



Code of Conduct





»»» A Company *With Heart*™

At Parexel, conducting business ethically and with the highest standards of integrity is core to our culture and our shared passion to advance world health for the benefit of patients.

We deliver on this commitment through a strong focus on our Core Values – Patients first, Quality, Respect and Empowerment and Accountability – underpinned by our “We Care” guiding principle.

As an organization that keeps our colleagues, Customers and patients at the heart of everything we do, our Code of Conduct reinforces our commitment to upholding our Core Values through our words and actions. Our Code of Conduct speaks not only to what we do, but how we do it. We abide by the intent and purpose, always respecting the spirit of the law, not just the letter of the law; fully integrating the principles of ethics in everything we do, no matter the level of difficulty of the choice confronting us.

Our Code of Conduct is designed to support our colleagues at Parexel as they navigate our daily work in supporting our Customers and bringing new therapies to patients. Each of us is tasked with the responsibility of bringing our Code of Conduct to life by acting with honesty, integrity, fairness and respect.

Our Code of Conduct represents what we stand for and what we believe in, and it demonstrates our commitment to our internal colleagues and to all of our stakeholders. We're committed to saving and enhancing patient lives through new therapies and doing so *With Heart*™.

James H. Hall

Jamie Macdonald
Chief Executive Officer



With Heart™

parexel.

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>>> Doing Business with Integrity

At Parexel we believe in doing what's right by being ethical and honest and acting with respect and responsibility in everything we do. Our Code of Conduct (referred to as the "Code") is the moral compass of our Company and defines the standards by which we work and conduct business. What our colleagues do — and the way in which they do it — matters.

This Code does not provide the answer to every situation or question you may face at work. You have a responsibility to use good judgment, to comply with the Code (including the spirit of the Code), refer to our policies and procedures for additional information, or seek help from your manager, Human Resources, Compliance or any other resources found throughout this Code if you have questions or concerns.

You also have an obligation as an employee of Parexel to report any actual or suspected violations of the Code to a member of the [Compliance team](#) or through the Company Ethics Hotline at www.parexel.ethicspoint.com

»»» Our Core Values

When our values align, there's no limit to what we can achieve.

We Care

Everything we do has the potential to impact patient lives. We show we care by taking our work seriously, demonstrating empathy and acting *With Heart™*.

This is our overarching Guiding Principle that sits above our four core values – Colleagues, Customers, Sites and Patients.

Patients first



Each of us, no matter what we do at Parexel, contributes to the development of a therapy that ultimately will benefit a patient. We take our work personally, we do it with empathy and we're committed to making a difference.

- › We appreciate that patients are people, not numbers or results.
- › We make decisions with an understanding of the patient's point of view.
- › We act with urgency, bringing the right therapies to patients quickly and safely.
- › We protect patient data and privacy as if they were our own.

Quality



From the smallest detail to the largest, we take quality seriously. We focus in on the detail while never losing sight of the big picture to drive the best possible outcomes.

- › We consistently apply our talents to deliver the best results.
- › We embrace new challenges and opportunities with confidence.
- › We take informed risks to innovate and grow.
- › We admit our mistakes and keep our promises.

Respect



We recognize and uphold the importance of all people, how we do things, our quest for innovation and most importantly, our patients.

- › We trust and encourage each other to do our best work.
- › We value different perspectives and cultures.
- › We leverage our colleagues' diverse strengths and expertise.

Empowerment and accountability



We follow our hearts, we do the right thing and we have the courage to own the outcome.

- › We work collaboratively to maximize our collective strengths.
- › We make bold decisions, acting with urgency to deliver the best value to our Customers.
- › We make things as simple and easy as possible.
- › We strive to deliver the highest quality every time.
- › We raise our hand to be part of the solution.



>>> Our Responsibilities

Our core values mean each of us is responsible for enacting the Code of Conduct and for owning the outcome of our actions. No matter the challenge we are facing, we always consider the impact on patients and act in accordance with the highest of ethical standards.

Our Code of Conduct provides the standards and expectations for how we work and conduct business. Ethics and compliance are the foundation of our Company and are essential to our continued success. We are all caretakers of Parexel's reputation. It is not just about the results we achieve but how we achieve them — by conducting business with honesty, integrity, and respect. We all share in the responsibility of reading and understanding the provisions of the Code, ensuring that we adhere to the Code, and promptly raising questions, concerns, and suspected violations to the attention of Company management. In doing so, we will earn and maintain the trust and confidence of our Customers, Suppliers, patients, and regulatory authorities. Thank you for living and demonstrating Parexel's core values every day.

— Marty Mahoney, Chief Compliance Officer
& Deputy General Counsel



Why we have a Code

Parexel has a sophisticated business model providing biopharmaceutical services globally and we work in a highly regulated and competitive environment. Our Customers trust us to conduct their business in ways that meet the highest standards of legal and ethical integrity.

Our Code defines the principles of how Parexel **“Does Business with Integrity.”** These principles are based on the ethical values of honesty, integrity, fairness, respect and responsibility that are critical to our success.

Your Responsibilities

Ethical business conduct is part of everyone’s job. This Code applies to every director, officer, colleague, contractor and agent working on behalf of Parexel. As an individual in one of these roles, you are responsible for understanding and complying with this Code.

Additional Responsibilities for Managers

If you lead, supervise or manage others, you have an additional responsibility to:

Live our Code. Always do business the right way and establish a baseline of excellence for your team.

Lead by Example. Inspire trust and make fair and objective business-based decisions.

Encourage a Culture of Compliance. Recognize and reward ethical behavior.

Set and Communicate Clear Expectations. Help your team understand and apply our Code in their daily work.

Train Team Members. Ensure your team is aware of and completes all required training on the relevant laws, regulations and our Company policies and procedures.

Foster an Open Culture. Make sure team members are comfortable reporting their concerns without fear of retaliation.

Respond promptly. Be receptive and respond promptly to all questions, comments or concerns brought to your attention.

Ensure Suppliers understand and follow our Code.

Ask for help when needed. You won’t always know the answer to employees’ questions. If in doubt, check with your manager, HR, Compliance or any other resources found throughout this Code.

General Expectations

Parexel is committed to complying with the laws of the countries in which we operate and this requirement applies to our colleagues as well. These laws and regulations are complex and vary from country to country. When working across multiple countries, you should comply with the more restrictive requirement. If the right course of action is unclear, please consult with your Line Manager, Human Resources or one of our Compliance Officers for guidance.

