



Code of Business Conduct and Ethics



**PRECISION
MEDICINE
GROUP®**



A Message from Our Leaders

Precision Team,

Since the founding of Precision Medicine Group in 2012, we have grown our global footprint, client base, and number of employees who work across our diverse organization. We are committed to excellence, innovation, and integrity, and our success is built on the dedication and hard work of our teams. That is why we establish clear guidelines and expectations for our conduct, both within the organization and in our interactions with external stakeholders.

The purpose of this Code of Business Conduct and Ethics is to provide a framework that guides our decisions and actions. It embodies the Precision Principles and helps ensure that we achieve our business goals while maintaining the highest level of professionalism and ethical behavior.

It is essential that we familiarize ourselves with and adhere to the provisions outlined in the Code of Business Conduct and Ethics. We also encourage open communication and feedback to help us address any concerns or suggestions.

We measure our success not only by what we deliver for clients to support patient access to life-changing therapies, but also how we achieve it.

Thank you for your dedication and commitment to Precision.

Sincerely,

Mark Klein
Co-Founder and
Chief Executive Officer

Ethan Leder
Co-Founder and
Executive Chairman



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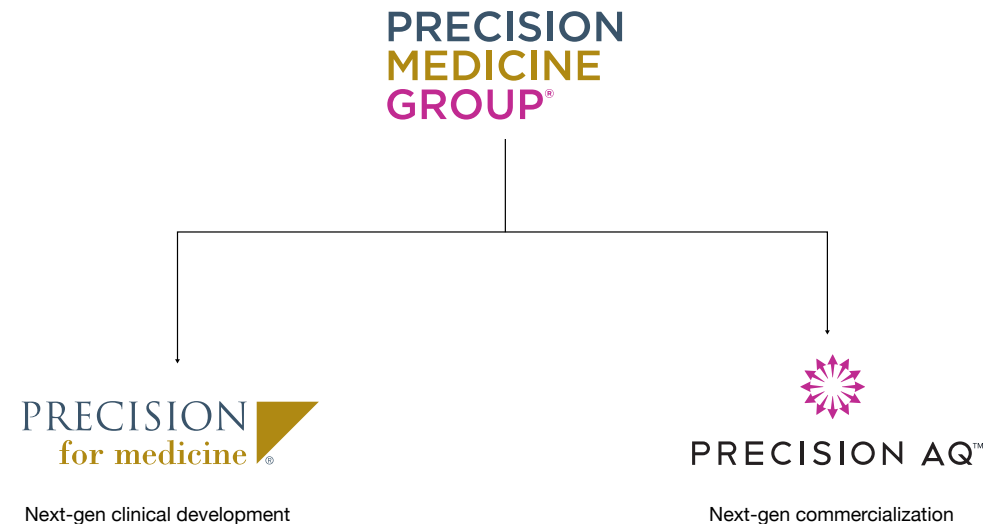
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Ethics and Integrity Guided by Precision Principles

Precision Medicine Group and its subsidiaries (referred to as “Precision,” the “company,” or “we” throughout) have always believed that bringing the right people together could make a positive and important contribution to improving healthcare. To support Precision’s mission—to transform the clinical development process and drive commercial success for our clients by enabling them to bring new drugs to market faster, thereby maximizing benefits to patients and society—we must act with integrity in everything we do.

Integrating science, technology, data, and human expertise, Precision’s ability to deliver targeted solutions that can propel drug development and patient access depends upon each of us living by Precision Principles—Client Service, Purpose, Accountability, Mutual Respect, and Collaboration. These Precision Principles help strengthen and maintain our culture as we grow and evolve as a company.





Ethics and Integrity Guided by Precision Principles



CLIENT SERVICE

Delivering quality, creativity, innovation, and value to every client every day; clients as partners



PURPOSE

Passion and purpose for what we do



ACCOUNTABILITY

Hold oneself and others accountable; own the outcomes



MUTUAL RESPECT

Act with integrity; lead by example; communicate candidly



COLLABORATION

Colleagues as partners

It begins with **CLIENT SERVICE**. We target opportunities to enhance the high-quality products and services we provide to our clients, empowering them to improve the health and wellness of patients and society.

We serve because we have **PURPOSE**. We build on Precision's purpose and passion for developing life-changing treatments for patients to positively impact our people, our communities, and our planet.

And what we do requires **ACCOUNTABILITY**. We hold ourselves accountable by acting ethically, taking active responsibility and ownership for our work and actions, delivering and receiving feedback professionally, and pursuing all relevant facts before making impactful decisions.

All while demonstrating **MUTUAL RESPECT**. We are open and honest in our interactions with our colleagues, clients, investors, and communities, thereby establishing trust and appreciating people with diverse backgrounds and various points of view to foster an authentic and inclusive environment.

COLLABORATION makes it all possible. We combine our collective skills and expertise to advance the goals of our clients, partners, patient advocates, and investors, alongside our own, while improving the lives of others. We can achieve far more together than we could alone.



Ethics and Integrity Guided by Precision Principles

At Precision, our teams work hand in hand with life science companies, extending their capabilities and reach in bringing innovative drugs to market efficiently and effectively. To maintain Precision's position as a leading provider of quality research, development, manufacturing, marketing, and communications, we must hold ourselves to the highest standards of ethical behavior while ensuring compliance with relevant laws and regulations across the company's global operations. Applying Precision Principles in our everyday work facilitates ethical and responsible decision-making.



