





Integrity is the foundation of WCG's mission to improve lives by accelerating research, together. Our commitment to strong ethical behavior is outlined here in our Code of Business Conduct (Code). This Code and our corporate compliance program are a framework for conducting ourselves ethically. Our Code is not just a compilation of rules -- it is a guide to operating with integrity. I ask each of you in the WCG family to dedicate yourself to following this Code and personally implementing it in all your daily business activities.

I am proud to lead a company that empowers our employees and contractors to do the right thing. You are each critical to preserving WCG's reputation, which is our most valuable asset. If we continue to uphold the standards of this Code, we will only further strengthen and foster that reputation.

Whenever you are in doubt about a decision, seek help and advice. This Code tells you where you can find that help. Do not allow anything to compromise your commitment to integrity.

Thank you for carrying on WCG's mission and fulfilling the obligations of this Code.



**Sam Srivastava**  
Chief Executive Officer

## FOLLOWING THE CODE

The WCG family of companies (WCG) is proud to serve the individuals on the frontlines of science and medicine, and the organizations that strive to develop new products and therapies to improve the quality of human health. We act with integrity in all we do and reach beyond just compliance. We do the right thing because it's the right thing and we seek help when we aren't sure.

This Code applies to all directors, officers, employees, contractors and consultants of WCG, as well as to any directors, officers, employees, contractors, and consultants of any subsidiary (owned wholly or in part by WCG), of any joint ventures, and of any WCG acquired entities.

While the Code cannot describe all situations where questions of ethics may arise, it is a resource for identifying red flags, making ethical business decisions, and helping you understand what WCG expects of each of us.





## Manager Responsibilities

While we are all expected to do our part in understanding and following the Code, WCG managers at all levels have an additional responsibility to lead by example and uphold our values.

### Managers must:

- Demonstrate the highest ethical standards and quality in their work and expect the same from every other team member
- Never bend the rules or pressure others to do so
- Understand and communicate laws and regulations affecting their areas of operation with support from the Legal Department and other company subject matter experts
- Encourage team members to speak up without fear of retaliation
- Recognize and affirm the ethical conduct of their people
- Take steps to prevent problems before they happen
- Report problems or possible violations to Human Resources, Legal Department, or Compliance Department
- Promptly seek guidance when unsure about the right thing to do



### Managers who engage business partners must:

- Provide effective oversight of vendors and contractor personnel to ensure third parties adhere to applicable contract terms, provisions of the Code and company policies and procedures
- Take action – including reporting to the Compliance Department or Procurement and taking appropriate actions up to and including terminating a contract – if a party fails to honor its obligations

## Reporting Possible Violations

Ethical and legal lapses can harm any number of WCG stakeholders – from employees and clients to the research participants and communities we serve. They can also negatively impact our financial performance as well as our hard-earned reputation.

We all have the responsibility to report promptly – and in good faith – any activity that may violate the Code or any other applicable laws, rules, or regulations. As noted in the Resources section, there are multiple options for reporting possible violations.

All reports will be treated confidentially, to the fullest extent possible under the circumstances. Employees must cooperate completely and honestly in any investigation. When an allegation is substantiated, WCG will take appropriate corrective action, including measures to prevent recurrence where appropriate. This obligation does not imply any constraints on the exercise of an employee's rights to report a concern to regulatory authorities.