Key Principles of our Code

Follow our Code: Read, become familiar with and follow our Code. Use common sense and good judgement when making decisions.

Act with Honesty and Integrity: We must demonstrate honesty and integrity and act in a professional manner in all that we do.

Personal Accountability: We are accountable for all our actions to our Customers, our community, our stakeholders and each other. We never compromise our standards.

Training: Complete all required training relating to the Code and other Company policies.

Ask Questions: If you are unsure about how to proceed in a given situation, seek and receive advice in advance of taking any action.

Speak Up: Be proactive and speak up if you see any potential or actual violations of the Code, Company policies, laws or regulations.

Avoid Conflicts of Interest: Our business decisions are free from conflicting outside influences and are not driven by any personal interest or gain.

Respect Others: We must all act responsibly, be team players, foster an inclusive workplace and treat others with respect and dignity.



>>> Ask Questions and Speak Up

Our core values compel us to ask questions, clarify ambiguous situations and report issues of potential concern. We recognize that by speaking up we are putting the needs of our patients and Customers before our own self-interests, and that is the basis of ethical behavior.

Speak Up

We are an organization with strong values of accountability and integrity. Each of us has an obligation to ask questions, seek guidance and speak up and share our concerns when we make a mistake, or when we observe or suspect that something is illegal, inappropriate or violates this Code, Company policies, laws or regulations.

You are encouraged to speak to your Manager for most matters. They will be able to offer advice or answer most questions.

No Retaliation

Our Company strictly prohibits retaliation, including harassment, discrimination or disciplinary actions against those who have the courage to speak up. Additionally, colleagues and Suppliers who cooperate with investigations that may result from employee reports are protected from retaliation.

Reporting a Concern

If you feel you are unable to report a concern to any of the recommended individuals or resources identified within this Code, you are encouraged to use our [Ethics Hotline](#), which is hosted by a third-party provider. 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 is available 24 hours a day, seven days a week.

We take all concerns seriously and investigate them in a prompt, fair and thorough manner to determine if any law or Company policies have been violated. Information submitted or collected during an investigation will be treated confidentially.

>>> Speak Up FAQs

Q: If one of my team members accidentally violated one of our corporate policies, do I have to hold him/her accountable even if he/she was unaware of the requirement?

A: Everyone is responsible for understanding and following our Code and must be held accountable with appropriate remediation and disciplinary measures taken (if applicable).

Q: If I become aware of a violation of the Code by an employee that I do not manage, am I still required to report the issue?

A: Yes, as an employee you must report any potential violation of the Code regardless of who is involved or how you become aware of it. You should report the potential violation to the Global Compliance team at Compliance@parexel.com or you may also report the potential violation using the Ethics Hotline at www.Parexel.ethicspoint.com.



Ethics Hotline

Access the Ethics Hotline at www.Parexel.ethicspoint.com

Within the Ethics Hotline you may:

- Ask a question
- Report a concern or misconduct
- Follow up on a report by logging into the Ethics Hotline website to find the current status or answer questions that have been posted
- Find Speak-Up FAQs
- Access the following Corporate Policies:
 - [Anti-Bribery Policy](#)
 - [Speak-Up Policy](#)
 - [Insider Trading](#)



Additional Resources

You can also reach out to any of the following:

- [Compliance Officer](#)
- [Legal and Risk Management](#)
- [Your Human Resources Partner](#)

Contact the Ethics Hotline by Phone

A listing of the Ethics Hotline Numbers by country can be found on the Global Compliance [Pulse](#) in the Speak Up Program section.

The phone numbers are found when you click on "Report a Concern" and select your country at www.Parexel.ethicspoint.com

Q: I suspect that a manager at our office might have violated this Code. I don't have proof that anything wrong occurred and I don't want her to get into trouble if she did not do anything wrong. Should I still speak up?

A: Yes, if you suspect that someone has done something that violates our Code, is illegal or unethical, or some other wrongdoing has occurred, then you need to speak up. Neither you nor the manager will get into trouble for reporting something that appears suspicious, if you do it in good faith, even if it turns out the allegation is incorrect. Good faith means the reporter believes the information reported shows misconduct against our policies.

If anyone knowingly makes a false accusation or tells lies about another person's actions, then they will be subject to disciplinary action.

Q: A team member reported a colleague to HR for harassment. His Line Manager who is friendly with the alleged harasser is now excluding him from team meetings and social events. Could that be considered retaliation?

A: Yes, retaliation can be direct, such as an unjustified negative performance evaluation, or indirect, such as this example. Retaliation is any adverse action taken in revenge. Please report the situation to HR or to the resources listed in this Code.

Parexel has a zero-tolerance response to retaliation.


Q: My Line Manager asked me to do something that is against our Code and may be illegal. If I report it, I'm scared that my manager will know it is me.

A: We will not tolerate retaliation and we will take action against anyone who threatens a reporter. Please report your concern to Global Compliance or via the Ethics Hotline, which enables you to report anonymously. We highly encourage you to provide your contact information so that we can contact you if we have any questions or require additional information. This will enable us to conduct a thorough investigation into the matter and allow us to take appropriate action.

Q: I have decided I want to report a suspected violation anonymously. How do I do that?

A: There are two ways in which colleagues can report a suspected violation confidentially and anonymously:

- **Website:** Visit www.Parexel.ethicspoint.com to file a web-based report. These reports can be filed from within or outside the Parexel network.
- **Speak Up Ethics Hotline:** Countries with Parexel operations have their own unique dial-in number allowing colleagues to submit reports in their local language. The phone numbers are found when you click on "Report a Concern" and select your country at www.Parexel.ethicspoint.com. A listing of the Ethics Hotline Numbers by country can also be found on the Global Compliance [Pulse](#) in the Speak Up Program section.



Q: I just reported a suspected violation and requested to remain anonymous. How can I be sure that will happen?

A: Information collected through the Speak Up Ethics Hotline will be kept confidential and anonymous because NAVEX Global, the program administrator, is an experienced provider of confidential reporting services and is contractually required to conceal the identity of the person making the report. Reporting through the website or calling in a report using the local telephone number in the applicable country can be done confidentially and anonymously if the colleague making the report chooses that option.

- **Ethics Hotline Website:** The portal does not identify visitors by screen name or internet address, thus ensuring confidentiality and anonymity.
- **Ethics Hotline:** After you file a report via phone to the Ethics Hotline, an interviewer will type your responses into Parexel's Ethics Hotline website. These reports are as secure, confidential and anonymous as the web-based reports.

