



Code of Conduct

Updated: August 30, 2021

Our Code of Conduct

At Advarra, we seek to accelerate the advancement of human health. As we pursue our mission and vision, we are guided in our behavior by our core values: Patient-Centric, Ethical, Collaborative, Quality-Focused. These values define what we believe in and how we act toward our colleagues, customers, suppliers, and other stakeholders.

The Advarra Code of Conduct outlines how we operate, internally and externally, and provides guidance on how we make ethical decisions in all that we do. All Advarra colleagues are responsible for upholding our Code of Conduct and are encouraged to bring forward any questions or concerns.



Table of Contents

Using Our Code of Conduct

Using Our Code of Conduct	4
Expectations Regarding the Code	5
Decision-Making Framework	6

How We Conduct Business

How We Conduct Business	8
Company Standards and Policies	9
Our Compliance Program	10

Resources

How to Report a Potential Code Violation	16
Employee Contacts and Resources	17

Our Role in the Industry

Our Role in the Industry	7
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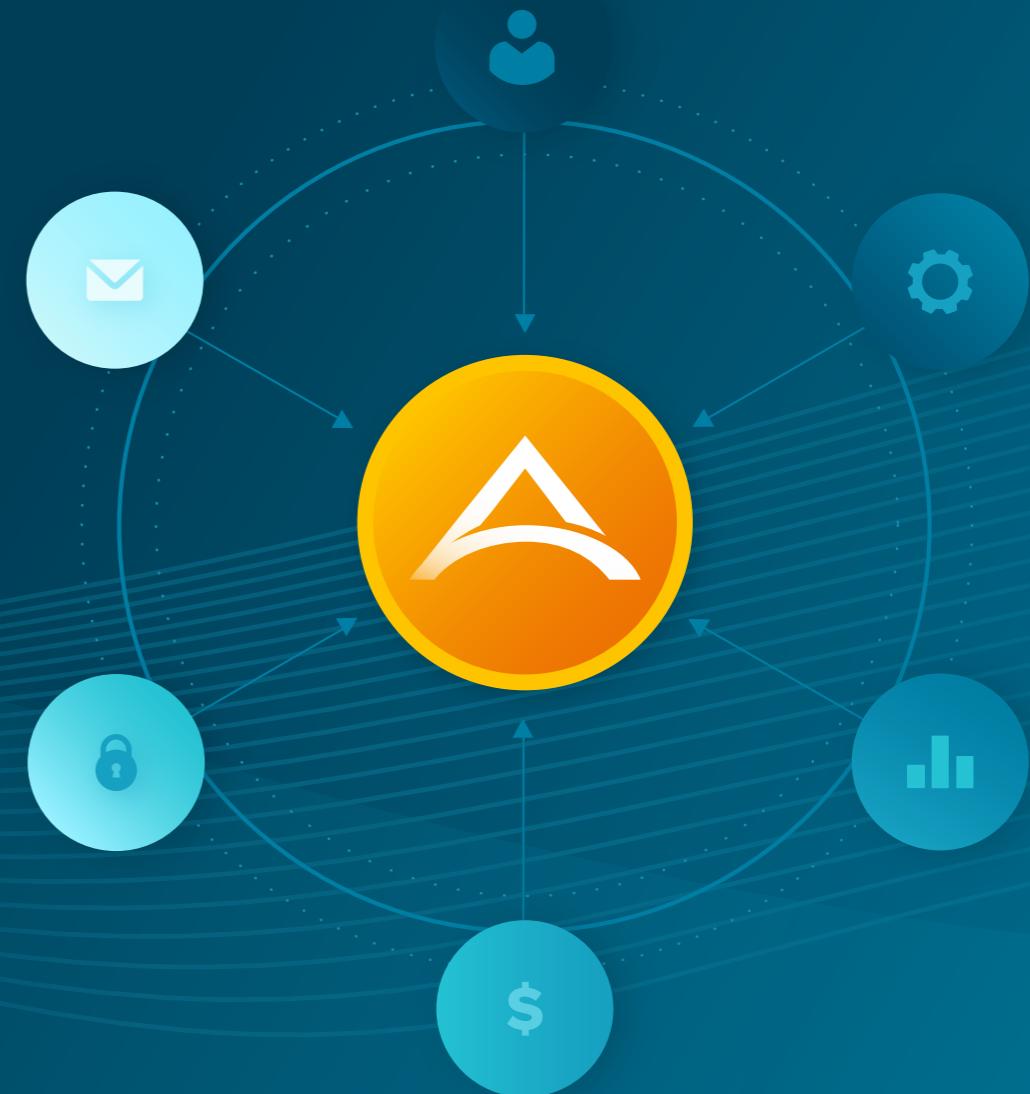
How We Work Together