Purpose

We Are All Responsible

We Make Decisions Ethically

We Speak Up, Keep Open Doors,
and Never Retaliate

Precision was founded on the belief that there was a transformational opportunity to improve the process of bringing new drugs to market. That belief evolved into our purpose as a company — to accelerate the delivery of life-changing treatments and profoundly improve health outcomes.

The Precision Medicine Group Code of Business Conduct and Ethics (the “Code”) helps us stay true to that purpose and work ethically to bring about fundamental changes in healthcare. This Code outlines the standards of ethical and compliant conduct we expect of every employee that underlies our success, and it demonstrates how we can apply Precision Principles to our day-to-day work. It covers risk areas we may encounter and gives us guidance on the proper course of action to take in common situations. In other words, it is a practical guide to navigating how we can and should make decisions with integrity and in full alignment with the letter and spirit of applicable laws, regulations, Precision Principles, and other Precision policies.





We Are All Responsible

This Code applies to everyone working for Precision in any capacity, including, but not limited to, all employees, officers, directors, and independent contractors or consultants of Precision, as well as anyone acting on Precision's behalf, including, but not limited to, subcontractors, agents, vendors, and other third parties.

This Code applies to each of our business dealings and transactions in every country in which we operate, and each of us is responsible for reading, understanding, and complying with this Code.

Precision expects all managers not only to lead individuals to do their best work and contribute to Precision's success, but also to be role models. Managers are expected to:

- Lead by example, demonstrate commitment to our Precision Principles and compliance with this Code, and embody good corporate citizenship.
- Demonstrate commitment to ethics and compliance, communicate this commitment consistently and frequently, and provide clear guidance to direct reports.
- Live and promote an open and transparent culture of ethics where managers and non-managerial employees are encouraged to speak up by asking questions, suggesting ideas and innovations, and reporting concerns.
- Monitor for, identify, and escalate any red flags or high-risk factors that could lead to a violation of this Code.

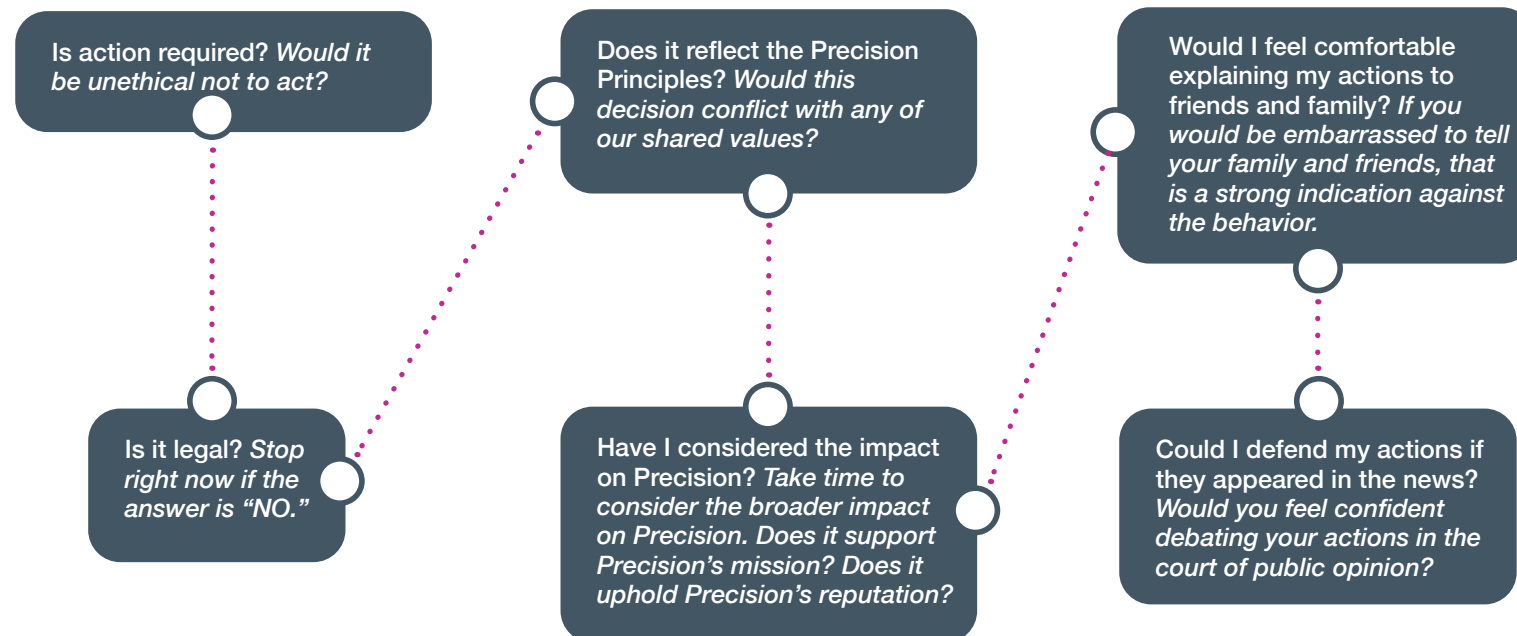
All personnel must never authorize violations of this Code, report violations promptly, cooperate with audits and investigations, complete required training, and seek guidance when needed. Precision's General Counsel & Chief Compliance Officer has overall responsibility for the company's ethics and compliance program, including maintaining policies, providing training, reviewing business practices, and participating in investigations.

Precision shall review, amend, and adjust this Code regularly to make sure it appropriately reflects our organization's commitment to ethics and compliance. Violations of this Code or any other Precision policies may result in disciplinary action up to and including termination of employment.



We Make Decisions Ethically

Neither this Code nor Precision policies will be able to explain how to act in every scenario you may encounter in your work. Therefore, when faced with a situation where the right decision is not clear, ask yourself these questions to support ethical decision making.