## The Ethics Help Line

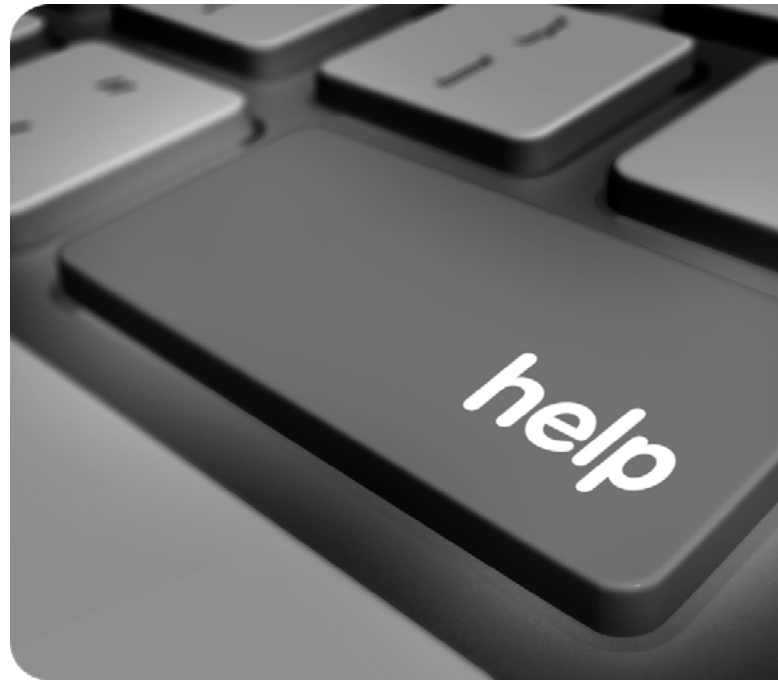
The Ethics Help Line and Web Portal are available for all stakeholders 24 hours a day, every day of the year. Both have an anonymous reporting option. The Ethics Help Line is a dedicated resource for asking compliance and ethics questions, raising compliance and ethics concerns, and reporting actual or suspected violations of the law, the Code or WCG policies.

All calls to the Ethics Help Line are answered by an independent third-party vendor that offers multilingual service. Caller ID is not used, and no attempt is made to identify a caller who wishes to remain anonymous. A report of each call is forwarded to the Compliance Department for assessment and appropriate follow-up action.

Individuals accessing the Help Line will be issued a case number and a confidential PIN number that allows them to follow up on a report, even if they have chosen to remain anonymous. During a follow up, they can access responses from the Compliance Department, including requests for additional information that may be required before an effective investigation can occur.

The Ethics Help Line (with anonymous reporting option) can be reached:

- Online at: [www.lighthouse-services.com/wcgclinical](http://www.lighthouse-services.com/wcgclinical)
- By Toll Free Phone at:
  - English speaking USA and Canada: 833-930-0001
  - Spanish speaking USA and Canada: 800-216-1288
  - French speaking Canada: 855-725-0002
- By E-mail: [reports@lighthouse-services.com](mailto:reports@lighthouse-services.com)



# OUR PEOPLE

At WCG, a respectful and safe workplace is key to our success.

## Diversity, Equity, and Inclusion

At WCG, we embed diversity, equity, and inclusion (DEI) in all we do, firmly anchored by our Values. Our patient first philosophy drives everything from managing clinical trial access for all to ensuring clinical trials are conducted ethically. We lead with courage, innovation, and inclusivity to shape the future of the industry by valuing the perspectives of all and working collaboratively to care for clients, employees, our communities, and the beneficiaries of clinical research everywhere. With ethics at our core, we operate in and promote an environment of mutual respect, inclusion, and accountability where every employee can bring their authentic self to the work they do every day.

## Equal Opportunity Employer

We ensure that equal employment practices apply in the recruitment, hiring, training, and promotion of the most qualified candidates, regardless of personal characteristics. We provide competitive compensation and work hours, and we prohibit the use of child and forced labor.

## Health and Safety

Each WCG employee and contractor has a responsibility for maintaining a safe workplace and must immediately report to management serious accidents, injuries and unsafe practices or conditions. Violence and threatening behavior are not tolerated under any circumstances. No weapons are permitted at our offices or on company property. Employees and contractors should report to work in a condition to perform their duties, free from the influence of illegal drugs or alcohol. If you see any signs of immediate danger, contact local emergency services then report the situation to your manager.

## Workplace Respect

We respect the diversity of ideas and encourage an atmosphere of trust, fairness, openness, and candor. We place a high value on a tolerant, respectful work environment.

