



# Code of Business Conduct

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## A MESSAGE FROM OUR CEO

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 set of guidelines, but a living promise to act with integrity as we work to fulfill our mission. I ask every member of the WCG family to dedicate yourself to following this Code and personally implementing it in all your daily business activities.

In a rapidly evolving business and technological landscape, our Code has been updated to address new ethical challenges—including those posed by advancements in artificial intelligence (AI) and a changing global regulatory environment. 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 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

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.

We believe in clear, accessible policies. The principles in our Code are plain-language and actionable, with real-world examples and resources. Our goal is for everyone to understand and apply this Code with confidence, regardless of location or role.

This Code applies to everyone at WCG – employees, contractors, leaders, and partners – across all geographies and business units.

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.

## OUR PURPOSE

Our reputation for integrity and ethical excellence enables our mission to provide the people who perform clinical trials with the highest quality of services to accelerate the scientific advancement of human health, while ensuring that the risks of progress never outweigh the value of human life. We accomplish our mission by:

- Empowering our clients to make distinctive, lasting, and substantial improvements in the performance of clinical trials.
- Exceeding traditional standards of ethics, quality, and regulatory compliance, and inspiring others to do the same.
- Driving the industry to adopt innovative processes that improve the protection of research subjects.
- Building a world-class organization that attracts, develops, excites, and retains exceptional people.

## OUR VALUES

How we run our business is just as crucial as the results we achieve. Our shared Values shape how we work with each other, our customers, and our communities. They reflect what is most important to us as an organization. They serve as the foundation of our culture and the Code and help guide behavior and decision making across WCG. Wherever we work or operate, each one of us represents WCG. Each of us is the face of the Company in our local communities. Living the Values every day and following the Code sets us apart from other companies and ensures performance that will protect and expand our success.

- **Client-centricity.** We aim to delight with passion and commitment.
- **Leadership.** We lead with courage and innovation to shape our future.
- **Integrity.** We simply do the right thing and are honest, ethical, and trustworthy.
- **Results.** We are determined to deliver with accountability and quality.
- **Collaboration.** Together, we make the difference with inclusion and care for our customers, our teams, and our communities.

## WHO WE SERVE

WCG connects and partners with all major stakeholders in the clinical trials ecosystem, including:

- 5,000+ biopharma and CRO clients (including 50 of 50 top pharma and 8 of 8 top CROs).
- 3,400+ institutions and academic medical centers.
- 250,000+ global investigators.
- 300,000+ global research sites.
- 80,000+ clinical research coordinators.
- 2,500,000+ participants in WCG-supported studies.
- 100+ patients advocacy groups.

# OUR RESPONSIBILITIES

We are all responsible for understanding and following the Code.

## Making Ethical Decisions

When contemplating anything from sending a text message to making a large financial decision, use the headline test. You must be able to answer each of these questions, “Yes!!”

- Is the action legal?
- Is the action ethical?
- Does the action comply with our values?
- Does the action comply with this Code and our policies?
- Would you be OK if a story about the action turned into a headline?

**If the answer to any of these questions is no, stop and talk to your manager.**

## Speaking Up and Seeking Help

An open culture that encourages us to voice our opinions and concerns helps us capture great ideas and mitigate risks. When people speak up, we innovate and improve.

We must seek advice when we're unsure about the proper course of action. We also are required to speak up immediately if we see something that violates – or could violate – the law or the Code. If something does not feel right, we must take action to ensure that we maintain our standards.

## No Tolerance for Retaliation

WCG will not tolerate retaliation against anyone who, in good faith, raises a question or concern about a potential violation of the Code or potential non-compliance with applicable laws or regulations. Retaliation in any form – threats, harassment, intimidation, violence, reassignment, demotion, or firing – has no place in our organization.

## Resources

There are many resources for asking questions, seeking guidance, raising concerns, or reporting suspected or actual violations. Supervisors and managers are the best initial source.

You may also seek help from:

- Leadership of any Level
- Human Resources
- Compliance Department
- Legal Department
- Ethics Help Line (including online and anonymous reporting)
  - <https://report.syntrio.com/wcgclinical>
  - English Speaking USA and Canada: 833-930-0001
  - Spanish Speaking USA and Canada: 800-216-1288
  - French Speaking Canada: 855-725-0002
  - North American Reporters Speaking Languages Other than Spanish, English, and French: 844-301-0005
  - Email: [reports@syntrio.com](mailto:reports@syntrio.com) (must include company name with report)



## 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 represent WCG values and 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 on 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: <https://report.syntrio.com/wcgclinical>.
- By Toll Free Phone at:
  - English Speaking U.S and Canada: 833-930-0001
  - Spanish Speaking U.S. and Canada: 800-216-1288
  - French Speaking Canada: 855-725-0002
  - North American Reporters Speaking Languages Other than Spanish, English, and French: 844-301-0005
- By E-mail: [reports@syntrio.com](mailto:reports@syntrio.com)  
(Must include company name with report.)