If you can confidently reply "yes" to all these questions, you are on a good path to making the right decision. In case of doubt, contact your manager or use any of the available [Speak Up Channels](#).

We Speak Up, Keep Open Doors, and Never Retaliate

At Precision, we are committed to fairness, integrity, and respect for the law in every strand of our business activities. We count on you to challenge yourself and others to evaluate conduct through the lens of our Precision Principles.

If you are aware of any actions that violate this Code, we depend on you to speak up. Precision prohibits retaliation against anyone who makes a good-faith report of known or suspected misconduct.

Whistleblowing or speaking up is when someone makes a report about a perceived wrongdoing in the context of Precision’s business. Examples of wrongdoings include violations of this Code, Precision policy, the law, or any regulatory or quality requirements, as well as anything that could cause reputational harm.



To raise a concern, you can use any of the available Speak Up Channels:

Department	Who to Contact	How to Contact
Management	Line manager, business unit lead, other managers, or company leadership	Usual method of contact (i.e., in person, Teams, phone, or email)
HR	Your HR Business Partner	Usual method of contact (i.e., in person, Teams, phone, or email)
Legal and Compliance	Legal and Compliance representatives	Usual method of contact (i.e., in person, Teams, phone, or email) Dedicated Compliance Email: Compliance@precisionmedicinegrp.com
Speak Up Hotline	24/7 third-party hotline	(800) 461-9330 or one of the local phone numbers you can find at speakup.precisionmedicinegrp.com
Speak Up Portal	24/7 third-party online portal	speakup.precisionmedicinegrp.com

We Respect Anonymity and Confidentiality

Precision hopes that employees feel comfortable voicing their concerns openly. However, anonymous information will be taken seriously and is just as important to Precision as information that is disclosed with a reporter's identity. Because it may be difficult or impossible for a report to be thoroughly investigated if made anonymously, Precision encourages employees to share their identity when reporting.

Concerns raised pursuant to the Speak-Up and Non-Retaliation Policy will be treated by Precision in the strictest confidence as is possible, and we will take all commercially reasonable steps to maintain the reporter's confidentiality and limit disclosure to only those involved in investigating the concern. An exception to this may be if disclosure is required by law, for example.

We Treat All Reports Seriously

Precision treats all reports seriously, and each report will be comprehensively and diligently reviewed. When you raise a concern, you can expect the following:

- The issue will be reviewed by colleagues who are objective.
- If, after this review, the matter is investigated, the investigators will gather information and determine facts. The investigation will be prompt and thorough, and confidentiality will be maintained to the maximum extent possible.
- The investigators may recommend corrective action, if necessary, to appropriate managers for review and implementation.
- Where appropriate, the colleague raising the concern may receive feedback on the outcome.



We Cooperate with Investigations

Precision puts honesty and integrity at the forefront of everything we do. We commit to collaborate honestly and with integrity with investigations, whether internal or external, to support the outcome of the investigation. All employees are expected to cooperate fully in all investigations, even if they are the subject of the investigation.

We Do Not Tolerate Retaliation

At Precision, we encourage openness and confidence in raising concerns in good faith. We are committed to treating all concerns fairly. We do not tolerate retaliation against an individual who speaks up in good faith.

Good faith means coming forward with what you believe to be a violation of this Code, Precision policies, or the law. Even if you only suspect misconduct, you should speak up. It is okay if it turns out you were mistaken, as long as you made the report honestly and in good faith.

Retaliation means taking adverse action against someone as revenge or “payback” for something they have done. Retaliation can take many forms. Examples of direct retaliation include termination of employment, demotion, pay cut, or negative performance evaluation without justification. Examples of indirect retaliation include exclusion from team meetings or Precision-sponsored events.



Learn More

Speak-Up and Non-Retaliation Policy



Mutual Respect

We Treat Everyone with Respect

We Are Diverse and Inclusive

We Do Not Tolerate Harassment
and Discrimination

We Respect Human Rights

We Treat Everyone with Respect

At Precision, our success stems from the ability to work together. Making sure that everyone on a team feels valued while collaborating brings us closer together by confirming that each member is integral to the completion of our work.

Precision's commitment to mutual respect guides each one of our interactions. A respectful work environment enables us to be more comfortable, confident, and capable as individuals and as a company.



Learn More

Global Policy Against Harassment, Discrimination,
and Workplace Violence

How You Can Demonstrate Mutual Respect

- Treat others with dignity and respect.
- Foster positive, collaborative, and respectful relationships across the company.
- Offer praise to colleagues when they do outstanding work.
- Maintain an open dialogue where others can share their ideas and feel heard.
- Assume positive intent.
- Communicate clearly, honestly, and in a timely, professional manner.
- Show consideration for others' time, location (time zones), and work-life balance.
- Speak up when you feel your views, or the views of others, are being disrespected.

We Are Diverse and Inclusive

Creating and maintaining a diverse, equitable, and inclusive workplace is essential for Precision's long-term success because diverse teams bring new perspectives to conversations, develop innovative solutions to problems, and identify risks that others might miss.



To Precision, **diversity** is embracing the uniqueness of each person, **equity** is affording every person the same opportunity to experience success, **inclusion** is the creation of a work environment where differences are embraced, enabling our colleagues to bring their authentic selves to work each day, and **belonging** is the feeling of security and support when there is a sense of being an accepted member of a group.