## Harassment and Discrimination

We do not tolerate any form of discrimination, bullying, sexual harassment, or physical abuse. We prohibit discrimination or harassment based on age, race, color, ethnicity, national origin, gender, religion, sexual orientation, gender identity, marital status, veteran's status, disability, or any other characteristic protected by applicable laws.

## Disconcerting Dinner

**Q.** Our team celebrated a recent project with a company-sponsored dinner at a local restaurant. One of my co-workers told several sexually suggestive jokes and made a comment about one of our female co-workers. Several employees looked uncomfortable, but no one said anything. Shortly afterward, I noticed one female co-worker leave the restaurant abruptly. What should I do?

**A.** You should speak up. If you're comfortable, tell your co-worker that the jokes and comments are unwelcome. Whether or not you address it directly with your co-worker, you need to report the incident to your supervisor, Human Resources, the Compliance Department, or the Helpline. Fostering a healthy culture means that no employee should be made to feel uncomfortable, even in a "social" setting.



# COMPETING FAIRLY

## Business Courtesies

We understand the value in using gifts, meal, and entertainment to create goodwill and sound working relationships. Such business courtesies should be for a legitimate business reason, reasonable and customary, infrequent, given openly and transparently, and properly recorded in our books and records. We do not give or receive gifts or entertainment that are lavish or made for the purpose of influencing a business decision. Items of small value such as business meals or business entertainment (typically, \$200 or less and provided that the WCG employee is present at the meal or entertainment), and token gifts or advertising materials (calendars, pads, pens and the like) of nominal value are generally permissible.

Government employees inside and outside the U.S. are subject to complex laws and regulations that strictly limit their ability to solicit, receive, or accept business courtesies, including meals, favors, entertainment, loans, hospitality, or other things of value from companies and persons with whom the government does business or over whom it exercises regulatory authority. Health Care Providers and those entities who accept government grants and related funding also often have limitations on what may be accepted. Occasional gifts may be provided to government officials and other individuals, provided they are modest, inexpensive, customary, and permitted by local law or regulation. Expenditures for hospitality for government officials should be reasonable, customary, and comply with local law. WCG corporate entities and WCG employees and contractors are prohibited from offering, paying, soliciting, or receiving anything of value that results in a referral for healthcare. Charitable contributions or other payments should not be made to customers or other organizations for the purpose of inducing them to recommend or purchase WCG companies' products.

WCG employees may not accept gifts from clients, investigative sites/centers, suppliers/vendors, or customers at any time.

## Dealing with Third Parties

We choose our partners carefully. Our reputation is tied to the actions of those with whom we choose to do business. If you engage a business partner, vendor, or supplier, you must ensure that their reputation in the market is solid, ensure they are qualified to do the work that we are hiring them to do, only pay fair market value for the products or services they are providing the Company, and report any red flags to the Compliance Department immediately.



## Competitive Intelligence

As we evolve our business, we constantly monitor the competitive landscape and analyze industry trends. Below is a list that includes some generally acceptable and generally unacceptable sources of competitive intelligence. If there is ever a doubt about how we are gathering information, discuss it with your manager or contact the Legal Department for more guidance.

### Generally Acceptable:

- Public web sites and social media
- Newspapers and trade journals
- Public financial filings
- Marketing materials
- Third-party market research and analysis
- Government agencies, customers and suppliers (unless protected by a confidentiality agreement)

### Generally Unacceptable:

- Emails intended for others
- Proposals
- Price sheets
- Process documents
- Business plans
- Found documents
- Non-public due diligence associated with M&A activity and other transactions
- Materials governed by a confidentiality agreement

## Government Interactions

Those who interact with government agencies and officials, whether as in their capacity as regulators, customers or otherwise, have the responsibility to:

- Ensure compliance with all applicable laws and regulations when a government entity is a customer, including government procurement and contracting regulations (e.g., Federal Acquisition Regulation)
- Comply with all applicable laws and regulations governing interactions with public officials, including laws relating to lobbying, campaign contributions, gifts and entertainment, and ex parte communications
- Provide timely, responsive, and accurate information in connection with any regulatory reporting requirements, information requests, or proceedings
- Cooperate fully and honestly with any government or law enforcement inquiry

## Lobbying

Lobbying of U.S. federal, state or local government or public officials may not be done on Company's behalf or in Company's name (unless there is prior authorization from the Chief Legal Officer). Lobbying includes any effort to influence a politician or public official on an issue.