Individuals who have submitted a report can log into the Ethics Hotline to view the current status or answer follow-up questions that have been posted by the investigative team.

Q: What information should I provide if I file a report?

A: Both the Ethics Hotline telephone operators and the Ethics Hotline website ask a series of questions designed to collect the relevant facts about the situation. When answering questions, it is important to limit answers to facts. Don't speculate or provide opinions.



>>> Our Commitment to Integrity

Our Guiding Principle, We Care, affirms the strength of our commitment to patients and the knowledge that everything we do has the potential to impact patient lives. We demonstrate our commitment by taking our work seriously, showing empathy by acting *With Heart™* and living up to the ideals of honesty and integrity.



Compliance with Laws and Regulations

Parexel is committed to conducting business honestly and ethically. We act with integrity and comply with applicable laws and regulations. We operate in many diverse environments and our business involves interaction with Customers, Suppliers, healthcare professionals, patients, auditors, inspectors, and government authorities. It's vital to ensure that our colleagues, and those who work on our behalf, understand our responsibilities and operate to the highest ethical standards.

Anti-Bribery & Anti-Corruption

Parexel prohibits corruption. Corruption in any form is strictly prohibited. Corruption generally refers to the abuse of power or position for personal gain or to obtain a business advantage. There are many forms of corruption, including bribery, kickbacks or extortion. Corruption may involve cash payments or providing anything of value.

Parexel prohibits bribery. In almost every country in the world there are anti-bribery and anti-corruption laws or regulations that apply to our business. These laws and regulations prohibit bribing individuals, including government officials, for the purpose of obtaining or retaining business or for directing business to a company or person.

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

"Anything of value" may be in the form of money, gifts, gift cards, preferential treatment, tickets to events, vouchers, travel or entertainment, goods or merchandise, donations, privileges, favors (employment opportunities, educational opportunities, etc.) or services.

Violation of the FCPA, UK Bribery Act and all other anti-bribery laws may result in penalties to Parexel and the individuals involved.

Many countries have laws prohibiting corruption and bribery, for example, the United States Foreign Corrupt Practices Act ("FCPA") prohibits payments for corrupt purposes to foreign (non-U.S.) government officials. This law applies to Parexel and every Parexel colleague, director, officer, contractor and any third parties acting on our behalf, regardless of where they are located, and in any country where Parexel does business. **Healthcare Professionals working in government-owned hospitals are considered government officials.**

A Red Flag is a warning sign of possible illegal or improper conduct that has or may occur.

Check out our Anti-Bribery and Anti-Corruption (ABAC) Red Flag info sheet with examples of the most common red flags associated with bribery and corruption.

Q: What does "anything" of value mean?

A: 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.) or services.

Q: What is a kick-back?

A: A kickback can be a form of negotiated bribery where the seller provides anything of value back to the buyer in exchange for awarding the business to the seller. A common example of an improper kickback is when money is provided by Suppliers for the personal benefit of individuals awarding work to the supplier. Such kickbacks are bribery and are prohibited by Parexel and by law in most countries.

Q: I work in Procurement and I'm friendly with one of our Suppliers. His company has a vacancy and I'd like to ask him to employ my daughter. Is that okay?

A: No. It would appear that you are using your position for personal gain, which is not allowed. It could also be considered a bribe, especially if the Supplier believes or hopes it will help him retain current business or gain future business from Parexel. Remember, favors are benefits in kind and can be considered bribes.



Facilitation Payments

Facilitation Payments are a form of bribery and are prohibited by Parexel. A facilitation payment is when a small amount of money or goods is given to a government official for certain routine government services in order to:

- Speed up the processing of regulatory applications, permits or visas, etc.
- Release goods from customs

All payments to a government entity must include a receipt for each payment and must be recorded appropriately within our financial systems. Payments for expedited services (e.g., expedited visa processing) are permitted only if a government agency offers expediting services according to publicly available rates.

If you are asked for a facilitation payment, contact a member of the Global Compliance team immediately.

Activities or Red Flags to avoid or watch out for:

We must not, either directly or indirectly pay, ask for, or accept a bribe to:

- ✗ Influence regulatory decisions
- ✗ Influence business decisions
- ✗ Obtain or retain business
- ✗ Secure an unfair business advantage

We also must not:

- ✗ Make, offer or promise anything of value to influence a person's actions
- ✗ Pay a bribe through a third party/supplier – because it is the same as doing it yourself

Fraud

We must never compromise our ethical standards by committing fraud.

You must not engage in any kind of fraud against or for the benefit of Parexel, business partners, Customers or government entities. Fraud involves intentionally concealing, omitting or falsifying information to gain an unlawful or unfair advantage. Even the appearance of fraud must be avoided.

Anti-Boycotting

U.S. Federal anti-boycott laws prevent U.S. companies from being used to implement the foreign policies of other nations that conflict with U.S. policy. We are a U.S. Company and therefore these laws apply to all colleagues and to any activity conducted by Suppliers on our behalf.

We must never take any actions that would support a country boycott not approved by the U.S. Government. An example would be a Customer asking Parexel to refuse to do business with Israel in order to support the Arab League boycott of Israel. The Global Compliance department must be notified of all requests to support or comply with a boycott, including requests from Customers. Email Compliance@Parexel.com

Anti-Money Laundering

We will not accept, facilitate or support money laundering.

Money laundering is a process through which the ownership, destination and origin of illegally obtained money is concealed or disguised. The objective of money laundering is to make illegally obtained money appear to originate from a legitimate source.

You should never accept payments in cash or accept or make a payment to an entity that is not a party to the transaction or not legally entitled to receive payment.

Q: What are examples of a "Government Official"?

A: The following are examples of Government Officials:

- Government employees, including employees of regulatory agencies or departments such as tax, customs, regulatory health authorities (e.g., FDA, MHRA, etc.)
- Healthcare professionals and Investigators working in government-owned hospitals
- Public health officials
- Elected officials or candidates for public office

Q: What types of payments are permitted to government officials?

A: The following are examples of permissible payments:

- Investigator payments in line with the Clinical Study Agreement
- Fees paid to a regulatory authority according to published requirements
- Reimbursement of legitimate expenses
- Customs fee (paid by check to a customs broker with a receipt)
- Payment of a published amount to a government agency for faster processing of a passport or visa



Accurate Books and Records

Proper recordkeeping is critical to the integrity of Parexel's business.