Precision strives to foster an environment where our employees feel respected, valued, and empowered, and our team members are at the forefront in helping us promote and sustain an inclusive workplace. We remain committed to taking the following actions in support of an inclusive workplace:

- Provide ongoing education and training to all employees on diversity, equity, and inclusion topics.
- Provide all employees with a safe avenue to voice concerns regarding diversity, equity, and inclusion in our workplace.
- Conduct periodic employee surveys and focus groups to identify where our company supports inclusive practices and where there is room for growth.
- Continually evaluate Precision policies and practices for potential bias against or exclusion of one or more groups of employees.

How You Can Foster Diversity, Equity, Inclusion, and Belonging

- Address and report inappropriate behavior and comments that are discriminatory, harassing, abusive, offensive, or unwelcome.
- Promote teamwork and employee participation, and encourage the representation of different employee perspectives by seeking out insights from employees with diverse experiences and backgrounds.
- Avoid slang or idioms that might not translate across cultures.
- Respectfully speak up when seeing decisions or behaviors of others that are based on conscious or unconscious biases, or ask for support in addressing this, if needed.
- Be open-minded and listen when given constructive feedback regarding others' perception of your conduct.
- Attend trainings that are offered by Precision related to diversity, equity, inclusion, and belonging to enhance your knowledge and understanding.



We Do Not Tolerate Harassment and Discrimination

Every employee deserves to be treated with dignity and respect in a workplace free of any form of discrimination and harassment. We take care of our coworkers by acting with kindness and courtesy, and we stand up for each other by speaking up about discriminatory treatment and harassment.

Precision has zero tolerance for discrimination based on a person's race, color, gender, national origin, age, religion, disability, veteran status, sexual preference, marital status, or other protected characteristics.



What Is Harassment?

Harassment is conduct that disrupts another's work performance or creates an offensive, abusive, or hostile work environment. It can be:

- **Verbal:** Written or spoken insults, slurs, threats, or loud or abusive language
- **Physical:** Unwelcome touching or rude and suggestive gestures
- **Sexual:** Unwelcome sexual advances or requests for sexual favors

The perception of harassment and discrimination may vary depending on country, cultural, and personal aspects, as well as personal backgrounds of people involved. As Precision is a global business, employees must be mindful of the cultural context of their interactions.

How You Can Create a Respectful and Equitable Workplace

- Treat others with fairness, respect, and dignity.
- Avoid stereotypes based on race, sex, disability, gender, class, nationality, etc.
- Judge applicants and employees by their skills and achievements.
- Never engage in discrimination or harassment.
- Speak up when a coworker's conduct may make others uncomfortable.
- Report harassment or discrimination using the available [Speak Up Channels](#).



Learn More

Global Policy Against Harassment, Discrimination,
and Workplace Violence



We Respect Human Rights

Human rights are the fundamental and basic rights and freedoms that belong to every person in the world, which include the right to life and liberty, freedom from slavery and torture, freedom of opinion and expression, and the right to work and education.

Precision is committed to upholding and advancing human rights around the globe while remaining in compliance with global human rights and modern slavery regulations. The work we do with our partners has a profound impact on global health, which goes beyond the innovations we develop—our operations also impact the communities in which we live and work.

We take care of our communities by upholding the fundamental human rights of all people. We do not tolerate or condone human rights violations in any part of Precision's global organization. Our responsibility extends beyond the walls of the company to ensure human rights are respected and protected by the companies in our supply chain.

How You Can Support Human Rights

- Recognize that we are all human beings with unique abilities and needs.
- Be aware of your own rights and of your responsibility to respect the rights of others.
- Support those who are vulnerable.
- Be constantly aware of the need to ensure equality of opportunity and fairness in your day-to-day dealings and interactions.
- Refuse to look the other way when you see unfair treatment or abuse. If you become aware of employment practices that breach human rights, speak up.
- Report suspected human trafficking, forced labor, child labor, or other unfair practices using the available [Speak Up Channels](#).



Learn More

Human Rights Policy



Client Service

We Act in the Best Interests of
Our Clients and Our Company

We Compete and Deliver Services
Honestly and Fairly

We Never Let Bribery or Corruption
Impact the Way We Do Business

We Follow Gifts and Entertainment
Policies

We Work with Honesty and Follow
Fair Dealing

We Act in the Best Interests of Our Clients and Our Company

Precision's partnerships thrive because they are built on a foundation of mutual trust. Clients trust us because they know we will act with integrity in the constant pursuit of our shared interests.

We act in the best interests of our clients and company by avoiding even the appearance of a conflict of interest. Together, we help maintain Precision's strong reputation and relationships.

An actual or potential "conflict of interest" occurs when our personal financial interests, loyalties, or relationships improperly interfere with or appear to interfere with the interests of Precision or its clients. A conflict of interest may also appear when business relationships involve family members and others with whom we have a close personal relationship.





How You Can Make Decisions That Benefit Our Clients and Precision

- Never attempt to misuse your position with Precision for undue private gain.
- Stay alert for situations where your personal activities could impact your objectivity and commitment to Precision's best interests.
- Ask your line manager, your HR Business Partner, or the Legal and Compliance Department if you are unsure whether a conflict exists.
- Recuse yourself from the decision on how to resolve a personal conflict of interest and support the outcome.
- Disclose potential conflicts and risks, whether personal or financial, as soon as they arise via Precision's Conflict of Interest portal found on the company's intranet ([precisionCONNECT](#)).
- Be cautious when engaging financially with companies that compete or may do business with Precision. Discuss any doubts with your line manager, your HR Business Partner, or the Legal and Compliance Department.
- Do not take personal opportunities, whether investment or otherwise, that you learn of or about through your work with Precision.
- Do not undertake additional jobs or roles outside of Precision if those may create a conflict of interest with your work at Precision. In practice, this is particularly relevant if such additional job or role may:
 - Interfere with the standards of performance established for your position at Precision
 - Make you unavailable during normal business hours
 - Require you to use any Precision resources or information in the performance of such job or role including, but not limited to, Precision-owned equipment or any materials developed as a result of work for Precision
 - Compete with your responsibilities at Precision or with services and products Precision offers to its clients
 - Engage the same stakeholders, clients, and business partners Precision is engaging as part of its business, particularly if the job/role is in the life sciences/healthcare industry



Learn More

Conflict of Interest Policy

We Compete and Deliver Services Honestly and Fairly

The work we do each day is important and demanding. Clients, patients, business partners, and other stakeholders around the world depend on our research and innovations, creative work, and strategic consultancy.

