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ANTI-CORRUPTION **COMPLIANCE POLICY**

PPD Policy No. 10-103r04 Effective Date: 1 January 2020

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THIS POLICY **OUTLINES**

and defines PPD's requirements and expectations regarding **BRIBERY** and **CORRUPTION**

It is designed to aid you in recognizing potential bribery and corruption, to help you to act lawfully and ethically at all times, and to provide you the tools you need to ask questions and raise concerns.

LETTER FROM OUR CHAIRMAN AND CHIEF EXECUTIVE OFFICER

Dear Fellow Employees and Directors:

PPD's reputation and strong foundation are built on an unwavering commitment to lawful and ethical behavior. This commitment serves as a cornerstone for our business operations around the world and is vital to our continued success as a leading global contract research organization.

DAVID SIMMONS
CHAIRMAN AND CHIEF EXECUTIVE OFFICER

A key aspect of this commitment is our zero-tolerance for bribery and corruption in all forms. Our anti-corruption compliance policy and our code of conduct provide the essential components of PPD's compliance program, which is based on one of our defining principles: we do the right thing. The key premise within both the Policy and the Code is essentially the same: the importance of holding ourselves to high ethical and legal standards in the conduct of our daily work.

This Policy outlines and defines PPD's requirements and expectations regarding bribery and corruption. It offers examples to assist you in your understanding. It is designed to aid you in recognizing potential bribery and corruption, to help you to act lawfully and ethically at all times, and to provide you the tools you need to ask questions and raise concerns.

It is the responsibility of each of us to know and understand this Policy and the importance of complying with all applicable laws and regulations.

Thank you for your continued commitment to PPD. I encourage you to be proud of the work you do and to continue to hold yourself to high ethical standards.

David Simmons
Chairman and Chief Executive Officer, PPD

AN INTRODUCTION TO THIS POLICY

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WHAT IS OUR COMMITMENT?

PPD takes a zero-tolerance approach to **BRIBERY** and **CORRUPTION.** We are committed to ethical and lawful behavior, and to acting professionally and fairly in all business dealings and relationships. We seek to maintain high ethical standards and to comply with all applicable laws and regulations.

Our principles guide us: **WE DO THE RIGHT THING.**

WHY DO WE HAVE THIS POLICY?

Our company's reputation depends on all of us operating with the highest ethical standards and in compliance with all applicable laws, whatever our job or location.

This Policy specifically focuses on our compliance with the anti-corruption and bribery laws that govern our work. It sets out our commitment to maintaining lawful, ethical business relationships and offers detail and examples relevant to our business.

It will help you identify potential issues and give you the information you need in order to resolve an issue, ask a question or escalate a concern.

WHAT IS **BRIBERY?**

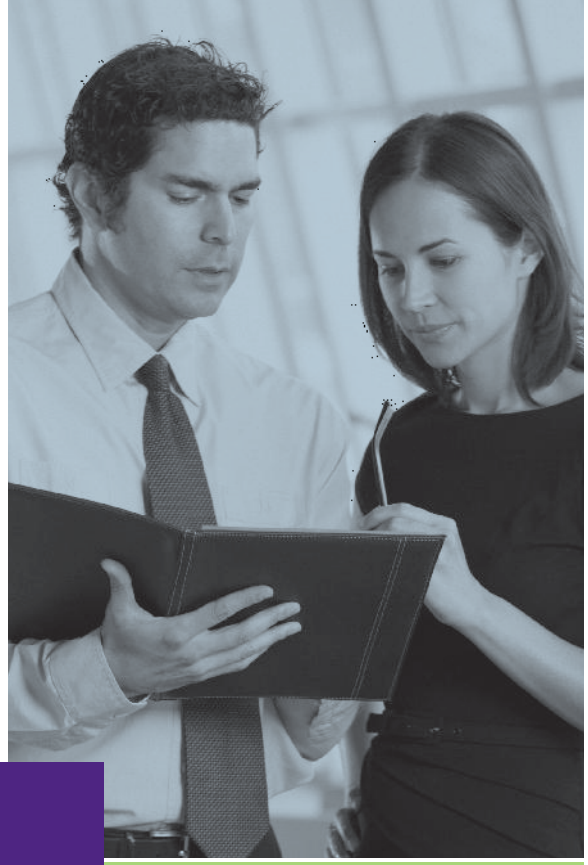
A bribe is when one person gives or promises to give anything of value to another person with the intention of gaining an improper advantage.

WHAT IS **CORRUPTION?**

Corruption is dishonest, illegal or immoral behavior, involving someone in a position of power or authority.

WHAT IS **INTEGRITY?**

Integrity means always acting in an honest manner, in compliance with the law and in accordance with high ethical standards and the principles set out in the PPD Code of Conduct and this Policy.



The prevention, detection, reporting and investigation of bribery are responsibilities shared by all of us.

WHO DOES THIS POLICY APPLY TO?

This Policy is mandatory for all of us at PPD. It applies to all our business activities globally.

It applies to all individuals working at all levels throughout our global organization, including members of our board of directors, officers, employees (whether permanent, fixed-term or temporary), contractors, home-based workers, casual workers and agency staff, freelancers, contingent labor, volunteers and interns. In this Policy, we refer to this group of people as **PPD PERSONNEL.**

However, this policy also applies to all third parties acting for or on behalf of PPD or our clients, such as vendors, suppliers, subcontractors, joint-venture partners, agents, consultants and other representatives. We refer to these individuals and entities as our **BUSINESS PARTNERS.**

HOW DO WE COMPLY WITH THIS POLICY?