We must keep accurate records and comply with our record keeping policies and internal accounting and financial internal control procedures.

Never allow anyone to record a transaction inaccurately, or in a way that hides where the money came from or the purpose for which it was used. Additionally, your expense reimbursements must accurately reflect the true nature and amount of the expense.

Global Sanctions

We must not engage with any entity or individuals in any sanctioned country or on the Specially Designated Nationals (SDN) lists.

Economic sanctions are:

- Restrictions imposed on trade and other commercial activities for foreign policy, national security, humanitarian, economic and criminal enforcement purposes

The U.S. Office of Foreign Assets Control (OFAC) administers and enforces economic and trade sanctions imposed by the U.S. against targeted:

- Foreign governments (e.g., sanctioned countries)
- Entities (companies, banks, etc.)
- Individuals (includes government officials and private individuals)

Parexel cannot do business with any:

- Entity or person in any sanctioned country ([click here](#) to see the current list of sanctioned countries)
- Entity or person found on the SDN lists

Who must comply with OFAC regulations?

- All U.S. citizens, U.S. entities and permanent U.S. residents located anywhere in the world
- All individuals, regardless of citizenship, and entities located in the U.S.
- All entities owned or controlled by U.S. citizens
- All transactions that involve — directly or indirectly — a U.S. person or bank

Q: A European-based Customer wants us to carry out services in Cuba, which is a U.S. sanctioned country but is not sanctioned by the European Union (EU). Can we use a local contractor to deal directly with the Cuban authorities to avoid direct interactions between Parexel and Cuba?

A: No. Parexel International Corporation is a U.S. Company and therefore all subsidiaries and colleagues, including our non-U.S. subsidiaries and colleagues, must comply with U.S. sanctions. This means we cannot work with a U.S. sanctioned country or an entity/individual associated with a U.S. sanctioned country (including embassies, consulates, and diplomatic offices located in non-U.S. sanctioned countries). In addition, we cannot avoid the sanctions by using third parties to do work for us that we would not be permitted to do ourselves. To do so would also be illegal.



Resources

- Refer to the [Global Sanctions Policy](#) for more information
- Report any concerns through the online Ethics Hotline [here](#).



What do Global Sanctions mean to Parexel colleagues?

- Parexel International Corporation is a U.S. based Company — all our subsidiaries and colleagues worldwide, regardless of location, must comply with U.S. sanctions laws (OFAC)
- U.S. sanctions apply to Parexel's operations globally regardless of:
 - The contracting legal entity
 - The choice of law under the applicable contract
 - The location of the Parexel colleagues performing the services, or
 - Whether our Customer is required to comply with the U.S. OFAC sanctions
- Every Supplier acting on Parexel's behalf, regardless of location, must comply with U.S. sanction laws
- We must not engage with any entity or person in any sanctioned country or with any sanctioned entity/individual on the SDN lists

How do we ensure we comply with these sanctions?

- By ensuring that we perform due diligence screening prior to hiring a new colleague or contracting with a new supplier. This Due Diligence Screening ensures we are not working with an individual or entity who is named on any sanctions, exclusions or debarment lists.

Q: A Customer wants us to carry out services in Syria, a U.S.-sanctioned country. The Customer contract is with our Parexel Ireland entity and the services will be supplied by my Parexel colleagues in Germany. Since no U.S. colleagues are involved this should be OK, correct?

A: No. Parexel International Corporation is a U.S. Company – all our subsidiaries and all colleagues worldwide, regardless of location, must comply with U.S. sanction laws. The sanctions apply to Parexel's operations globally regardless of the contracting legal entity, the choice of law under the applicable contract, the location of the Parexel colleagues performing the services, or whether our Customer is required to comply with the U.S. sanctions.

Q: I'm contracting with a new consultant who is not being qualified, do I need to do anything before I get them to start working for us?

A: You must request a Due Diligence Screening by sending the relevant Service Desk Ticket (for more information read the [job aid](#))



Global Trade

Parexel complies with U.S. and international trade laws and regulations.

We are a global Company and regularly transfer goods, services and technologies across borders. Our Company is committed to ensuring that these business transactions are carried out in full compliance with applicable local, regional, and international trade laws and regulations. This includes classifying and valuing products according to trade regulations, maintaining complete and accurate import/export records.

We also respect trade sanctions and import/export restrictions imposed by governments wherever we operate. Each country may have different requirements for clearing goods and for keeping records. Be careful, as the laws of more than one country can apply to a single transaction. Please reach out to your supervisor or the Global Trade Compliance team at GlobalTrade@Parexel.com to make sure your export and import activities comply with all applicable laws.



Resources

Questions about classification of goods and trade laws?

- [MAN-LRM-WW-003: Sanctions & Export Controls](#) explains the processes that have been implemented at Parexel to identify, mitigate and manage the risks in complying with sanction laws and export control regulations
- [SOP-CTSL-WW-018: Global Trade Compliance Management](#) defines the process for managing Import/Export activities for projects

Q: We are shipping some Parexel branded items for a Customer meeting in Argentina. The documents show no destination and a nominal value of 1 euro. Surely it does not matter what the documents state as these items are not involved in a clinical trial?

A: It is very important that all import/export documents are accurately completed. Different goods have different tariffs and applicable import/export regulations and some countries even have restrictions on printed materials. The Global Trade Compliance team must be informed via email (GlobalTrade@Parexel.com) and the document must be corrected and updated.

Q: A Customer has indicated to us that international shipments of supplies needed for clinical trials will be managed by them and they do not require our support. It seems to me that we don't have a reason to engage in any further discussions with the Customer on this topic?

A: When Parexel is managing the trial, including regulatory submissions, we might be legally responsible for compliance with the import/export regulations regarding the trial materials in some countries. In such cases, we must perform an assessment of what and how the supplies will be imported and/or exported during the study start-up phase. Please contact the Global Trade Compliance team at GlobalTrade@Parexel.com for assistance with this assessment.

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>>> Our Commitment to Respect

*Our core value of **Respect*** means we recognize, value and uphold the importance of all people, regardless of race, ethnicity, orientation, gender identity, religion or other differences. We embrace cultural customs and differences while firmly adhering to the highest standards of fair, safe and equitable business practice in every region of the world.



Respect and Equal Opportunity

We are an equal opportunity employer and make our employment decisions based on qualifications and merit. Our policies prohibit discrimination and we comply with the laws in each country in which we do business.