# OUR PEOPLE

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

## Culture

At WCG, we are committed to fostering a “One WCG” culture where inclusivity, respect, value, and empowerment are at the heart of every endeavor, ensuring that each day we advance clinical research together. Our “One WCG” culture is 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 inclusiveness 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.

WCG’s Culture Curator Committee is a strategic initiative designed to strengthen WCG’s “One WCG” culture by embedding inclusivity, respect, value, and empowerment into daily practices through a dedicated group of employee ambassadors. These ambassadors, partner with WCG leadership to promote core values, foster belonging, and enhance the overall employee experience.

## 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.

## 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.

## 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.

## COMPETING FAIRLY

We deal fairly and honestly with our clients, suppliers, business partners, and competitors. Consult the Legal Department before considering any type of agreement or understanding that might appear to limit any party's freedom to conduct business with others or to conduct business in a particular geographic area.

### Fair Dealing

While we compete aggressively for new business, relationships with our business partners are built upon trust and mutual benefits. We never:

- Mislead anyone about our products or services through our marketing materials
- Use a competitor's trade secret or other confidential business information to our advantage
- Engage in unauthorized use, copying, distribution, or alteration of software or other intellectual property
- Agree on pricing with our competitors
- Engage in bid rigging with our competitors
- Agree to allocate markets or customers with our competitors
- Agree to boycott a supplier or customer with our competitors

### Conflicts of Interest

Allowing personal interests, relationships, or activities outside of work to interfere with our jobs or our ability to make objective business decisions for the good of WCG is a conflict of interest. Such conflicts must be avoided because they can harm our effectiveness as well as our reputation for integrity. A loss to the company need not occur for a conflict to exist. Even the appearance of a conflict of interest can create risk. Many conflicts of interest can be avoided or addressed if promptly disclosed and effectively managed. This section provides guidance on some of the more common conflicts of interest, but it cannot cover every situation we may face. Consult the Employee Handbook, or the Compliance Department or Legal Department for help navigating potential conflicts.

### Conflict of Interest Quick Test

1. Will you feel obligated to someone else?
2. Could you or someone close to you financially benefit from a WCG transaction?
3. Could anyone perceive that you are engaging in favoritism as it relates to an employee, vendor, or supplier due to your personal relationships?
4. Could your position outside WCG interfere with or influence any business decision?
5. Could your personal or familial relationships cause anyone to question your duty of loyalty to WCG?
6. Could your independent judgment be compromised?

If you answer "yes" to any of these questions, a real or perceived conflict of interest may exist. Immediately seek guidance from a manager or the Compliance Department.

## Conflicts of Interest General Guidance:

- Never personally benefit from a WCG or client transaction or use WCG assets for personal gain.
- Avoid situations where interests of family members may be at odds with WCG.
- Avoid secondary employment that may negatively impact your job performance – employees are not permitted to seek secondary employment without prior approval from your manager and HR – if the proposed employment is with any WCG competitor, client, supplier, or partner, then seek prior written approval from the Legal Department.
- Never accept gifts (beyond common nominal courtesies) from anyone WCG does or is considering doing business with.
- Never manage any business relationship where the business partner employs someone with whom you have a personal relationship.
- Recuse yourself from employment decisions (including interviewing, hiring, promoting, or disciplining) that involve anyone with whom you have a close personal or family relationship
- Never supervise, directly or indirectly, anyone with whom you have a personal relationship.
- Obtain prior approval from the Legal Department before serving on any board or advisory board of any for-profit organization.
- Promptly disclose any personal interests, relationships, or activities that could, or appear to, conflict with WCG's interests to the Compliance Department

## Fighting Corruption

We do not bribe anyone, ever. We do not offer, promise, provide, solicit, or accept anything of value on WCG's behalf or in connection with WCG's business. We do not engage in any form of bribery, kickbacks, corruption, facilitation or "grease" payments, extortion, or embezzlement. We do not hire a third party to engage in any corrupt behavior on WCG's behalf. Put simply: bribes are illegal, unethical, and prohibited by this Code. Please carefully review WCG's Anti-bribery Anti-corruption Anti-kickback and Anti-human trafficking Policy for more information about your role in fighting corruption in all our business practices.

## Business Courtesies

We understand the value in using gifts, meals, 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, or suppliers/vendors (beyond common nominal courtesies as noted above) at any time.

## Insider Trading

You may learn material non-public information about a competitor, client, supplier, or business partner in your role at WCG. Material non-public information may include plans for mergers or acquisitions, marketing strategies, clinical trial results, financial results, or other business dealings that are not publicly available. You are prohibited from trading securities of a publicly held company or influencing others (including family members and friends) to trade securities based on material non-public information. If you have access to unblinded clinical trial data through your duties at WCG, you are prohibited from purchasing stocks in clinical pharmaceutical and device companies. In addition, you must report your conflicts of interest once a year and update your status when it changes. Criminal and civil penalties for violating securities laws and engaging in insider trading are severe. If you have a question, contact the Legal Department.