How We Work Together	11
Pledge to Our Employees	12
Pledge to Our Applicants	13
Code of Conduct in Action	14

Using Our Code of Conduct

To maintain and protect our reputation as a company with an open and honest environment that operates ethically and with integrity, it is important to comply with this Code of Conduct (also referred to as the Code). An essential resource for all Advarra employees, this document outlines the company's expectations with respect to our values, while guiding employees in their decision-making and identifying channels for asking questions and raising concerns.

The company standards apply to everyone who works on behalf of Advarra.



Expectations Regarding the Code

For Employees

- Read and understand the Code
- Follow the Code and any applicable laws
- Use the [Decision-Making Framework](#) for guidance
- Model the Code for your colleagues
- Report any conduct that violates our Code of Conduct or other Advarra policies
- Ask for help when questions arise

For Managers

- Model the behaviors in the Code
- Be a resource for employees regarding standards as well as resources
- Cultivate the right environment to encourage speaking up about violations

Decision-Making Framework

When faced with a decision, ask yourself the following questions:

- Does it follow our Code of Conduct?
- Is it aligned with our values and expectations?
- Does it meet regulations and laws?
- Does it follow our policies and standards, as outlined in the Advarra Employee Handbook?
- Would I be comfortable if my actions were made public?

If you answered **"Yes"** to the above questions, you have made an ethical decision. If you answered **"No"** to any of the above questions or are unsure, you should reach out for advice, talk to your manager, or follow the Advarra options for reporting a concern (see [Resources](#)).

Our Role in the Industry

Integrity and ethical standards are the foundation of Advarra. The company acts to uphold research fidelity, instill transparency, and serve as a beacon of ethical guidance for the research community. Advarra is accountable to all stakeholders, clients, and partners to produce trustworthy products and services.

As such, Advarra prioritizes our credibility as an ethical and reliable company in all services. By expecting the highest ethical behaviors from ourselves, starting at the individual level with our employees, we produce services and products that live up to our reputation as leaders in ethical guidance for the industry.



How We Conduct Business

At Advarra, we conduct business in compliance with all appropriate laws and regulations. In order to protect our company, our assets, and our partners, all employees should follow the Advarra Employee Handbook and utilize the [Advarra Compliance Program](#). Advarra has outlined detailed policies, procedures and training to aid employees in complying with legal and ethical conduct. The policies Advarra adheres to not only promotes transparency and integrity within the company, but also projects transparency and integrity to our partners.

Following is a summary of key policies.

Employees: See the Advarra Employee Handbook for all company standards and policies.



Company Standards and Policies

We have the duty to **safeguard company assets**. We act to protect our confidential and proprietary information, our data, and our intellectual property. We focus on **accurate record keeping**, making sure all data is up-to-date, gathered ethically, and stored safely.

We **utilize technology appropriately and professionally**. This applies not only to storing data properly, but also to using social media responsibly. Unless social media is used for an approved company purpose, employees make clear that all opinions expressed on social media are their own and not representative of Advarra.

We follow financial, accounting, and **procurement standards** to ensure that we do not mislead investors, legislators, authorities, or the public about financial aspects of our company. Similarly, prioritizing trust and transparency with customers, we pledge to follow ethical **pricing** strategies.

We **treat suppliers fairly**. We follow set processes and procedures to ensure compliant procurement practices.

We do not partake in **insider trading**. We follow Advarra policy which prohibits the use or disclosure of acquired inside information during employment at Advarra.

We do not give or accept **gifts** that compromise our integrity. When giving or receiving a gift, one must consider whether that gift could be viewed as excessive or designed to influence or reward a particular course of action.

Advarra maintains a robust policy addressing employee apparent and actual **conflicts of interest (COIs)**. On an annual basis, each employee completes conflict of interest training and has a responsibility to disclose COIs on an annual basis or as they arise.

No **political activities** may be conducted on behalf of Advarra, in the name of Advarra, or with any representation of support from Advarra. The company does not make political contributions to any organizations or individuals. Advarra values complete transparency and neutrality, operating as a non-partisan organization free from political affiliations.