It is important that we each take the time to read this Policy, ensure that we understand it and comply with it at all times. This Policy details how we can ask questions, seek help and report details of suspected bribery.

All PPD personnel are required to train on this Policy annually. This includes reading and confirming compliance with the Policy. Employees in certain countries or carrying out certain functions may be required to complete additional training and/or further certifications.

how we can ask questions, seek help and report details of suspected bribery.

WHAT HAPPENS IF WE DO NOT COMPLY?

Any act of bribery has very serious consequences for the individual involved, the company and any person who authorized or even knew about the bribery.

+ FOR AN INDIVIDUAL – An employee, director or officer of PPD could be prosecuted in the country where the bribe took place, and also possibly in the U.S. and the U.K. Significant fines and imprisonment are possible. These fines would not be reimbursed and cannot be insured. Any employee who does not follow this Policy will be subject to disciplinary action, which may include termination of employment.
+ FOR PPD – In the U.S., the company could be subject to significant fines in respect of each violation, as well as debarment from government contracts. Further penalties could be imposed on other PPD group companies, such as "parent" companies in the U.S. and the U.K..
+ FOR OUR BUSINESS PARTNERS – it is highly likely that PPD would stop doing business with any business partner involved in bribery. The business partner itself and its employees, directors and officers could also be subject to the consequences listed above.
+ FOR THOSE WHO AUTHORIZED OR KNEW ABOUT BRIBERY – Remember, you do not have to make or receive a bribe to violate the law and this Policy. If you know, should know or even suspect bribery has taken place, you are also at risk.

WHAT HAPPENS IF WE COMPLY, BUT WE LOSE BUSINESS?

It is extremely important that we all comply with this Policy. We should not be misguided by any sense of loyalty to PPD or a desire for extra business or profitability.

It is never acceptable to disobey any applicable law, this Policy or any other company policy to try to help PPD get ahead.

No employee, officer or director will be disadvantaged for refusing to take part in any activity that would violate this policy, even if we lose business as a result.

WE ALL COMPLY **WITH THIS POLICY**

No employee, officer or director will be disadvantaged for refusing to take part in any activity that would violate this policy, even if we lose business as a result.

HOW CAN WE ASK QUESTIONS, REPORT CONCERNS AND GET MORE INFORMATION?

Asking questions, reporting concerns and getting more information are crucial to upholding our anti-corruption commitment. If you would like to talk to someone about these issues, please contact any of the following resources:

- The corporate legal contact
- The company's general counsel
- The chief accounting officer
- The designee(s) of the general counsel or chief accounting officer

If you believe your questions or concerns cannot be addressed by these means, or you do not feel comfortable reaching out to these resources, you may contact the PPD Code of Conduct hotline or send an email, as follows:

- **Call the Code of Conduct hotline:**
  - In the U.S. and Canada, dial +1 888 898 4087
  - For everywhere else, dial +1 770 613 6324
- **Email:** *Corporate.Compliance@ppdi.com*

The hotline is answered by an independent service that will treat all calls confidentially, as allowed by applicable law. Also, if requested and allowed by applicable law, you may make your report anonymously. Our Policy Prohibiting Retaliation states that you cannot be treated in a negative way – such as being fired or disciplined – if you lawfully and in good faith report a suspected crime or a violation of law or policy or if you help in the investigation of such a suspected crime or violation.

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OUR POLICY ON CORRUPTION

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WHAT IS "ANYTHING OF VALUE"?

A bribe can be cash or a gift, or it can be anything else that is of value to the recipient, such as a voucher or gift card, donation to a charity of their choice, scholarship, loan, forgiving a debt, providing a discount, employing a family member or providing use of a company facility or property. These can all be bribes, if they are given with an improper intent. It doesn't matter if they are given directly, or through a third party.

WHAT IS PPD'S POLICY?

We do not engage in or condone any acts of corruption or bribery.

WHAT DOES THIS MEAN?

We may not offer or allow **ANYTHING OF VALUE** to be given on behalf of PPD in order to gain an **IMPROPER ADVANTAGE.** We may not ask for or accept **ANYTHING OF VALUE** that we know or suspect is being offered in order to obtain an **IMPROPER ADVANTAGE** from PPD.

This Policy covers all interactions between **PPD PERSONNEL** and:

+ GOVERNMENT OFFICIALS
+ COMMERCIAL CONTACTS
+ INTERMEDIARIES

We must all take particular care regarding interactions with government officials.

DESIGNEES

Designees of the general counsel and chief accounting officer or any members of the legal or finance department (respectively) identified by the general counsel or chief accounting officer as their designee. In the case of the general counsel, the designee is typically the member of the legal team identified as holding relevant responsibility ***as outlined on the PPD intranet***

WHAT PAYMENTS ARE PERMITTED UNDER THIS POLICY?

It is just as important to know what we can do as it is to know what we cannot do. In general, the following actions are permitted:

+ Paying legitimate fees or necessary business expenses directly to a government body or to an employer entity.
+ Genuine commercial rebates and volume discounts offered to clients (provided that such rebates comply with other applicable laws; and that any rebates to clients that may be owned or controlled by governments [including state-owned enterprises] must be pre-authorized by the company's general counsel and chief accounting officer, or their respective designee[s]).
+ Extortion payments, which are payments you are forced to make to protect your safety. If you face an express or implied threat to your personal safety, you may make a payment that would otherwise be prohibited. However, you must always report this as quickly as possible to the general counsel. Any such payments will be recorded accurately by PPD as extortion payments.
+ Making any other type of payment to government officials or others that is expressly permitted by this Policy.