Our directors, officers, colleagues and Suppliers are expected to treat others with respect and dignity. We foster individual initiative and collaboration, and value different perspectives and cultures. We will not tolerate any form of harassment or violence.

Human Rights

We respect human rights in all facets of our organization and will not conduct business with companies or individuals that violate human rights, including:

- Child labor
- Forced, involuntary, slave or indentured labor
- Human trafficking
- Modern slavery
- Physical punishment

If you suspect a colleague, director, business partner or other third-party doing business with our Company is engaged in any activity that may violate human rights, report it to the Chief Compliance Officer or to the [Ethics Hotline](#).

Harassment-Free Workplace and Retaliation

Each of us is responsible for maintaining a work environment that is free from harassment. Harassment includes any verbal, visual, physical or other conduct that creates an intimidating, offensive or hostile

work environment. Behavior that constitutes unlawful harassment will not be permitted. Regardless of intention, harassment may be determined by how it impacts others.

If you see or are the subject of harassment, speak up and report it to your Line Manager, Human Resources or the Ethics Hotline. No one who is acting in good faith who reports suspected violations will suffer harassment, retaliation or adverse employment consequences such as demotion or suspension. Anyone who retaliates against someone who has made a report in good faith will be subject to discipline, including termination of employment. Good faith means the individual reporting the concern believes the information relayed shows misconduct against our Company policies.

Anti-Slavery

Parexel is committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. We are committed to ensuring our colleagues and all people have dignity and intrinsic value independent of the work they do. We treat our Suppliers and each other with respect.

As part of our commitment to combatting modern slavery, we work to ensure transparency with our Suppliers of goods and services and are mindful as to what steps can be taken to combat slavery and human trafficking.

We all have a responsibility to treat each other with respect and to call out slavery and human trafficking when we see it.

Q: Ahmed, a Financial Analyst, is returning from an errand and stops to speak to a few of his co-workers who are standing outside the office. Ahmed notices that Charles, a visiting Sales Manager, is slurring his words. Ahmed has never seen this from Charles before, and he is worried that if Charles goes to his next Customer meeting, he may be putting himself or others at risk. What should Ahmed do?

A: Managing this quickly may be important. If Ahmed believes that Charles needs medical treatment, he should call for medical assistance immediately. If Ahmed believes Charles is impaired, Ahmed should speak to his manager or one of the local Human Resources Business Partners.

Q: I work in IT and I notice that my current manager only seems to employ new staff that are the same religion as she is, even though many other applicants are better qualified. What should I do?

A: Please report this to local HR, to a more senior Line Manager, or via our Ethics Hotline for investigation. Our recruitment practices must always be fair. Managers are not entitled to recruit close friends, or to base recruitment on gender, religious or ethnic grounds.



Health and Safety

We are committed to providing a work environment that protects the health and safety of our colleagues and any visitors to our facilities. Each colleague is expected to understand and comply with the safety procedures applicable to his/her job and workplace.

Parexel prohibits the possession of firearms and/or other dangerous weapons at any Company facility, including parking lots.

The Company prohibits working while impaired by alcohol, illegal drugs or prescription drugs. We may never possess illegal drugs or controlled substances at Company facilities unless prescribed by a licensed medical professional.

Wage and Hour Rules

We are committed to following all applicable wage and hour laws and regulations. If you have questions or concerns about wage and hour issues, you should contact your Line Manager, Human Resources or the Ethics Hotline.

Diversity, Equity and Inclusion

We are committed to building and promoting an environment that is inclusive of all people and their unique abilities, strengths and differences. We respect diversity in each other, our patients, our Customers, our Suppliers and all others with whom we interact.

Inclusion means creating a workplace where people can be themselves regardless of their gender, gender identity, religion, age, race, color, disability, ethnicity, cultural affiliation, sexual orientation or beliefs. We each play an important role in developing a truly inclusive culture and are responsible for valuing and promoting the unique talents, innovation, creativity, and strengths of our diverse workforce.

Q: Susan and Joe were participating in a conference call. After the call, Susan made an offensive comment about other colleagues on the call. Joe feels uncomfortable because this isn't the first time Susan has made comments or jokes that are inappropriate. What should Joe do?

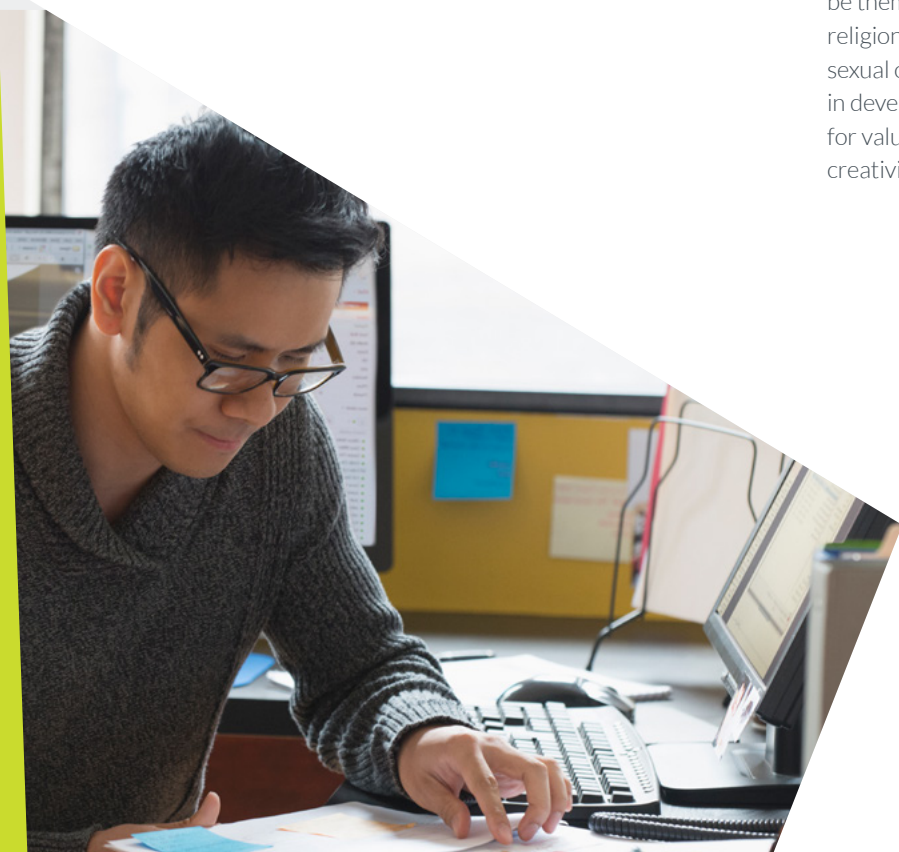
A: Susan's comments are inappropriate and if Joe is not comfortable raising his concerns directly with Susan or Susan's Line Manager, he should speak with Human Resources about her behavior.