The way we **communicate with the public** is crucial to building trust. Valuing transparency, Advarra is committed to delivering accurate and reliable information to the media, investors, and the public at large. All public disclosures and communications will be honest, timely, and representative of the facts, as well as uphold Advarra values and expectations. Only designated employees can speak on behalf of the company.

All **media inquiries** should be referred to mediarelations@advarra.com.

For more on company standards and policies, employees should reference The Advarra Employee Handbook. Employees can find the most recent Handbook in the appropriate country section on [Prism](#) (internal only).

Our Compliance Program

Advarra's Compliance Program is designed to support legal and ethical conduct throughout the company.

The Chief Compliance Officer oversees Advarra's Compliance Program and, with the Compliance Division, works to address risk areas and ensure adherence to our standards.

The Compliance Division is responsible for investigating compliance issues and ensuring Advarra fulfills its obligations, including required training, reporting, and monitoring.

Our Compliance Program ensures the company follows all rules and regulations while instilling confidence in the business's integrity.

Email: corporatecompliance@advarra.com

How We Work Together

We expect our employees to act with integrity in all they do. In turn, Advarra treats our employees with open and honest respect while providing a safe and healthy work environment for all.

We believe that providing a work environment based on respect, trust, and collaboration creates an exceptional employee experience where employees can bring their whole and authentic selves to work and thrive in their careers.

Bringing together different abilities, experiences, and characteristics are key in producing the best work possible. We should respect our differences and embrace individuality and diversity, harnessing them to achieve great things.



Pledge to Our Employees

At Advarra, we treat everyone with respect. Advarra promotes a work environment free of any form of harassment. We do not tolerate abusive behavior in the workplace. This includes any unwelcome comments or actions.

Our purpose is to help people do more, feel better, and live longer, including ourselves. Our greatest asset is our people. As such, Advarra is committed to the well being and overall health of our employees. By providing benefits, as well as creating optimal working environments, we invest in our employees to produce happy and healthy workers.

Managers are responsible for maintaining a work environment that is free of harassment, discrimination, and bullying.

Advarra is committed to providing an environment that is free of retaliation. Advarra's [Whistleblower Policy](#) is intended to encourage and enable team members to raise serious concerns internally so Advarra can address and correct inappropriate conduct and actions. Advarra designed this procedure to enable all team members to report serious and sensitive issues relating to financial reporting, unethical or illegal conduct, or violations of Advarra's Employee Handbook and Code of Conduct.

See [Resources](#) for how to report a violation or concern.



Pledge to Our Applicants

Advarra is an Equal Opportunity Employer.

[Please see our Careers page to learn more](#)

Code of Conduct in Action

Example of issues that may arise and what to do:

Q: I saw a co-worker doing something unethical. Should I report them? I am worried I will get in trouble.

A: If you see something, you should always say something. You will not get in trouble or face retaliation by making a report, and investigations are confidential.

Q: I have a concern, but I do not see it covered in the Code of Conduct or addressed in the Employee Handbook. What should I do?

A: The Code of Conduct cannot address every possible ethical situation. You should use the [Decision-Making Framework](#) to help guide your response. You could also raise the concern to your manager, Human Resources, or Compliance to get advice as to how best to proceed.

Q: One of my co-workers repeatedly makes comments about my sexual orientation, despite being asked to stop. What should I do?

A: Report it using the channels outlined in [Resources](#). Advarra seeks to promote an inclusive and safe work environment.

Q: I received a gift from a client. Can I accept it, or will it be seen as a bribe?

A: Before offering or accepting anything, make sure it fits within our policy, is normal in business relationships, and is unlikely to influence decision-making.

Q: I overheard my co-worker sharing confidential client data with another client. What should I do?