QUESTIONS?

What is an improper advantage? An improper advantage is something that we would not and should not otherwise have had (if we had acted properly), which benefits PPD or our clients. For example, it could be a contract award, an expedited regulatory approval, tax relief or goods passed through customs outside the normal customs process.

What is a government official? A government official can be:

+ Any officer or employee (at any level of seniority) of a government or any department, agency or instrument of a government
+ Any person acting in an official capacity for or on behalf of a government or any department, agency or instrument of a government
+ Any officer or employee of a company or business owned in whole or part by a government
+ Any officer or employee of a public international organization (see definition below)
+ Any officer or employee of a political party or any person acting in an official capacity on behalf of a political party
+ Any candidate for political office

It does not matter whether it is the U.S. government or the government of any other country. Also, please remember in many countries where we operate, hospitals are government-owned, and therefore doctors and other study-staff (employed by the hospital) are government officials.

QUESTIONS?

What is a public international organization? A public international organization includes such organizations as the United Nations, the World Bank, the International Monetary Fund, the Red Cross, the Asian Development Bank and the World Health Organization. Please contact the general counsel or his designee if you have a question as to whether a particular organization should be treated as a public international organization.

What is a commercial contact? A commercial contact is any person or organization you come into contact with during the course of your activities for PPD. This includes actual and potential clients, suppliers, vendors, subcontractors, health care providers and site staff.

What is an intermediary? An intermediary is any third party such as an agent or consultant who does something on behalf of the company—for example, a party who is responsible for making payments to governmental authorities in connection with obtaining permits or licenses. Use of intermediaries is common and can be entirely appropriate. The important thing is that intermediaries act on our behalf, so we may be considered to be responsible for their wrongdoing.

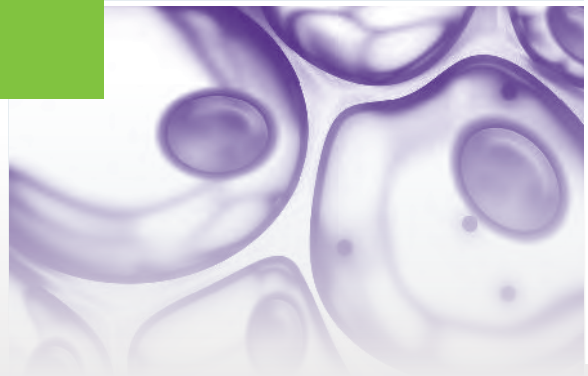
WHAT IF I AM ASKED TO MAKE A PAYMENT THAT COULD BE REGARDED AS A BRIBE?

There is no defense for making an improper payment. No matter who might ask us to make such a payment, or whether our competitors routinely make similar payments, we must always uphold this Policy and our Code of Conduct.

If you are not sure what to do in a particular situation, ask the ***corporate legal contact***, our general counsel and/or chief accounting officer or their respective designee(s) before proceeding. If someone has asked you to pay or authorize a bribe, or any payment that you think could be a bribe, you have a responsibility to report it to any of these individuals as well.

OFFERS OF AND REQUESTS FOR **IMPROPER PAYMENTS**

Offers of and requests for improper payments can arise in a number of ways. Sometimes, they can appear to be part of normal business, making them more difficult to identify.



FACILITATION PAYMENTS AND KICKBACKS

Offers of and requests for improper payments can arise in a number of ways. Sometimes, they can appear to be part of normal business, making them more difficult to identify. This situation commonly arises when we are asked to make facilitation payments or kickbacks.

FACILITATION PAYMENTS (also known as "grease payments") are typically small, unofficial payments expected by government officials in some countries to secure or speed up an otherwise routine process. For example, paying US$50 to a customs official to release goods from customs is considered a facilitation payment. These types of payments are still bribes in most countries and are not permitted under this policy.

KICKBACKS are generally payments made by one company to an individual within another company in order to obtain and retain business. For example, if a supplier to PPD paid money to a PPD employee as an inducement to be chosen or retained as a supplier to PPD, this would be a kickback. Neither requesting nor receiving kickbacks are permitted.

GIFTS AND ENTERTAINMENT

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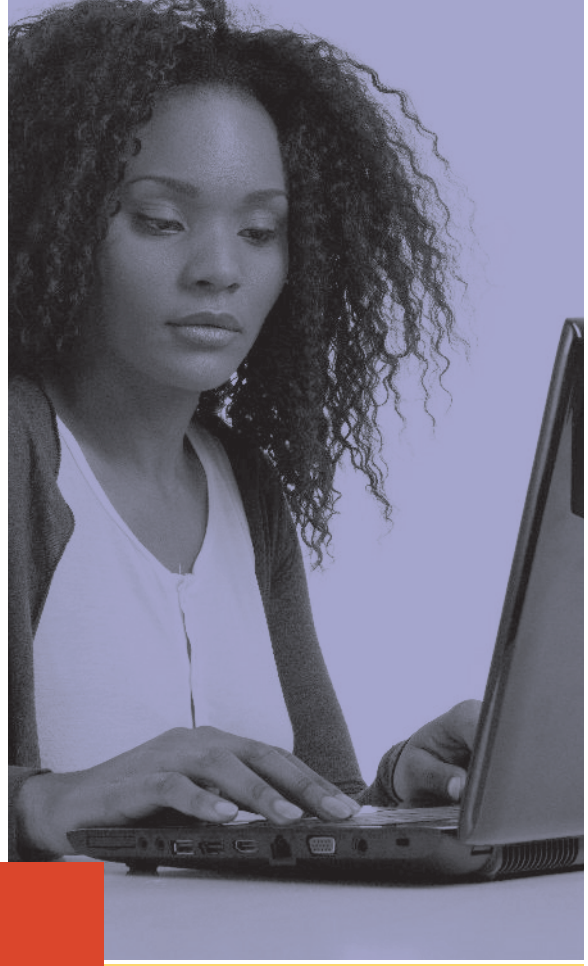


Our Policy does NOT prohibit lawful, modest, customary gift giving or receiving, or appropriate hospitality enjoyed with third parties.