Precision welcomes competition because it motivates us to work harder and smarter to deliver results and transform lives.

We use competition to our advantage. It fuels our drive to overcome challenges and deliver our best work. Clients come to us because of our strong reputation, work ethic, and valuable skills. We follow antitrust laws to obtain business fairly and ethically.



How You Can Foster a Fair and Competitive Marketplace

- Treat clients with integrity and always deliver fair service.
- Follow all antitrust and applicable competition laws.
- Never engage in unfair practices, such as price fixing, bid rigging, or territory or client allocation agreements.
- Do not use improper means to seek proprietary information about or owned by a competitor.
- Seek advice from the Legal and Compliance Department if you have questions.
- Report violations of antitrust law using the available [Speak Up Channels](#).



Learn More

Antitrust Policy

We Never Let Bribery or Corruption Impact the Way We Do Business

Each day, we take action to deliver on our commitments. We are careful to pursue our goals the *right way* — with integrity.

Precision's commitment to integrity extends to all our business dealings and relationships. By always acting with honesty and fairness, we uphold our Precision Principles and partners' trust. We follow the anti-bribery laws of any country in which we operate. Precision has a zero-tolerance approach to bribery and corruption.

In addition to the innovations we develop, we also contribute time and donate to our communities outside of work. Our charitable actions always come with the best of intentions. We are aware, however, that in certain contexts or in some countries, charitable or political donations by companies can have the same effect as bribes. That's why we are careful to make charitable donations that are legal and ethical under local laws.

How You Can Act with Integrity at All Times

- Never give, offer, promise, or accept anything of value to improperly influence a decision or gain an unfair advantage. "Anything of value" should be interpreted broadly and includes not only cash or lavish gifts but also personal advantages, favors for family or relatives, investment opportunities, or facilitation payments.
- Never use and never request an agent, third party, or vendor to commit acts of bribery or corruption.
- Document decisions and keep complete records of transactions so that no Precision sums can be misused for bribes or corrupt payments.
- Interact with government officials transparently and in line with applicable laws, regulations, and Precision policy.
- Do not retaliate against someone for refusing to engage in bribery or corruption.
- Never use a charitable or political contribution for a corrupt cause.
- Report suspected bribery or corruption using the available [Speak Up Channels](#).



Learn More

Anti-Bribery and Anti-Corruption Policy

We Follow Gifts and Entertainment Policies

Precision serves its clients best by delivering on our commitment to fairness and integrity, and it is not our business practice (and goes against this Code and Precision policies) to offer or accept inappropriate gifts or hospitality and entertainment in exchange for work or favors.

While the opportunity may arise to exchange gifts or hospitality and entertainment with clients and other third parties, if you accept a high-value gift, it could influence or appear to influence your decision-making. Similarly, if you offer a high-value gift or hospitality and entertainment in certain contexts, it could be or appear as bribery. You must take great care to follow this Code and Precision policies when it comes to exchanging gifts or hospitality and entertainment.



Learn More

Anti-Bribery and Anti-Corruption Policy
Conflict of Interest Policy

How You Can Exchange Gifts and Entertainment Responsibly

- Do not offer or accept gifts that are more than nominal in value (i.e., a modest and infrequent nominal gift may be acceptable in certain circumstances).
- Document every gift appropriately in Precision records, according to the relevant accounting and bookkeeping standards.
- Never promise, give, request, or accept a gift that is lavish with the expectation of receiving a business advantage—whether in the form of cash or a cash equivalent.
- Return lavish gifts and decline hospitality and entertainment opportunities that may be offered to you, and report them using the available [Speak Up Channels](#).
- Do not exchange gifts or hospitality and entertainment opportunities with government officials.
- If you are unsure whether a gift is of nominal value, or if a person is a government official or with a government agency, please contact the Legal and Compliance Department.

We Work with Honesty and Follow Fair Dealing

Precision prioritizes honesty and trust in all our business relationships. As such, Precision personnel must ensure accuracy in all communications with both actual and prospective clients and suppliers. We strictly prohibit false, misleading, deceptive, and unsubstantiated claims and comparisons.

How You Can Support Precision's Honesty and Fair Dealing

- Always comply with contract requirements and internal policies and procedures related to Precision products and services, including design, materials, processes, quality, inspection, and testing.
- Conduct and document every inspection and test specified in a contract or required by Precision's internal procedures accurately.
- Make sure any proposed changes to contract requirements are communicated to the client and approved in writing in advance.
- Never substitute products, services, materials, or processes without the client's prior written consent.
- Never misrepresent any product or service offered by Precision.
- Do not provide or invoice for any products or services that do not meet all contract requirements, representations, and certifications without the prior written consent of the client's authorized representative.