Q: Janet is a Depot Technician and is responsible for handling and packaging a controlled substance for a clinical study she has been assigned to. Is her handling of these controlled substances a violation of this Code?

A: No. Handling controlled substances is part of a Depot Technician's responsibilities, and as long as Janet is handling the controlled substance in compliance with Standard Operating Procedures and Good Documentation Practices, this is not a violation of the code.

Q: I heard that a Supplier working on my project has a reputation for questionable labor practices. Should I say anything?

A: Yes. Any suspicion of human rights violations should be reported immediately to the Chief Compliance Officer or through the [Ethics Hotline](#).





>>> Our Commitment to Customers and Business Partners

Being ethical is the cornerstone of being a trustworthy business partner. Our **core values** mean we treat every Customer and Supplier fairly and impartially to ensure that our business decisions are based on the merits of the individuals and organizations with whom we do business and not on personal interests or perceived inducements that could convey the appearance of impropriety.



Gifts and Entertainment

Gifts and entertainment must comply with the Company's Gift and Entertainment Policy.

We expect all colleagues to read, understand and comply with the above [Policy](#). The following are key points to be aware of:

Government officials: Gifts, business meals and entertainment to or from any governmental official or their family are not permitted.

Healthcare Professionals (HCPs): Special care is required when dealing with HCPs. In many countries, HCPs are government officials subject to additional special rules and regulations. We must also comply with various codes for interactions with HCPs and other industry standards:

- Gifts and entertainment to or from HCPs are not permitted
- Business meals for HCPs may be permissible provided they comply with the Gift and Entertainment Policy and with Parexel's [Rules on Interactions with Healthcare Professionals](#)

- **Business-to-business gifting:** Only gifts of nominal value are permitted to be exchanged (given or received) with Customers, Suppliers or other third parties. The following rules must be followed:
 - Cash, including gift cards, is always prohibited.
 - All gifts must be reasonable
 - Reasonably priced business meals are permitted provided they have a legitimate business purpose
 - The exchanging of gifts and/or paying for meals must not influence, nor appear to influence, any business decision by, or in favor of the Company
 - Gifts to or from HCPs and government officials are prohibited

Any colleague who is offered a gift or participates in an event that does not fit within the above guidelines, or the value is >\$150 (or equivalent in local currency), must report it to Compliance@parexel.com. You may also contact Compliance if you have questions about what is permitted.

Q: If a Principal Investigator wishes to extend his travel plans when attending an Investigator meeting to facilitate personal vacation, can this be handled by the team?

A: No. We cannot directly facilitate the reservation for any additional days, and we cannot cover payment for any additional travel costs.

Q: We have invited several physicians to participate in a Customer-sponsored Advisory Board meeting. One of the physicians has asked to bring his spouse. Is this permitted?

A: Spouses or guests of the HCP should not be invited to the event. Only HCPs that have a legitimate interest and role in the business discussion should attend. If an HCP insists on bringing a spouse or other guest, the HCP is responsible for paying for the spouse's or guest's meal and managing all other travel and hospitality reservations and expenses.

Q: I have a training event for the Principal Investigator (PI) and Sub-Investigators (Sub-I) at one of my sites that will run into the lunch hour. May I provide lunch for the attendees? What about the remainder of the site staff (i.e., study coordinators and office staff)?

A: Meals may only be provided to those individuals who participated in the business interaction/event. You may provide a reasonable meal for the PI and sub-investigators. No meals may be provided to other staff who are not attending the training event.

Interactions with Healthcare Professionals

Parexel is committed to conducting business with Healthcare Professionals (HCPs) in an ethical and professional manner consistent with applicable laws, regulations and industry codes, and with the best interest of patients in mind.

An HCP is anyone who administers, purchases, prescribes, supplies, or recommends prescribed medicines or products. This includes Principle Investigators who are the lead researchers for study sites participating in a clinical trial.

Regulations governing HCP interactions can be complex and vary country by country. We have developed [Rules On Interactions with Healthcare Professionals](#) to assist you in navigating the common areas for interactions with HCPs and to comply with these global regulations. Where local laws and regulations impose more stringent requirements, you must always comply with the more restrictive obligation.

Anyone that will be interacting with HCPs as a part of their responsibilities is obligated to read and understand our “Rules on Interactions with Healthcare Professionals.”

Key Points

Whenever you interact with an HCP always ensure:

- It is for a legitimate business need and contracted at fair market value rates
- Complies with applicable laws, regulations and codes
- Is not an attempt to inappropriately influence the HCP's prescribing or purchasing decisions
- Is fully and accurately accounted for within Parexel's financial records

Anti-Trust & Fair Competition

We believe that fair competition is in everyone's best interests.

Parexel is committed to winning business legally and ethically based on the quality and excellence of our services. We obtain information about our competitors and our Customers' competitors from public information sources or contracted third-party Suppliers that legally gather such information.

We comply with antitrust and competition laws everywhere and compete fairly. Therefore, you should:

- Never comment on competitors' services in an inaccurate or untruthful manner
- Only use lawful ways of obtaining competitive information
- Respect the confidential information of our competitors and other third parties
- Never ask anyone else to collect information in an unethical way on our behalf or on behalf of a Customer

When dealing with competitors, you should never enter into any agreement, whether formal or informal, written or verbal, in order to:

- Set prices or other terms of sale
- Coordinate bids
- Allocate Customers
- Engage in any other activity that violates applicable antitrust or competition laws



Q: The General Manager at a Parexel facility is asking for approval to send biscuits and cakes to local government officials in celebration of a national holiday. The value of the gift is small (about €20 or \$24 per person). Is this okay?

A: No. It is not permitted to give government officials anything of value, even token gifts.

Q: How should we handle gifts at holiday times?

A: Our Policy prohibits colleagues or contractors working on our behalf from giving or receiving gifts unless the gift is of nominal value, reasonable and for appropriate business purposes. Examples of nominal value gifts are low-value items that are branded with a Supplier, Parexel or Customer logo. For example, branded low-cost pens, t-shirts or stationery. Edible items like boxes of chocolates, biscuits and cake that can be shared with your group or team are also acceptable.