Gifts, entertainment, travel or other reimbursement must not be given or received as a reward or inducement for improper advantage.

Giving and receiving modest non-cash gifts and hospitality are normal business practices and, in certain countries, it is customary to offer gifts prior to meetings or in connection with certain holidays (including the giving of such gifts to government officials). As a company, we respect this. Our Policy does NOT prohibit lawful, modest, customary gift giving or receiving, or appropriate hospitality enjoyed with third parties.

You may not give gifts of cash or cash equivalents, like gift cards or vouchers, other than on very rare occasions when it is customary to do so—for example, funerals in Japan. All such requests for exceptions must be approved in advance via the ***PPD Gifts and Hospitality Register.***

The following sections will help you determine what types of exchanges are appropriate.

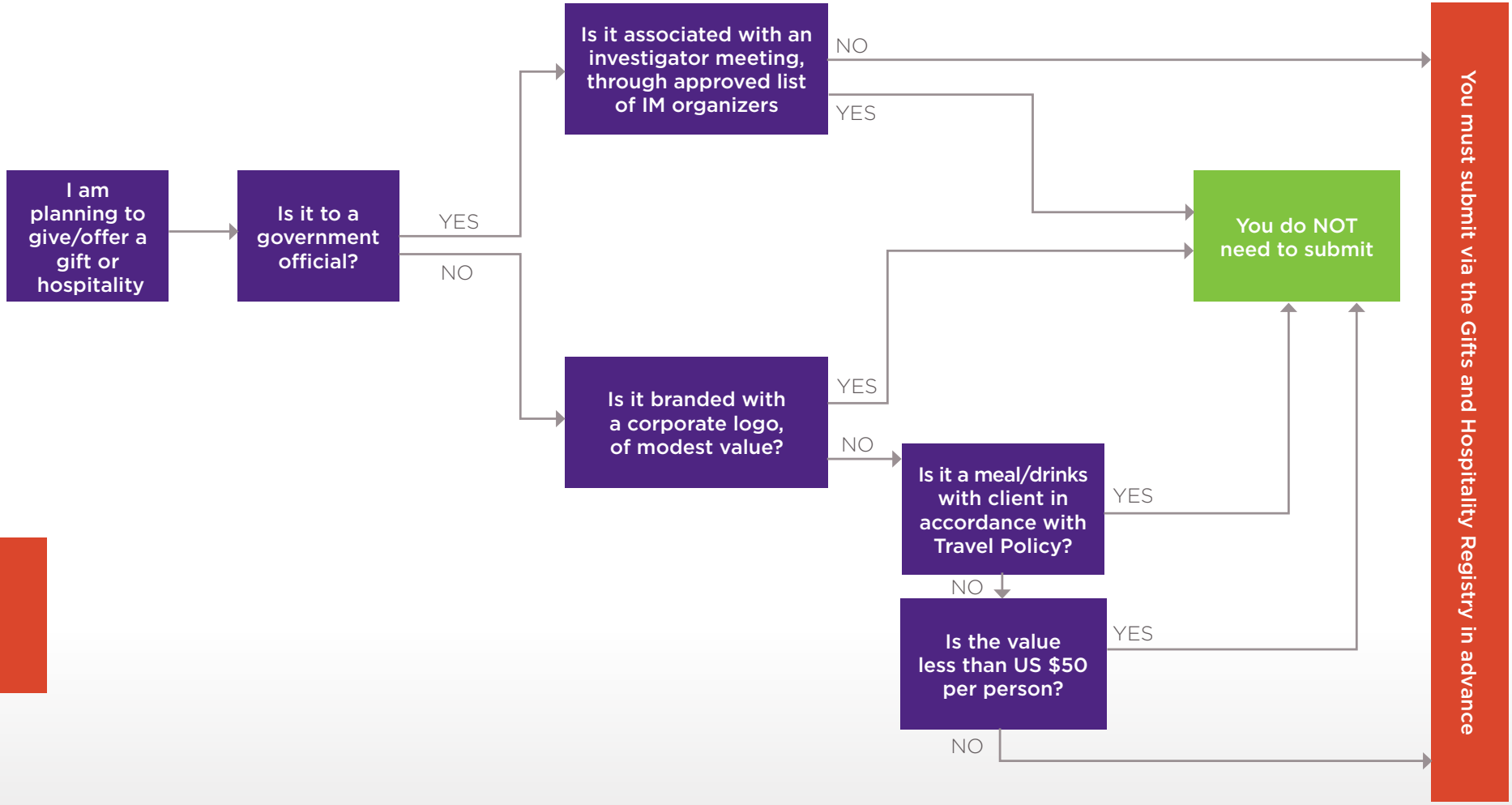
IS THIS GIFT OR HOSPITALITY APPROPRIATE?

