefit conveyed to a public official must be fully transparent, properly documented and accounted for, and legal under this policy and under local/regulations and codes.

Remember - you may never give any kind of gift, or item of value, whether personal, culturally accepted, branded or unbranded, to a government official or an HCP.

Examples of prohibited actions are:

- Compensation of an HCP for services in excess of fair market value.
- Allowing a trial site to retain sponsor equipment at the end of the trial without proper approval and documentation.

8. Interacting with Third Parties

Parexel and our representatives are liable under anti-bribery laws for the acts of Suppliers that act on our behalf. Parexel has implemented policies and procedures to ensure that it forms business relationships with reputable and qualified partners and representatives who will comply with applicable anti-bribery laws.

These policies and procedures require that compliance due diligence screening is conducted, and that certain contractual language is included in agreements with third parties.

9. Mergers, Acquisitions & Joint Ventures

Parexel will carry out robust due diligence screening on entities that may be the subject of merger, acquisition, or a joint venture. A risk mitigation plan will be developed to address any identified bribery or corruption risks.

10. Lobbying, Political Contributions, and Charitable Donations

Parexel has established policies on activities associated with any type of lobbying, political contributions, or charitable donations. Please refer to the following policies for additional information:

- Code of Conduct (political and charitable donations).
- CP 810: Lobbying Policy.

11. Training

All new Parexel employees and contractors must complete anti-bribery and anti-corruption training within the first three months of employment and annually thereafter. Compliance with this requirement will be tracked by the Chief Compliance Officer and will be reported quarterly to the Executive Leadership Team.

12. Reporting Misconduct

Employees are obligated to ask questions, seek guidance and speak up if they observe or suspect that something is illegal, inappropriate, or violates any anti-bribery or anti-corruption laws, this policy, or our Code of Conduct.

Employees and third parties can refer to CP 817: The “Speak Up” Program, which outlines a structured approach for asking questions, reporting a concern or misconduct, as well how to follow up on a submitted report. The “Speak Up” Program includes our Ethics Hotline which enables you to submit information confidentially, with the option to report it anonymously.

13. Violations

Violation of this policy will subject an individual to internal disciplinary action, up to and including termination of employment. Parexel also reserves the right to and may be required to refer matters to applicable law enforcement authorities.

14. RASCI Chart

	GC	CCO	Representatives	CEO
Creation and maintenance of Policy	A	R		
Communication of Policy	A	R		
Completing Anti-Bribery and Anti-Corruption Training		A	R	
Reporting Violations	I	A	R	I
Investigating Reports of Violations	A	R	C _i	C _i

CCO – Chief Compliance Officer; CEO – Chief Executive Officer; GC – General Counsel

Representatives include employees, officers and directors and contractors

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
S - SUPPORT	Individual who supports process activity
C - CONSULTED	Person/people whose input/opinion is required for the decision
C_i -	CONSULTED for input
C_a -	CONSULTED for agreement
I - INFORMED	Person/people who need to know of the decision

15. Referenced Documents

Document Number	Document Title
CP 810	Lobbying Policy
CP 817	The “Speak Up” Program
CP 820	Gift and Entertainment Policy