## Political Activities

WCG employees and third parties are prohibited from making political contributions using WCG resources or partaking in political activities using WCG resources. WCG does not make corporate contributions to any political party or representative.



## Benchmarking Bother

**Q.** A peer company sent a few employees to WCG for a benchmarking trip. During the meeting, our guests asked for copies of specific policies and procedures. Can I share them with another company?

**A.** There is tension between the company's inclination to share best practices for the benefit of the industry and our legitimate need to control WCG's proprietary information. In most situations, the right balance is to not hand over our policies and procedures, but rather to provide the other company's personnel with a verbal overview. Contact your management team, the Legal Department, or the functional area that has governance over specific documents with questions.

## OUR BUSINESS TRANSACTIONS

Maintaining accurate and complete records and protecting and using our company assets appropriately are critical to our successful operations. Always comply with company processes and procedures, especially those designed to help us avoid violations of policy and the law.

### Protecting Confidential Information

Business information is a critical WCG asset. We must closely protect the company's confidential information and intellectual property against unauthorized disclosure and misuse, which could limit our growth and threaten our ability to compete in the future. Protecting WCG's confidential information requires that we:

- Never post confidential information on any social media or generative artificial intelligence sites
- Never send confidential information to personal email accounts
- Never work with or discuss confidential information in public areas, such as airplanes, elevators, and restaurants
- Keep confidential information secure
- Share sensitive information only with authorized co-workers or business partners who have a legitimate need to know
- Never divulge confidential information to persons outside of WCG, except where such disclosure is authorized, legally mandated, and subject to a confidentiality and non-disclosure agreement
- Continue to protect WCG confidential information even after we leave the company
- Protect our customers' or suppliers' confidential information as we would protect our own

### Examples of Confidential Information

Business plans, reports, and projections (including estimates or reports of production, reserves, and resources)

Marketing and sales strategies

Patents, trademarks, and other intellectual property

Inventions, ideas, proprietary information, and trade secrets

Applications, proposals, and contracts

Unpublished financial information

Confidential information belonging to other parties with which we do business

Technological developments and designs

Computer software

Employee personal data



## Intellectual Property

It is essential for all employees to safeguard WCG's trade secrets and confidential information and to refuse any improper access. Company proprietary information must not be discussed with others within WCG, except on a strict need-to-know basis. If there is a need to disclose WCG trade secrets or confidential information to any person outside the company, such disclosure must be done only in conjunction with an enforceable non-disclosure agreement. Similarly, WCG's rights related to its technology and products must be protected by use of appropriate agreements whenever such technology and/or products are used, transferred, or disclosed.

## Accurate Books and Records

We ensure that WCG's books and records, specifically our financial accounting records, are true, accurate and complete. Follow WCG policies around financial reporting controls as well as all applicable accounting principles. Even if you are not personally responsible for the preparation of financial reports, you are responsible for ensuring that relevant transactions—from a dinner receipt to an invoice approved for payment—accurately reflect the transaction. Should you become aware of any records, material, or other information that reveals fraud, you must immediately bring it to the attention of the Legal Department.

## Global Trade

We comply with all restrictions on imports, exports, and other dealings with certain countries, persons, or groups. We screen all customers, partners, and suppliers to confirm that they are not subject to

sanctions, including trade embargoed countries and politically exposed parties. We do not support boycott activities without first consulting the Legal Department. If your work involves the sale or shipment of products, technologies, or services across international borders, consult the Legal Department before starting that work.

## Managing Records

Proper records management is essential to the vital flow of information within WCG. It also reduces risks associated with outdated information and helps us meet our legal obligations and respond appropriately in legal and regulatory proceedings. Company records may be electronic, paper, or other media and include communications, policies and procedures, purchase orders, invoices, and contracts, reports, memos, analyses, maps, schedules, tables, presentations, and financial models, personnel files and production reports. Always maintain, retain, and destroy business records in accordance with internal procedures.