When you are considering offering or accepting any gift or hospitality, go through the list below. Proceed only if you can be sure that the gift or hospitality meets all of the following criteria:

+ Modest in value
+ Reasonable and customary in the circumstances
+ Given in a direct and transparent manner, avoiding any appearance of impropriety
+ Not motivated (even in part) by any expectation of improper advantage, including a desire to influence a government official or a commercial contact
+ Tasteful and consistent with generally accepted standards of professional courtesy, including local customs
+ In compliance with local laws and regulations
+ In compliance with our ***global travel and expenses policy***
+ Properly recorded and documented in the company's records and the gifts and hospitality register, if required
+ Not cash or cash equivalent

THE GIFTS & HOSPITALITY REGISTER

Since July 2011, all PPD personnel have been required to log gifts and entertainment in the gifts and hospitality register. The flow chart below will help you decide whether or not you need to make a submission. If you have a question or require more detailed instructions, please see the ***appendix to this Policy***. If this doesn't answer your question, please ***email: PPDCintellateBusinessSystemAdmin@ppdi.com***.



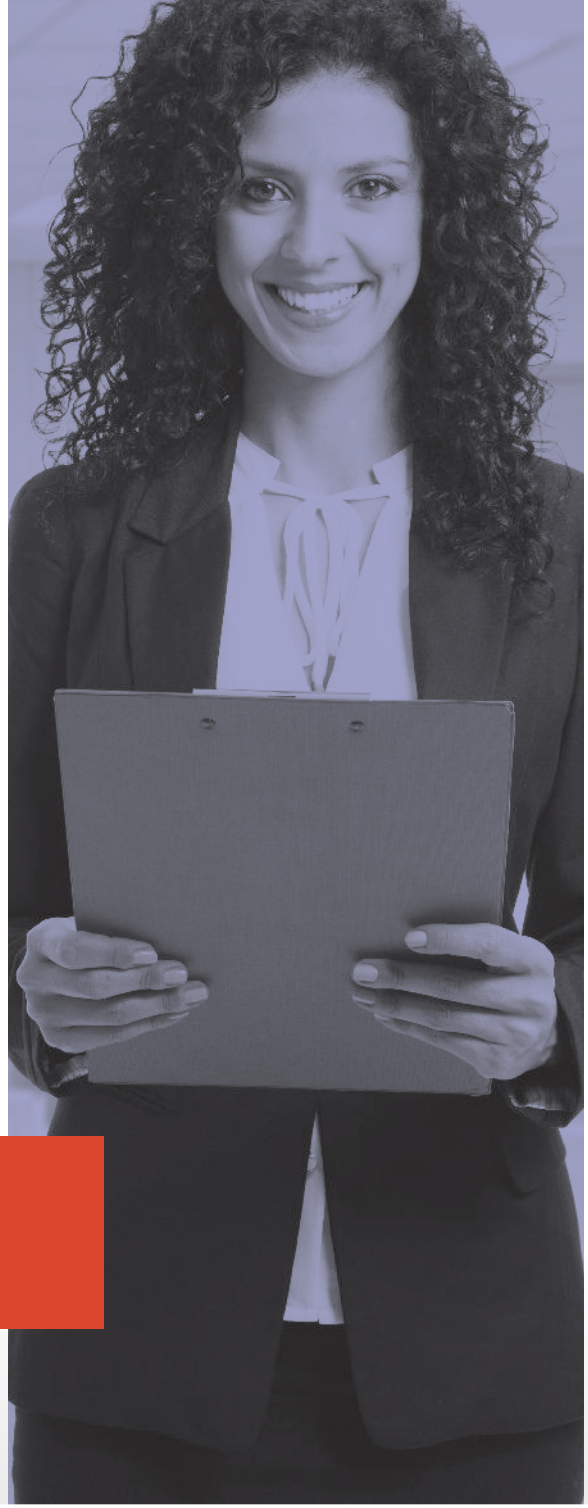
WHY DO WE HAVE A GIFTS AND HOSPITALITY REGISTER?

The gifts and hospitality register is a tool that helps us keep track of the courtesies we exchange with others. Our company understands that it is often difficult to decide whether or not a gift is, or could be perceived as being, inappropriate. The register can help by:

+ allowing us to seek and receive approval for the gifts and entertainment we give and receive
+ protecting us from allegations of bribery and other improper behavior
+ assisting us with our recordkeeping obligations
+ creating a comprehensive global picture of our gift and entertainment practices
+ fostering a culture of openness in regards to gifts and entertainment

HOW DO I DETERMINE VALUE?

If you have received a gift and don't know its value, please just use your best estimate. Use tools available to you, like the internet, to help you figure out what the value is likely to be. If you are making a submission relating to a gift or hospitality to be received by multiple people (such as lunch at a site initiation visit), use the approximate value per person.



LOCAL VALUE LIMITS

Some countries, such as the U.S. and China, have local regulations that limit the value of a gift or hospitality that can be received by a government official. Be aware of the rules in your country, and work within them. If you are advised via the gifts and hospitality register that the value of a proposed gift or hospitality is too high, please identify an alternative of lower value and resubmit.

EXAMPLES OF UNACCEPTABLE AND ACCEPTABLE GIFTS AND ENTERTAINMENT

Travel, accommodation, gifts, meals and entertainment at investigator meetings should be modest, focused on the purpose of the meeting, and in accordance with local regulations relating to benefits to health care providers. **Gifts and entertainment that are unlikely to be acceptable in this context include:**

+ Stays in resort-style hotels
+ Activities such as golf days and sightseeing
+ Travel and accommodation for family members of the designated attendee

CHARITABLE DONATIONS MUST BE MADE IN ACCORDANCE WITH THE

PHILANTHROPIC DONATIONS POLICY

Charitable donations may not be offered or given if the purpose of the donation (in whole or in part) is to improperly influence a government official or commercial contact.