16. Revision History

Code Version:	807-07	Effective Date:	08 Oct 21								
Policy Owner:	Mike Crowley	Replaces Document:	807-06								
Responsible Unit:	Corporate	Active Country / Region / Unit:	Worldwide								
Summary of Change:											
<ul style="list-style-type: none"> • Changed title from Compliance with Anti-Bribery Laws to Anti-Bribery and Anti-Corruption. • Transferred content to the new CP template. • Alignment with new Code of Conduct. • Clear guidelines of expectations regarding what is prohibited by the Policy. • Expanded scope of bribery or corruption with any individual or entity versus just foreign officials. • Included references to CP 820 Gift and Entertainment Policy. • Training reported to ELT and not the AFC Chair. • Eliminated Section 3 – Background. • General rewording to make it more user-friendly. 											
Associated Documents:											
<table border="1"> <tr> <td>New</td> <td>None</td> </tr> <tr> <td>Updated (Changed)</td> <td>None</td> </tr> <tr> <td>Retracted (Removed)</td> <td>None</td> </tr> <tr> <td>Obsolete (Replaced)</td> <td>None</td> </tr> </table>				New	None	Updated (Changed)	None	Retracted (Removed)	None	Obsolete (Replaced)	None
New	None										
Updated (Changed)	None										
Retracted (Removed)	None										
Obsolete (Replaced)	None										
Code Version:	807-06	Effective Date:	12 May 17								
Policy Owner:	Chris Kiezulas	Replaces Document:	807-05								
Responsible Unit:	Corporate	Active Country / Region / Unit:	Worldwide								
Summary of Change:											
<ul style="list-style-type: none"> • Reviewed with LRM and made general changes to text to align with Corporate Policy standard templates. 											
Associated Documents:											
<table border="1"> <tr> <td>New</td> <td>None</td> </tr> <tr> <td>Updated (Changed)</td> <td>None</td> </tr> <tr> <td>Retracted (Removed)</td> <td>None</td> </tr> <tr> <td>Obsolete (Replaced)</td> <td>None</td> </tr> </table>				New	None	Updated (Changed)	None	Retracted (Removed)	None	Obsolete (Replaced)	None
New	None										
Updated (Changed)	None										
Retracted (Removed)	None										
Obsolete (Replaced)	None										

CP 807-07: Anti-Bribery and Anti-Corruption

Effective Date: 08 Oct 21

Confidential

Developed from TP-BPM-WW-010; related to SOP-BPM-WW-001

Code Version:	807-05	Effective Date:	30 Mar 16
Policy Owner:	Dennis Barnes	Replaces Document:	807-04
Responsible Unit:	Corporate	Active Country / Region / Unit:	Worldwide

Summary of Change:

- The previous version of the CP was not issued with the updated sections 2 and 3. These sections are now included.

Associated Documents:

New	None
Updated (Changed)	None
Retracted (Removed)	None
Obsolete (Replaced)	None

Code Version:	807-04	Effective Date:	18 Dec 15
Policy Owner:	Brett Davis	Replaces Document:	807-03
Responsible Unit:	Corporate	Active Country / Region / Unit:	Worldwide

Summary of Change:

- Added UK Bribery Act information. New CP format.

Associated Documents:

New	None
Updated (Changed)	None
Retracted (Removed)	None
Obsolete (Replaced)	None

Code Version:	807-03	Effective Date:	31 Jul 13
Policy Owner:	Brett Davis	Replaces Document:	807-02
Responsible Unit:	Corporate	Active Country / Region / Unit:	Worldwide

Summary of Change:

- New CP format. No changes to text.

Associated Documents:

New	None
Updated (Changed)	None
Retracted (Removed)	None
Obsolete (Replaced)	None

Code Version:	807-02	Effective Date:	20 Jul 11
Policy Owner:	Michael Zurcher	Replaces Document:	807-01
Responsible Unit:	Corporate	Active Country / Region / Unit:	Worldwide
Summary of Change:			
<ul style="list-style-type: none"> Sections 2, 4.1 and 4.5 amended in line with review of anti-bribery program. Addition of RACI chart. 			
Associated Documents:			
New	None		
Updated (Changed)	None		
Retracted (Removed)	None		
Obsolete (Replaced)	None		

Code Version:	807-01	Effective Date:	31 Mar 10
Policy Owner:	Michael Zurcher	Replaces Document:	N/A
Responsible Unit:	Corporate	Active Country / Region / Unit:	Worldwide
Summary of Change:			
<ul style="list-style-type: none"> New CP. 			
Associated Documents:			
New	None		
Updated (Changed)	None		
Retracted (Removed)	None		
Obsolete (Replaced)	None		

17. Deviations

Applicable deviations to this Policy may be accessed in the Deviations area of the Controlled Documents Library (CDL).	
Location: PMED	Responsible Administrator: BPM Representative

18. Storage

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

19. Signatures

Technical Content Approval	Signatory
	Annelise de Villiers Senior Director & Quality Documents Committee Chair, Business Process Management

Legal & Risk Management Approval	Signatory
	Mike Crowley Executive Vice President, Chief Administrative Officer and General Counsel

Authorization by CEO	Signatory
	Jamie Macdonald Chief Executive Officer

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