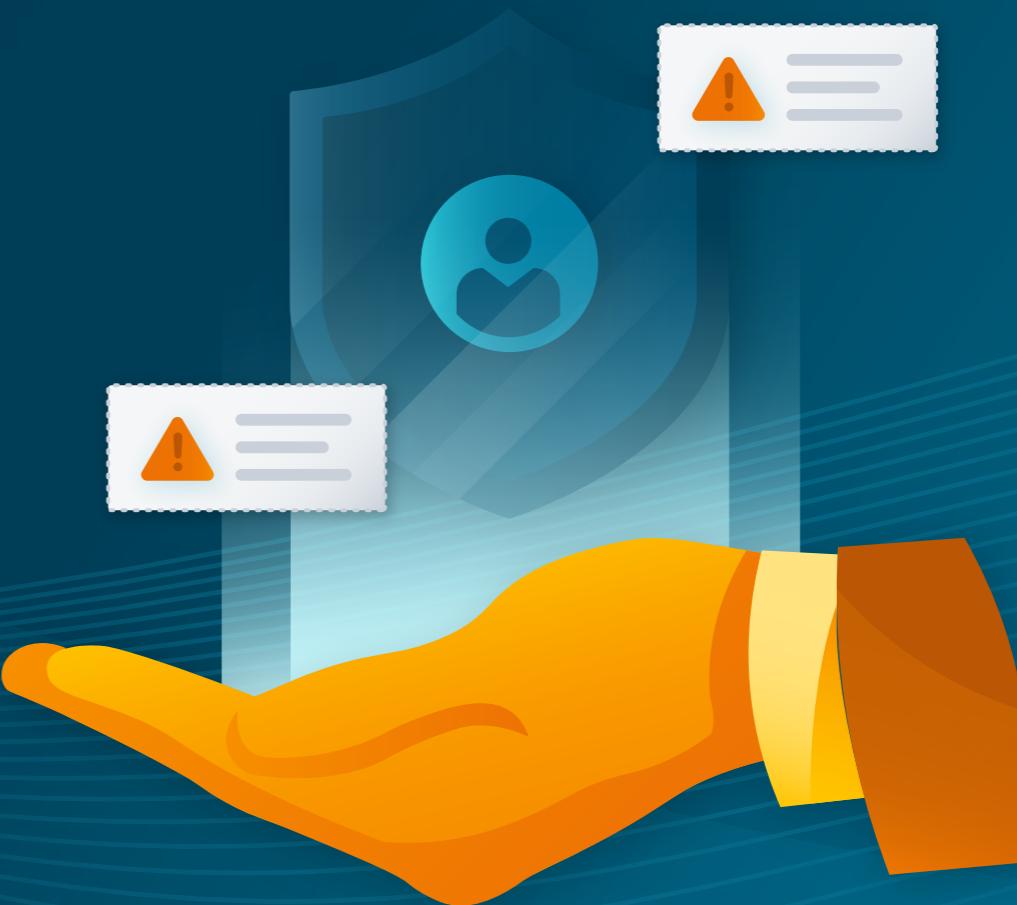
A: Report it. Client data is confidential and must not be shared.

Q: When discussing a candidate after an interview, my manager recommended not hiring the person due to a disability. Should I report it, even though the candidate doesn't work here?

A: Yes. Equal Employment Opportunity is the law. A candidate considered for employment should be evaluated based on their professional competencies.

Resources

Our Code provides an overview of standards regarding conduct and decision making, but does not cover every possible scenario. Should you have a question or concern, we encourage you to use the available resources found in this section.



How to Report a Potential Code Violation

Advarra's Whistleblower Policy is intended to encourage and enable team members to raise serious concerns internally so Advarra can address and correct inappropriate conduct and actions. It is the responsibility of all team members to report ethical concerns or violations or suspected violations of law or regulations that govern Advarra's operations.

Employees can make a confidential or anonymous report to the appropriate Advarra managers, Human Resources team, the Chief Executive Office, Chief Financial Officer, Chief Compliance Officer, or through the company's confidential, external reporting service.

Employees may find the information on the reporting hotline on [Prism](#) (internal use only) by searching Global Reporting Hotline.

Employee Contacts and Resources

Advarra has many resources to support employees:

Managers and Senior Leadership—As role models for proper behavior, managers are available to answer questions and be a resource. Reach out to your manager if you have any concerns or questions.

Compliance Division—Supporting legal and ethical conduct throughout the company, Compliance is a valuable resource to ensure Advarra lives up to its standards of ethical conduct and should be contacted with any compliance questions:

corporatecompliance@advarra.com

Human Resources—Our Human Resources (HR) department is available to answer questions, listen to concerns, and direct employees to the appropriate resources. Employees, please contact your HR business partner. See the HR page on [Prism](#) (internal only).

Employee Handbook—The Advarra Employee Handbook is the primary source of information on current company policies and standards. Employees can find the most recent Handbook in the appropriate country section on [Prism](#) (internal only).

Refer all **media inquiries** to mediarelations@advarra.com