We may not accept any gift or hospitality from an existing or potential business partner, other than promotional items of modest value and business meals consistent with the guidance above.

Gifts that are considered customary in many countries and, therefore, are likely to be acceptable include:

+ Cakes, cookies and candy in connection with certain public holidays
+ Modest breakfast or lunch provided to study-staff at meetings that are likely to last some time, such as site initiation visits

Charitable donations must be made in accordance with the ***Philanthropic Donations Policy***. Charitable donations may not be offered or given if the purpose of the donation (in whole or in part) is to improperly influence a government official or commercial contact.

Please ensure that all gifts and hospitality are pre-approved via the gifts and hospitality register (if meeting submission criteria) and that they are approved in advance by the relevant client. In countries that have reporting requirements such as the "Sunshine Act" in the U.S. and the "Bertrand Act" in France, we also comply with the ***associated internal reporting procedures***.

BOOKS AND RECORDS

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BOOKS AND RECORDS

PPD will maintain books, records and accounts that accurately and fairly reflect all of the company's transactions in reasonable detail.

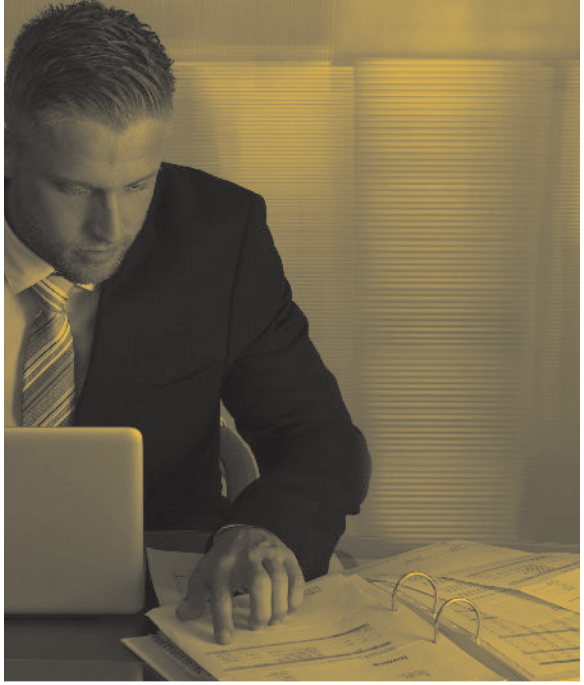
PPD is committed to maintaining a system of internal accounting controls to help us comply with this Policy. These controls help ensure that:

- The transactions we make are authorized by management, both generally and specifically, and our access to assets and funds is limited accordingly.
- Transactions we make are recorded in a way that 1) complies with generally accepted accounting principles and any other criteria that apply to our financial statements, and 2) maintains the accountability of our assets.
- The accounts we record on the balance sheet are reconciled to the underlying accounting detail at reasonable intervals and, where appropriate, compared to the physical assets.
- Appropriate action should be taken with respect to significant differences.

All payments made on behalf of the company must be supported by proper written documentation, including:

- A full and complete description of the services performed, products purchased or liabilities paid
- Approval from an appropriate level of management consistent with the approval limits in place
- The date of the transaction and the amount of payment
- The nature, amount and method of payment required or accepted and identification of the recipient (name, title, affiliation, etc.)
- Any other contemporaneous documentation that will more fully support the payment being made

It is crucial that we maintain accurate and complete records across all of our activities. In particular, keeping records of the gifts and hospitalities



IT IS CRUCIAL

that we maintain accurate and complete records across all of our activities.

In particular, keeping records of the gifts and hospitalities we exchange helps us comply with the anti-corruption and bribery laws that affect us.

we exchange helps us comply with the anti-corruption and bribery laws that affect us. Therefore, this Policy:

+ Prohibits us from establishing or maintaining undisclosed or unrecorded company accounts or other sources of funds
+ Requires us to attach any receipts to expense claims that actually reflect the expense for which we submit them
+ Prohibits us from making false, misleading or artificial entries in any of our books or records—for any reason
+ Prohibits us from using our personal funds to do something that would otherwise be prohibited by this Policy

BUSINESS PARTNERS AND DUE DILIGENCE

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BUSINESS PARTNERS AND DUE DILIGENCE

We are committed to ethical and lawful behavior in our relationships with our business partners. We also expect our business partners to act ethically, lawfully, professionally and fairly, and to comply with this Policy.

All of our business partners are responsible for following the rules and guidelines set forth in this Policy and in the Vendor Code of Conduct, available on the PPD intranet and external website. For business partners we deem as high-risk, we maintain certain additional requirements, which are a precondition to doing business with PPD. These business partners must:

+ comply with specific contractual language—please contact the legal team for guidance
+ agree to comply with this Policy, and ensure that any subcontractors it uses to support PPD will also do so
+ complete a risk management questionnaire—and achieve satisfactory results
+ achieve satisfactory results in respect of external background checks, as deemed appropriate by legal (See due diligence on business partners section for more information)
+ such other requirements as are determined on a case by case basis by the legal team

WHAT IS A "HIGH-RISK" BUSINESS PARTNER?