## Protecting Personal Information

WCG collects and stores personal information about clinical trial participants, employees and contractors, and others as necessary for various lawful business purposes. The lawful processing of such information is critical to WCG's business activities. WCG strictly limits access to any personal information and requires that each of you take measures to protect data from unauthorized access. You may only collect, use, and access personal information as authorized by applicable privacy laws, WCG's privacy policy found at: [www.wcgclinical.com/privacy-policy/](http://www.wcgclinical.com/privacy-policy/), and applicable SOPs.

## Protecting Company Assets

WCG's assets are essential to running our company efficiently, effectively, and profitably. Each of us is responsible for protecting company assets. This includes using them wisely, taking reasonable steps to ensure they are not damaged, abused, destroyed, wasted, lost, or stolen, using them only for WCG business purposes, regardless of condition or value, never selling, lending, borrowing, giving away or disposing of company assets without proper authorization, and promptly reporting any abuse or misuse.

- Physical assets include anything tangible that we use to conduct our business, from office supplies to computers to furnishings, computers, software, land, buildings, and vehicles
- Information assets include any data relating to WCG's business, no matter how it is created, distributed, used, or stored, including software and data in our files and on our servers
- Intangible assets include WCG's ideas, inventions, improvements, intellectual property, designs, copyrights, licenses, trademarks, patents, and trade secrets
- Financial assets include money and anything that can be converted to money, such as stocks, bonds, loans, and deposits

## Using Information and Communication Systems Responsibility

WCG's information and communications systems are critical to our mission. Our information and communications equipment and systems includes computers, collaborative platforms, and networks. They are the property of WCG, as are the contents of communications shared over these systems, such as email, voicemail, social media posts, direct/instant messages, recordings, texts, and any other electronic messages. WCG may inspect your files and records or monitor your Internet usage at any time without your consent, as permitted by law.

- Grant access only to authorized individuals and rigorously protect the identity and access
- Take precautions to ensure company systems and devices are not vulnerable to malicious threats, such as malware and phishing schemes
- Recognize there is no reasonable expectation of privacy when using company-provided systems
- Take the same care composing an electronic message that we would when writing on company letterhead
- Never use WCG information, communications systems, or equipment for illegal or unethical activities, such as viewing or sending content that is pornographic, obscene, sexually oriented, harassing, violent, discriminatory, likely to incite hatred or otherwise offensive

## Acceptable Use

Q. What is "acceptable use?"

A. Incidental, infrequent, and reasonable personal use of WCG mobile devices, computers and related resources is acceptable. Limited personal use of the company's electronic information assets is permitted if it is not detrimental to the productivity of the employee or co-workers, does not cause liability or additional costs to the company, and is not otherwise prohibited by management.

# OUR COMMUNITIES

## Sustainability

WCG promotes sustainability and environmental awareness everywhere we operate by complying with all applicable environmental laws and sustainability commitments, minimizing the carbon footprint of our business environments. WCG is committed to preventing pollution and reducing consumption of resources through waste management strategies that promote waste minimization, re-use, recovery, and recycling, as appropriate. By incorporating energy efficiency measures into our office facilities, promoting efficient energy use in all areas of business activity and continuing to invest in technologies that provide alternatives to business travel, we respect our environment. In procuring materials and services, we are mindful of the environmental impact of the products and services we buy and focus on finding energy-efficient options.