Examples of prohibited conduct include:

- Making false, deceptive, exaggerated or unsubstantiated claims about Precision products or services
- Engaging in unfair methods of competition or deceptive acts
- Making false or deceptive statements about Precision's capabilities or resources
- Making false or deceptive comparisons between Precision's and competitors' products or services
- Misrepresenting the quality or effectiveness of products or services

These prohibitions apply to all communications, including advertising, sales materials, promotions, contracts, representations, certifications, and any other communications.



Accountability

We Keep Accurate Business Records

We Conduct Global Business
Respecting Sanctions and Trade
Compliance Frameworks

We Are Accountable for the Information
and Data Our Clients Entrust to Us

We Keep Strong IT and Cybersecurity
Policies to Protect Digital Assets

We Respect Insider Trading Laws
and Regulations

We Protect Personal Data



We Keep Accurate Business Records

Honest and accurate reporting is extremely important. Precision investors and clients count on us to provide truthful information about our work. Most business records may be subject to public disclosure during an investigation. To ensure Precision complies with all laws and regulations, our records must be accurate.

We are each responsible for paying close attention to detail and the accuracy of company records. Making sound decisions based on reliable records allows Precision to deliver quality and value to all of our clients daily.

What Is a Business Record?

A **business record** is any type of document Precision develops or creates and can include, without limitation, timesheets; travel and expense records; invoices, reconciliations, and financial statements; and reports to executive management, clients, auditors, and regulatory officials.



Learn More

Applicable finance, expense, accounting, or records retention policies

How You Can Maintain Clear and Exact Accounts

- Complete all documents accurately, truthfully, and on time.
- Follow internal controls regarding financial records.
- Declare and keep a written record of any expense or gift you give or receive.
- Submit expense claims relating to gifts or payments to third parties and include the reason for the expense.
- Do not make false or misleading entries or statements in any records or documents.
- Avoid exaggeration, colorful or derogatory language, guesswork, and legal conclusions.
- Follow document retention policies when destroying documents.

We Conduct Global Business Respecting Sanctions and Trade Compliance Frameworks

Precision strives to adhere to the highest business and ethical standards. Our commitment to ethical conduct means that we abide by the letter and the spirit of applicable laws and regulations.

Trade laws and regulations govern the way we can conduct business worldwide. Countries impose international sanctions to restrict certain nations or companies, which can include trade embargoes, boycotts, travel bans, and frozen assets. Success in any global business depends on our compliance with these laws and sanctions.



Learn More

Trade Compliance Policy

How You Can Conduct International Trade Responsibly

- Know and follow the trade laws of every country in which Precision does business.
- Follow Precision policies and procedures regarding trade regulations.
- Never market, sell, or provide services in breach of trade restrictions or sanctions.
- Be cautious about and alert the Legal and Compliance Department if you are asked to engage in business with any business partners in high-risk jurisdictions.

We Are Accountable for the Information and Data Our Clients Entrust to Us

Information and data are the foundation of everything we do. Without it, Precision would not be able to research, advise, consult, plan, or perform services for its clients.

The steps we take to protect our information and our clients' information are critical to our success. In the course of your work, you may have access to confidential information about Precision or other companies. You must only use this information for work purposes and should only disclose it to those who, like yourself, need to access and know such information to perform their work. Precision and its clients rely on each of you to be accountable by keeping confidential information secure—whether onsite at a Precision facility, at an offsite work location, or working remotely from home.

Any unauthorized disclosure or access to confidential information, even if accidental and unintentional, may impact Precision and our clients. Precision may be under both legal and contractual obligations regarding responding to confidentiality breaches. You must promptly inform your manager and the Legal and Compliance Department of any unauthorized disclosure, even if inadvertent, so that Precision can fulfill its duties under law and contract.

Examples of confidential information include, but are not limited to:

- Information that is intended for internal use only (e.g., client lists, employee lists, Precision processes)
- Business intelligence connected to R&D programs, product launch campaigns, marketing strategies, or sales insights
- Client documents such as project briefs, R&D program descriptions, trial protocols, safety reports
- Proposals, bids, and pricing details
- Strategic business development or commercialization plans
- Financial records and personnel records

How You Can Keep Information Secure

- Protect the confidential information entrusted to you.
- Limit access and disclose information only to those who have a need-to-know to do their job.
- Make sure any data, information, attachments, or documents are sent only to the intended and relevant email addresses.
- Stay vigilant about the security of confidential information when working from home or remotely.
- Do not discuss confidential information in public areas (e.g., planes or elevators).
- Refrain from printing documents containing confidential information, but if you need to print, shred the documents instead of discarding them in a general trash or recycle bin.
- Never enter confidential information into systems not approved by Precision.
- Never use confidential information for personal gain.
- Return confidential information in your possession when your employment ends.
- Report unauthorized disclosure to the Legal and Compliance Department.



Learn More

Confidential Information Policy
Information Security Policy

We Keep Strong IT and Cybersecurity Policies to Protect Digital Assets

In a digital economy, data-driven companies like Precision maintain most of their know-how, assets, and information in electronic formats. This refers to both Precision information as well as information our clients provide to us.

All Precision employees must maintain high IT and cybersecurity awareness as well as comply with related Precision policies. External threats including malware, spyware, and commercial information theft can have a dramatic impact on Precision and our clients.

You must treat Precision's IT infrastructure with a high degree of care and comply with Precision's IT and cybersecurity policies.