Any business partner that interacts with government officials or health care providers on behalf of PPD or our clients is considered to be "high risk." They may include subcontractor contract research organizations (CROs), customs brokers and investigator meeting planners, among others.

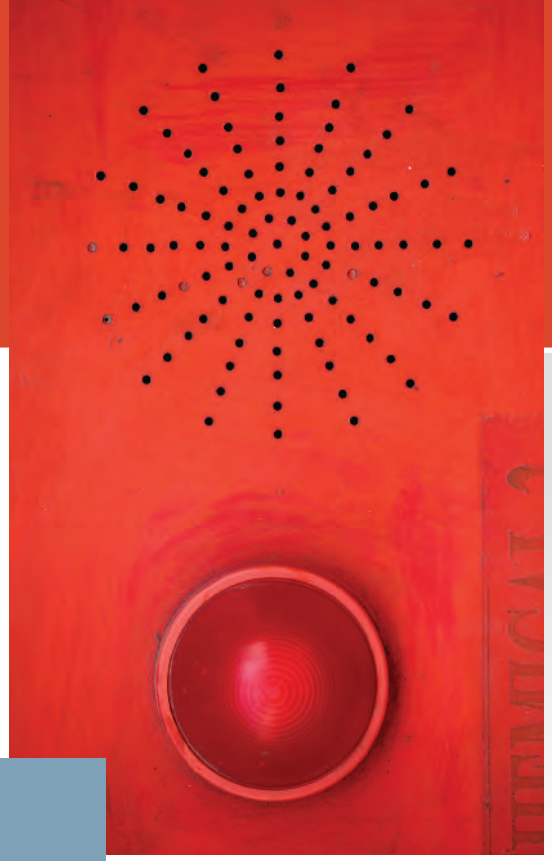
DUE DILIGENCE ON BUSINESS PARTNERS

It is important that we know who we are doing business with, and that they demonstrate a similar awareness of and commitment to ethical behavior. This is because we may be held liable for their behavior. We must be comfortable that each business partner we propose shares our approach to doing business. The best way to achieve that goal is to do due diligence on our business partners to ensure that they are not likely to make or receive a payment (or anything else of value) that would violate this policy.

Relevant PPD personnel are responsible for ensuring that appropriate due diligence is carried out prior to signing an agreement or conducting any business with a proposed business partner. If you are considering proposing a new business partner that will (or could) liaise with government officials or health care providers on behalf of the company or our clients, please contact ***Vendor Management*** for guidance as to the due diligence required.

WHAT IS **DUE DILIGENCE?**

Due diligence is an appropriately thorough level of background research and checks. In this context, it relates to our business partners' approach to and history of lawful and ethical behavior—particularly as regards bribery and corruption.



WHAT IS **A RED FLAG?**

A red flag is something that indicates that there might be a problem. For example, if a representative said to you, "We will need a cash fund from you upfront. This is to make sure we can get the medical supplies through customs. Don't worry, that's how it's done around here," this would be a red flag.

OTHER EXAMPLES OF **RED FLAGS?**

- A history of corruption
- Evasive responses to questions
- Lack of relevant internal policies and procedures
- Reluctance or inability to provide receipts for all pass-through costs
- Lack of detail on invoices or vague terms such as "service fees"
- Request for payment to be made to a third party
- Any activity in a country with a Transparency International Corruption Perceptions Index rating of 25 or less

WHAT DO I DO IF I FIND A "RED FLAG"?

If you or others find a red flag in the course of your due diligence, or if there are unusual or significant risks associated with a particular potential business partner, please prepare a written due diligence report and provide it to the ***legal department***. Please do not proceed until you have received approval from our general counsel or his designee.

CONTRACTING WITH HIGH-RISK BUSINESS PARTNERS

No high-risk business partner may do any work for the company until due diligence is completed and a written agreement is fully signed. In addition to the specific contractual language referred to above, the agreement must:

+ Contain a detailed description of the products and/or services to be provided
+ Contain a payment schedule specifying in detail the price to be paid for each item (which must be commercially reasonable in the circumstances)
+ Specify a payment method that is auditable (e.g., bank transfer)

WHAT SHOULD I DO IF A BUSINESS PARTNER WANTS TO GIVE A GIFT OR HOSPITALITY ON BEHALF OF PPD OR ONE OF OUR CLIENTS?

First of all, you should ensure that they have a copy of this Policy. Work with them to ensure that the gift or hospitality that they are proposing complies with this Policy. If so, consider whether or not it should be submitted via the gifts and hospitality register. If so, you should make the submission, making it clear that you are doing so on behalf of the business partner.

WHAT SHOULD I DO IF I HAVE QUESTIONS?

If you are not sure whether or not a business partner could or will interact with government officials or health care providers on behalf of PPD or our clients, or if you are not sure about due diligence or contractual requirements, please ***contact the legal department***. If you have any more significant concerns, you may use any of the reporting means listed in this Policy.

REPORTING OBLIGATIONS

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REPORTING OBLIGATIONS

Speak out. If you know, suspect or are concerned about anything you think may be bribery or corruption, PLEASE report it.

We believe that it is essential to have an environment in which everyone feels comfortable raising concerns without fear. Our ***policy prohibiting retaliation*** ensures you can make reports of suspected violations without fear of retaliation. It states that you cannot be treated in a negative way—such as being fired or disciplined—if you lawfully and in good faith report a suspected crime or a violation of law or policy. This is true also if you help in the investigation of such a suspected crime or violation.