## Social Media Use

Social media – networking sites, video/photo sharing, blogs, forums and others – are powerful forms of communication that are widely being used to share opinions and seek information. If we choose to use social media, we must keep in mind that what we say or share can affect our clients, our colleagues, our compliance with laws, and our reputation. Always:

- Use good judgment and common sense when using both public and private social media platforms
- Never disclose WCG confidential information or that of our employees, clients, suppliers, or other business partners
- Never create the impression that our individual opinions are those of WCG
- Ensure that time and effort spent on social media does not interfere with our job responsibilities

## Human Rights

WCG requires its employees, suppliers, and other business partners to uphold the highest level of integrity regarding human rights. This includes the prohibition of human trafficking, forced labor (including prison labor), and child labor. This also includes compliance with all laws related to creating a respectful workplace (preventing verbal abuse, threats, harassment, public shaming, intimidation, and mental or physical coercion), equal opportunity and non-discrimination, work hours and rest periods, wages and benefits, clear employment expectations and arrangements, access to identification or other personal documents, access to housing and transportation accommodations (when provided), sanitary and safe working conditions, complaint procedures, and the right to freely associate and engage in collective bargaining.

## External Communications

Our customers, consumers, investors, industry analysts, journalists, public interest groups and others deserve accurate, clear, complete, and consistent communications from WCG. Since these interactions require careful consideration and an expert understanding of legal, financial, and media issues, only designated WCG spokespersons are authorized to speak on the company's behalf. If you receive an inquiry from outside the company and are not authorized to respond, you should refer all media-related inquiries to the WCG Chief Marketing Officer.

# PROTECTING OUR INTEGRITY

## Open Door Policy

WCG is committed to a work environment where everyone's voice is heard, issues are promptly raised and resolved, and communication flows across all levels. Openness is essential for quickly resolving customer concerns, recognizing business issues as they arise, and addressing the changing needs of our diverse workforce. If any area of work is causing concern, the employee has the responsibility to address the concern with a manager. Whether a problem, complaint, suggestion, or observation, every WCG manager is expected to listen and help provide a solution or clarification.

## Investigations

We immediately report any suspected or known violation of this Code, company policy or law. There are multiple avenues employees can choose—from your manager to your HR representative to Legal or to the Compliance Department. In addition, the Company has a hotline where you can anonymously report issues 24/7 via [www.lighthouse-services.com/wcgclinical](http://www.lighthouse-services.com/wcgclinical).

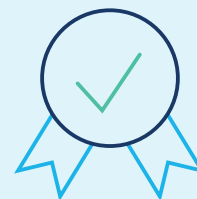
Protecting our reputation and acting in accordance with laws sometimes requires investigations into alleged violations of company policies and the law. WCG takes all reports made in good faith seriously and ensures that the right teams investigate the matter promptly, fairly, and confidentially. We conduct investigations professionally and strive to arrive at a fact-based outcome that prioritizes respect, fairness, objectivity, discretion, and quality. WCG employees have an obligation to cooperate in any company investigation or audit.

WCG takes appropriate action at the conclusion of an investigation. Violations of this Code, company policy, or applicable law will result in discipline, up to and including termination of employment, as is consistent with applicable labor laws.

WCG has a zero-tolerance policy on retaliation. We do not retaliate against any employee who raises an allegation of wrongdoing in good faith and we do not retaliate against any employee who cooperates in a Company investigation. Nothing in this Code should prevent you from reporting any concerns to a regulatory body, or from cooperating with any law enforcement investigation.

## Conclusion

At WCG, our Values demand a commitment to ethical behavior that goes beyond the letter of the law. WCG is driven to excellence and impassioned to do what is right. Our Code should help guide your conduct. However, many of the principles described in this Code are general in nature, and this Code does not cover every situation that may arise. If you have any questions about applying our Code, it is your responsibility to seek guidance. If you see something that is not right or ethical – speak up! The commitment to follow this Code starts with you.





WCG is a global leader of solutions that measurably improve and accelerate clinical research. Biopharmaceutical and medical device companies, contract research organizations (CROs), research institutions, and sites partner with us for our unmatched expertise, data intelligence, and purpose-built technology to make informed decisions and optimize study outcomes, while maintaining the highest standards of human participant protection. WCG raises the bar by pioneering new concepts, reimagining processes, fostering compliance and safety, and empowering those who perform clinical trials to accelerate the delivery of medical therapies and devices that improve lives. For more information, please visit [wgcclinical.com](http://wgcclinical.com) or follow us on Twitter @WCGClinical or LinkedIn.

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