Q: A Customer verbally shared some information with me about our competitor's pricing. Can I use that information to modify our bid and bring our price in line with our competitor?

A: If the information was confidential, the Customer should not have shared it with you. You must not share it with your colleagues or use it, as this is unethical and possibly illegal.



Resources

- If you have questions about what is permitted, email the Global Compliance team at Compliance@Parexel.com
- Check out our [Rules for Interactions with Healthcare Professionals](#)

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Maintaining Ethical Relationships with Suppliers

Parexel often engages contractors, agencies, Suppliers and other third parties (collectively “Suppliers”) to conduct business on behalf of our Company and our Customers. We must always select qualified, reputable Suppliers that share our commitment to doing business with integrity.

Any colleague engaging a third party providing goods or service must:

- Act in the Company’s best interest when selecting a Supplier
- Never receive a personal benefit as a condition to select or continue an existing relationship with a Supplier
- Conduct appropriate due diligence (financial, debarment, sanctions, etc.) before selecting a Supplier
- Always base the selection of a Supplier on objective criteria such as price, quality of goods or services, capability, expertise, reputation and past performance
- Always execute agreements at fair market value rates that are aligned with industry standards based on a Supplier’s qualifications, expertise, location, etc.
- Always treat Suppliers with respect and protect their confidential information

Employee Conflict of Interest

We must always act in such a way that our personal interests and those of our immediate family members do not take preference over the interests of the Company.

Each of us has a responsibility to avoid situations where our actions or personal interests create a conflict with the Company’s interests. The following are some common areas where conflicts may occur.

Outside Activities: Outside activities are generally not allowed when they:

- Prevent the colleague from fully performing work for which he or she is employed at Parexel, including overtime assignments, or adversely affect the quality of work performed
- Involve organizations that are doing or seek to do business with the Company, including actual or potential Suppliers or Customers
- Involve employment or work with companies that compete with the Company
- Violate provisions of law or the Company’s policies or rules

Financial Interest: A colleague or an immediate family member may not hold, directly or indirectly, a position of financial interest in another company from which Parexel secures or provides goods or services.

Gifts and Gratuities: Accepting gifts, including entertainment, must comply with normally accepted business practices. Gifts must be of nominal and reasonable value. Any gift that may compromise our or the supplier’s ability to make objective business decisions is not permitted.





Conflict of Customer Interest

A conflict of interest with a Customer exists when the Company provides services for two or more Customers that may directly or indirectly influence or impair services, confidentiality or contractual relations with one or both of the Customers.

Examples of what may lead to a conflict include:

- The Company provides services for two or more Customers with identical or similar products
- Recruiting patients for more than one study in the same indication, so as to create competition for the same patients at a given site
- Providing consulting services to two identical or substantially similar products

Colleagues are required to notify their relevant Strategic Business Unit (SBU) Heads of any potential Customer conflict of interests. The SBU Head will review relevant information about the potential conflict and determine what actions, if any, should be taken to avoid a conflict of interest and avoid compromising services to the Customer.

Securities and Insider Trading

You may have access to material, non-public information about our Company, our Customers or 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 (securities) and which could therefore reasonably affect the price of stock. This is sometimes known as “insider information.” As an employee,

you must hold this information confidential and you may 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 those securities. Reference our policy on [Insider Trading](#) for more information.

In addition, you may not pass along any non-public, material information or tip anyone to buy or sell securities while in possession of this non-public, material information associated with those securities.

There are a variety of ways that insider trading can occur:

- Colleagues of a publicly traded company with access to information that is not available to the public buy or sell securities based on this information and hope to profit from it when the news is eventually released.
- Colleagues share confidential information with friends, family or acquaintances with the intention of allowing their family or friends to trade securities with the hope they profit from it.
- Colleagues give tips to help out a friend in a tough time or they may be asking their friends to pay them a small incentive for confidential information.
- Colleagues trade indirectly through their friends and acquaintances in order to avoid detection by the relevant authorities.

Q: When does information become public?

A: Information becomes public once it has been released publicly such as on a public website, via a press release or in a news article. Please always check with Corporate Communications or the Legal and Risk Management Department before sharing any information outside the Company..

Q: I'm aware of non-public information about the results of a clinical trial that I worked on. Am I allowed to buy shares in the Customer company, or can I tell my brother who does not work for Parexel?

A: No. This information is not public, and it is illegal for you or anyone you know to trade in shares while using such information.



>>> Managing Information and Assets

Protecting confidential information with every tool and technology at our disposal demonstrates our commitment to **our core values**. From the smallest detail to the largest data set, we protect all types of confidential information regarding colleagues, Customers, Suppliers, patients and other partners using the utmost care and sensitivity to ensure it remains confidential.

Protecting Confidential Information

Protecting Parexel, Customer and Supplier confidential information is everyone's responsibility. In our fast-paced business environment we must be careful to avoid improper disclosure of this information.

Colleagues, officers, directors, contractors and agents must maintain the confidentiality of information entrusted to them by Parexel and other companies, including our Customers and Suppliers, unless disclosure is authorized in writing.

Confidential information should only be shared with people who need to have the confidential information to perform their duties for the Company. Confidential information should not be shared with anyone outside the Company without having a confidentiality agreement in place with the recipient of the confidential information.

Please remember that any unauthorized disclosure (UD) of confidential information, even if unintentional, can have consequences for Parexel and our Customers. You must also abide by contractual obligations regarding confidential information that you have to your former employer(s) or others.

PROTECTING CONFIDENTIAL INFORMATION



What should you do if you disclose confidential information?

The following steps should be taken if confidential information has been improperly disclosed.

1. Reach out to your Line Manager. It is important that they are aware, so they can support and guide you.
2. Submit a Service Desk ticket.
3. If project related, contact the Quality Lead and Project Leader of your study.

[Click here to access the Corporate Policy](#)

STOP &

THINK

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Data Protection and Privacy

We handle all personal data with care.

In our everyday course of business, Parexel collects and processes the personal data of our colleagues, clinical trial subjects, investigative site staff, Customer employees, business partners and their employees, independent contractors, agency workers and others.

We are committed to respecting data protection and privacy and have developed data protection and privacy policies and procedures that govern the processing of personal data by either Parexel or our business partners.