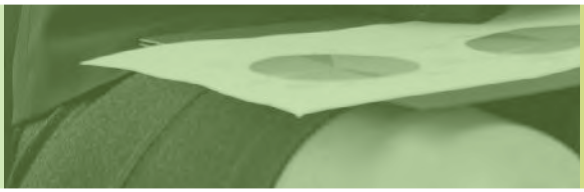
If you suspect there is a violation of this policy, law or ethical principles, you have a responsibility to report that information. You can do so by any of the following means:

- Call or Email: th***e corporate legal contact***
- Call or Email our company's general counsel
- Call or Email our chief accounting officer
- **Call the Code of Conduct hotline:**
  - In the U.S. and Canada, dial +1 888 898 4087
  - For everywhere else, dial +1 770 613 6324
- ***Email: Corporate.Compliance@ppdi.com***

We take reports of possible violations seriously. Concerns and complaints will be investigated appropriately. While investigations are handled with discretion, we may disclose the results of investigations to law enforcement or regulatory agencies, when needed.

KEY TAKEAWAYS:

+ PPD takes a ZERO-TOLERANCE approach to bribery and corruption.
+ We must all take PERSONAL RESPONSIBILITY for ensuring that our behavior is consistent with this Policy, and for reporting actual or suspected violations.
+ A bribe DOES NOT HAVE TO BE IN CASH. Gifts, entertainment and even charitable donations can all constitute bribes in certain circumstances.
+ A bribe is NOT ALWAYS OF A HIGH VALUE. An invitation to lunch could also be viewed as a bribe.
+ Using a third party to offer a bribe on our behalf is still bribery. WE CAN STILL FACE THE SAME CONSEQUENCES, even if we did not offer the bribe directly.
+ Bribery DOES NOT ALWAYS INVOLVE GOVERNMENT OFFICIALS. It can involve suppliers, clients and anyone doing business with us.



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DO THE **RIGHT THING**

APPENDIX:
GIFTS & HOSPITALITY REGISTER

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DO THE **RIGHT THING**

APPENDIX—GIFTS & HOSPITALITY REGISTER

PPD operates a gifts and hospitality register (the "register"), which can be ***accessed through the intranet***.

ALL PPD PERSONNEL MUST USE THE REGISTER, AS FOLLOWS:

1. to seek approval in advance for:
   (i) gifts or hospitality proposed to be given by you (e.g., cakes given to celebrate a local festival);
   (ii) gifts or hospitality offered to you, but not yet received (e.g., invitation from supplier to attend corporate hospitality event); and
2. to register in retrospect any gifts received by you

The following **NEED NOT** be logged in the register:

1. branded gifts of modest value, given or received (e.g., mugs, T-shirts or other promotional items with a corporate logo)
2. gifts or hospitality with a value of less than US $50 per person (other than those to/from government official, which must be recorded in the register regardless of value)
3. meals/drinks with clients (e.g., during client meetings) that are in accordance with ***PPD's travel and expenses policy***
4. gifts or hospitality associated with investigator meetings organized through the approved list of IM organizers
5. gifts or hospitality received by you from PPD
6. gifts or hospitality offered to you, but declined
7. gifts received from clients where the "Employee Rewards from Sponsors" process has been used (EMEA & APAC only); or approved in advance by the corporate compliance committee
8. charitable gifts or hospitality given in accordance with the ***Philanthropic Donations Policy***

NEXT STEPS:

1. The register will automatically direct your request for approval to an appropriate approver
2. You may be asked to provide further information – please respond promptly
3. Approval (or otherwise) will be communicated to you via email

PLEASE NOTE:

1. As regards approvals sought in advance, YOU MUST NOT give or accept the gift or hospitality until you have received approval via the register.
2. Retrospective registration of gifts already received is only for use in circumstances where it was not possible to seek approval in advance, e.g., gift received in the mail unannounced or received at a formal meeting where refusal would have been impolite or offensive to the host. In these circumstances, you may be required to return the gift or take other steps, e.g., donate it to charity.
3. Hospitality events attended by more than one PPD employee need only be registered once. It is the responsibility of the most senior employee to make the registration, although she or he may delegate this task.
4. Use of this register does not eliminate the need for all employees to comply with PPD's Anti-Corruption Compliance Policy and Code of Conduct, its purchasing policy and all other applicable internal policies and procedures as well as local laws.
5. If you become aware of any failure to register any gift or hospitality event in accordance with these instructions, you should immediately inform the company's general counsel and/or the chief accounting officer or their respective designees; or alternatively you may contact the company's confidential Code of Conduct hotline or corporate compliance liaison, as follows:

   FOR CALLS FROM THE U.S. AND CANADA: +1 888 898 4087
   FOR CALLS FROM OUTSIDE THE U.S.: +1 770 613 6324
   BY EMAIL: *corporate.compliance@ppdi.com*

6. If you have any questions about these instructions or about the gifts and hospitality register generally, please *contact corporate legal*, the company's general counsel and/or the chief accounting officer.
7. **Failure to follow this Policy, including the use of the register as set out in this appendix, will be grounds for disciplinary action, which may include termination of employment.**

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For more information, please contact us at
+1 877 643 8773 or +1 919 456 5600

ppdinfo@ppdi.com

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Procedural Document Approval Certificate

This Procedural Document has been reviewed and approved according to PPD processes.

UserName: Hartman, Judd (hartmabj)
Title: EVP GC/CHIEF ADMIN OFF
Date: Monday, 09 December 2019, 06:45 PM Eastern Daylight Time
Meaning: Document received Management Approval
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