How You Can Uphold IT and Cybersecurity Standards and Protect Digital Assets

- Never modify, disable, tamper with, work around, or override Precision's IT security systems, including the technical and organizational security measures that are established in your workplace or installed on your devices.
- Get pre-approval to work from remote locations especially in countries outside of where you live.
- Change passwords and account settings as required by Precision policies, and never share passwords for your own devices, accounts, or network with anyone else.
- Be hyperalert to cyberattacks, ransomware, and phishing emails, and notify the Precision Security Operations team immediately upon noticing any suspicious activity relating to digital or physical IT security of Precision assets.
- Double-check email recipient lists when sharing confidential information externally so that information relevant to one client is not disclosed to other clients or other third parties.
- Whether working from home or in a public place, use a secure connection rather than a public Wi-Fi connection, and use privacy screens to protect Precision information, as needed.



Learn More

[Electronic Communications and Equipment Policy](#)
[Information Security Policy](#)
[Electronic Signatures Policy](#)
[Incident Response Plan](#)
[Data Integrity Policy](#)
[Logical Security Policy](#)
[Physical Security Policy](#)
[Removable Media Policy](#)

We Respect Insider Trading Laws and Regulations

In the course of our jobs, we may have access to material, non-public information that a reasonable investor would want to know before making an investment decision or that could have a substantial effect on the market price of securities, whether over the short term or the long term. This is known as inside information.

We demonstrate strong ethical behavior and integrity by keeping inside information safe. We never use it for personal gain.

Trading or sharing inside information is unethical and illegal. The penalties for insider trading can be severe, including dismissal, fines, and jail terms. We protect our company, clients, coworkers, and reputation when we safeguard inside information.

What Is Non-Public Information?

Non-public information has not yet been announced to the public. Examples include:

- Information available to a group of analysts, brokers, or investors
- Undisclosed facts that are the subject of rumors
- Confidential information

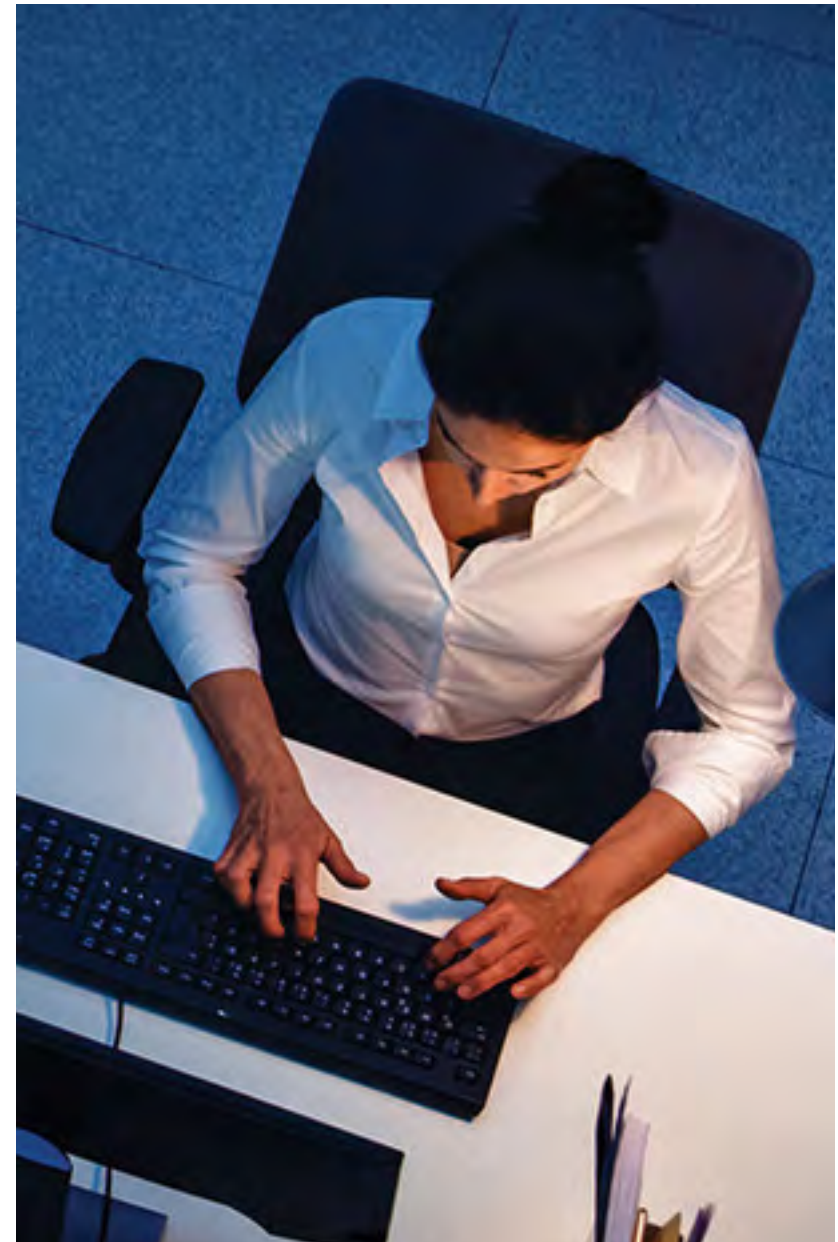
What Is Material Information?

Material information is data an investor would want to know when making an investment decision. It could affect the market price of securities. Examples include:

- The status of large commercial contracts
- Joint ventures, partnerships, or mergers
- Product road maps, calendars, projections, and forecasts
- Results of clinical trials and other research endeavors
- Major changes in pricing or accounting methods
- Changes in management or the board of directors
- Developments about litigation or investigations
- Cybersecurity risks and incidents
- Offerings of company securities

How to Ensure You Do Not Misuse Insider Information

- Identify any “inside information” you come across at your work.
- In case of doubt, ask your manager or the Legal and Compliance Department.
- Never share inside information with friends, family, or external people.
- Do not share any inside information with unauthorized recipients based on “you can tell me, I won’t tell” assurance.
- Do not trade and/or instruct friends or family to trade on inside information.