We use many different systems to manage, process, receive and share this personal information. Every colleague must ensure they are doing so in compliance with data protection and privacy policies, laws and regulations.

If you are aware of a potential violation of our Data Protection and Privacy Policy affecting personal data, you must report the issue to the Data Protection and Privacy group within 24 hours.

Intellectual Property

Intellectual Property (IP) is an irreplaceable asset and our colleagues must secure and protect these assets. IP includes copyrights, trademarks, patents, in-house developed software, trade secrets, decision rights, logos and brand know-how.

Please contact LRM at LRM-BDRequest@Parexel.com should you have any questions regarding the Company's IP.

Use of Company Assets

We all have a responsibility to ensure that Company assets and resources are used appropriately and to protect them from loss, damage, theft, and improper use. Parexel technology assets include email, instant messaging tools, internet access, computer networks, Company-issued mobile devices and computers, and all Parexel-owned and -licensed software. Our IT systems and assets remain the property of Parexel at all times and should never be

used in any way that would be unlawful, offensive, inappropriate, disruptive, harassing, threatening, disrespectful, or otherwise not in accordance with Company policies.

Parexel retains the right to access Company equipment and technology and the information created, downloaded, and/or shared using Parexel resources to the extent permitted under applicable law. There is no expectation of privacy when using Parexel's systems or assets, except as required by law.

Our equipment, mobile devices, emails, supplies, and systems are for business purposes. Some limited personal use is acceptable so long as it does not interfere with your work nor the work of others and in a manner that would not damage the company's reputation.

Remember to keep your computer equipment safe and secure at all times and protect your IDs and passwords.

Media

Corporate Communications is responsible for all decisions related to media communications.

Only the Company's authorized spokespersons may respond to inquiries concerning the Company from the media and industry or financial analysts. If you receive inquiries of this nature, you should immediately refer the person inquiring to CorporateCommunications@Parexel.com.

Social Media

"Social Media" includes any computer-based platform that helps individuals to create and share ideas, thoughts and information in a public forum.

Never share confidential or proprietary information of the Company, our Customer or business partners. Know and follow our [Authorized and Unauthorized Use of Social Media Policy](#) and other applicable policies when engaging in any social media activities, particularly activities that may impact the Company.

Q: What are some examples of misusing Company resources?

A: Charging personal expenses on Company credit cards, using Company vehicles for unauthorized personal transportation needs and reselling Company equipment for your financial gain are all examples of misusing Company resources.



Resources:

Protection of Personal Information must be in accordance with the data protection and privacy principles as outlined in our three key policies relevant to how we protect the data of our colleagues, patients and stakeholders:

- [CP 805: Data Protection and Privacy](#)
- [CP 809: Study Subjects Data Privacy](#)
- [CP 812: Employee Data Privacy](#)

For further questions refer to the [FAQ](#).

Refer to the following policies for more information on Media Interactions and use of Social Media:

- [CP 608: Authorized and Unauthorized Use of Social Media](#)
- [CP 816: Corporate Media Policy](#)
- [Corporate Communications Sharepoint Site](#)

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>>> Corporate Social Responsibility

At Parexel, we act *With Heart*[™] to build stronger, healthier and more vibrant communities around the world. Our commonality of purpose strengthens our resolve and builds our momentum to pursue greater opportunities across the globe to improve patients' lives, reduce suffering and drive positive change. We encourage our colleagues to support causes of their choice and to participate in Parexel's corporate social responsibility initiatives for the betterment of humankind.

Charitable Donations

Our Company is committed to supporting our communities and we support our colleagues in these efforts.

We understand that corporate social responsibility means being a good neighbor in the communities in which we operate. While each of us is encouraged to become involved in our local communities by supporting causes and events, it's important to not pressure others to contribute or participate in our preferred charitable organizations.

Any donations to charities made on behalf of Parexel must be pre-approved by the President, Commercial & Consulting and Chief Commercial & Strategy Officer.

Political Activities

We encourage our colleagues to get involved in local and community activities by participating in the political process. These activities are considered personal volunteer activities and may include individual political activities carried out on your own time.

The laws governing political contributions vary depending on location and circumstance. In some limited instances, and where permitted by local law and regulation, the Company may contribute to organizations or entities that engage in the political process to address an issue that directly affects the Company and its business activities. At no time may Company managers solicit political contributions from direct reports or their employees.

Social Responsibility, Sustainability and Environment

Sustainability initiatives and corporate social responsibility are built into the culture and operations of Parexel. This starts with our Mission, Vision and Values and is driven through the daily actions of our colleagues.

At Parexel, we have defined sustainability as preserving the longevity of our working environment both internally and externally. Sustainability is very much part of our corporate culture and Parexel's identity is consistent with our focus on ethical behavior and compliant practices.



>>> Code Resources

Your Code Resources At-a-Glance	
Who can you seek help from: <p>Should you have any questions regarding this Code or a situation that you are facing, you may seek help from any of the designated contacts that you feel comfortable reaching out to.</p>	Contact Your: <ul style="list-style-type: none"> • Manager • HR Business Partner or another member of Human Resources • Any Compliance Officer • A member of Legal & Risk Management
Ethics Hotline & Website <p>Within Parexel's Ethics Hotline you may:</p> <ul style="list-style-type: none"> • Ask a question • Report a concern or misconduct • Follow-up on a report • Find Speak-Up FAQs • Access our Speak Up Policy 	Accessing the Ethics Hotline & Website: <ul style="list-style-type: none"> • www.Parexel.EthicsPoint.com to file a report via the web or by phone <ul style="list-style-type: none"> • Click on your country under Make a Report to find the local number • Click here for a list of phone numbers to report a concern or ask a question
Global Compliance Team <p>The Global Compliance Team is available to assist you with any questions or concerns you may have. We have a number of ways that you can reach us.</p>	Contact: <ul style="list-style-type: none"> • Marty Mahoney, Chief Compliance Officer • Members of Parexel's Compliance Team can be found here • Send an email to Compliance@parexel.com
Additional Resources: <p>You can find additional information via the Compliance Intranet page, including relevant Policies & Procedures, etc.</p> <ul style="list-style-type: none"> • The Compliance SharePoint Page • Compliance Policies & Procedures • Anti-Bribery Anti-Corruption (ABAC) Red Flag Info Sheet 	

Annual Review of Code

We will review this Code annually to ensure that it reflects our values, our communications and our actions. This Code will be posted publicly online.