## Anti-Money Laundering

We are committed to fully complying with all applicable anti-money laundering and terrorist finance laws, rules, and regulations. You must not participate in or facilitate money laundering; doing so, even unintentionally, could result in civil and criminal penalties against you and WCG.

## 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

## Engaging with Third Parties

We select our business partners with care, recognizing that our reputation is shaped by those we choose to work with. When engaging with a vendor, supplier, or other third party, you must ensure they have a solid market reputation, are qualified for the services they provide, and are compensated at fair market value. Sustainable suppliers are our partners in advancing responsible business practices, helping us reduce environmental impact, uphold ethical standards, and drive long-term value across the clinical research ecosystem. In addition, we prioritize partners who demonstrate a commitment to sustainable and ethical practices, including environmental responsibility and social accountability. Any concerns or red flags—whether related to qualifications, conduct, or sustainability—must be reported to the Compliance Department immediately.

## 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 the company's behalf or in the 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

You should keep your political activities separate from your work for WCG. 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 currently make corporate contributions to any political party or representative, and if it decides to do so in the future any contribution must be approved by the Chief Executive Officer and Chief Legal Officer.



## 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, the Compliance 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:

- Follow policies for responsible use of all assets
  - 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.

WCG is entrusted with sensitive and proprietary information from our customers, partners, and stakeholders. We protect this intellectual property with the highest level of care. Every individual working on behalf of WCG is responsible for safeguarding this information, reporting any suspected misuse immediately, and following all applicable policies, procedures, and legal obligations. Maintaining strict protection of customer intellectual property is essential to preserving trust, supporting ethical research, and upholding WCG's integrity.

## Responsible Use of Technology and Artificial Intelligence (AI)

At WCG, we recognize the transformative potential of technology and artificial intelligence (AI) in advancing clinical research and improving human health. We are committed to using these tools responsibly and ethically, in alignment with our values of integrity, transparency, and respect for privacy and individual rights. Employees are expected to ensure that AI applications are fair, transparent, and free from bias, with decision-making processes that are explainable and accountable.

Sensitive data must always be protected, with strict adherence to privacy laws and internal governance policies. These efforts are supported by WCG's AI Working Committee, which provides oversight and guidance on ethical AI deployment. Through these principles, WCG affirms its dedication to innovation that promotes trust, safeguards individual dignity, and upholds the integrity of clinical research.

## 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 Standard Operating Procedures.

## 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 Responsibly

WCG's information and communications systems are critical to our mission. Our information and communications equipment and systems include 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

## Environmental Sustainability

WCG Clinical is committed to promoting environmental sustainability across all areas of our operations. We comply with applicable environmental laws and have approved near- and long-term science-based emissions reduction targets through the Science-Based Targets initiative (SBTi). Our goal is to minimize our carbon footprint by integrating energy-efficient technologies, reducing resource consumption, and implementing waste management strategies that prioritize minimization, reuse, recovery, and recycling. Decarbonization strengthens our business by reducing long-term operational risks, improving energy efficiency, aligning with regulatory and stakeholder expectations, and enhancing our reputation as a responsible leader in clinical research. We also participate in globally recognized sustainability assessments, including EcoVadis and CDP, to benchmark our progress and reinforce our commitment to transparency and continuous improvement.

## Sustainable Supply Chain

We extend our sustainability commitment to our supply chain. Our Supplier Engagement Program includes sustainability training for our supply partners. We also consider environmental impact in procurement decisions, favoring energy-efficient and sustainable products and services. Sustainable suppliers are our partners in advancing responsible business practices, helping us reduce environmental impact, upholding ethical standards, and driving long-term value across the clinical research ecosystem.

## 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 <https://report.syntrio.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 call for a commitment to ethical behavior that goes beyond mere legal compliance. We are driven by a passion for excellence and a deep responsibility to do what is right. While our Code of Conduct provides guidance, it cannot anticipate every situation. Instead, it serves as a practical, evolving framework to support ethical decision-making in our daily work.

We aim not only to meet compliance standards but to foster a culture where values shape choices at every level. Every employee is empowered—and expected—to contribute to an environment that is ethical, inclusive, and innovative. Through shared accountability and leadership, we uphold WCG's integrity and mission.

If you have questions about applying the Code, it is your responsibility to seek guidance. When something does not seem right or ethical—speak up. Upholding our standards begins with each of us. Your commitment to integrity strengthens WCG's reputation for excellence. When in doubt, ask questions. Together, we ensure our values are reflected in every decision we make.





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](https://wgcclinical.com) or follow us on LinkedIn or X @WCGClinical.

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