Learn More

Insider Trading Policy

We Protect Personal Data

As part of the work we do at Precision, we must collect and process personal data. It may belong to employees, clinical trial subjects, business partners, and contractors. We prove our coworkers and clients can rely on us by following our data privacy policies and laws.

Privacy, security, and data protection are increasingly important to maintaining the trust of our employees, clients, and partners worldwide. We are committed to respecting personal data protection and privacy and have developed data protection and privacy policies and procedures that govern the processing of personal data by Precision.



What Is Personal Data?

Personal data, also known as **private data** or **personal information**, is understood as information about an identified or identifiable individual. Such data may identify an individual directly or indirectly, especially when used in combination with other information. Examples include, but are not limited to:

- Name and last name
- Home address
- Phone numbers and personal email address
- Information about an individual's health, race, or religious beliefs

Personal data can be in any media or format, including computerized or electronic records and paper-based files.

Please remember that even some coded data may still be considered personal data if it is possible to decode it and identify individuals. In case of doubt, consult the Legal and Compliance Department to determine if the data you are handling might be considered personal data.



How You Can Take Care of the Personal Data Entrusted to Precision

- Respect and protect others' personal data.
- Be transparent about what you collect, how you use it, and why.
- Request and retain only as much personal data as necessary and share personal data only with those who have a need-to-know to do their job.
- Follow applicable privacy laws, Precision privacy policies, information protection controls, and security procedures that apply when collecting, storing, sharing, using, or destroying personal data, and when transferring personal data internationally.
- Report any improper use of personal data to Precision's Data Protection and Privacy Department.



Learn More

Data Protection and Privacy Policy



Collaboration

We Follow the Law When Working
with the Government

We Work with Third Parties Who Share
Our Principles

We Communicate Truthfully with
Balance and Care

We Keep Our Workplaces Healthy
and Safe

We Follow the Law When Working with the Government

In our work, we lead by example and demonstrate how to conduct business ethically. We work well with a variety of clients because of this strong commitment to integrity. It is an honor to do business with local, state, and national governments.

Doing business with the government is highly regulated. The penalties for failing to follow government procurement laws are severe and include substantial civil and criminal fines, imprisonment for responsible individuals, and debarment of Precision from doing business with the government.

Precision is committed to meeting all regulations and requirements related to procurement and performance of its government contracts. We take active responsibility and ownership for our work with governments by embracing these requirements.

How You Can Ensure We Meet Our Responsibilities for Government Clients

- Communicate honestly and transparently with each client.
- Understand the ethics and compliance requirements that apply to each client.
- Follow relevant government procurement laws, regulations, and policies, including the Public Health Service (PHS) Policies on Research Misconduct.
- Know the applicable requirements when connected to governments indirectly. These may apply when our partners work with government entities because the government will later pay for our services.
- Never offer anything of value to government officials.
- Avoid financial conflicts of interest. This applies particularly to investigators.
- Ask a manager or the Legal and Compliance Department if you are unsure about the requirements applicable to your job.



Learn More

U.S. Government Contracts Policy

We Work with Third Parties Who Share Our Principles

Precision Principles shape who we are and how we act. They define us as individuals and as a company. We ensure that all employees and partners who represent us share our Precision Principles.

We work with third parties in many aspects of our business, and we are committed to ethical and lawful behavior in our relationships with such business partners. That is why we expect each third party to prioritize client service, purpose, accountability, mutual respect, and collaboration. Precision also requires third parties to act ethically and sustainably, follow laws and regulations, be fair and professional, and comply with this Code and the guidelines set forth in it.



What Is a Third Party?

A **third party** is any individual or organization we encounter during our work. Examples include:

- Actual and potential clients
- Suppliers, distributors, and dealers
- Business contacts
- Agents and subcontractors
- Advisers and consultants
- Lobbyists
- Government and public bodies, including their:
 - Advisers
 - Representatives, officials, and politicians
 - Political parties

How You Can Ensure Third Parties Uphold Our Principles

- Conduct due diligence on potential third parties prior to engaging them as business partners and consult with the Legal and Compliance Department if you have any concerns about such third parties.
- Watch out for potentially corrupt behavior or red flags.
- Ensure all contracts with vendors, business partners, and agents are in writing and require them to follow this Code, particularly in the areas of compliance with anti-bribery and anti-corruption laws.
- Never enter into a transaction that evades currency, tax, or other laws of a foreign country.
- Report suspected corrupt behavior using the available [Speak Up Channels](#).





We Communicate Truthfully with Balance and Care

At Precision, we take pride in translating the science of medicine. We execute complex studies and maximize insight into patient biology by integrating deep science, advanced technology, clinical trial expertise, and manufacturing services, to advance clinical development around the globe.

We transform and leverage evidence and insights to tailor communications for every stakeholder—from payers to health systems, scientists to healthcare providers, and consumers to advocates. The importance of and our commitment to clarity and consistency not only applies to Precision’s client-related work, but also extends to each of our individual communications.

We speak to the public about our work in many ways—online, in person, and through the press. All press inquiries about Precision and media engagement should be managed by Precision’s Communications team. You may speak on Precision’s behalf only if authorized according to the company process.

Social media, both inside and outside Precision, has transformed the way we interact. Online collaboration enables us to share knowledge and ideas regardless of rank, title, or experience. It is a way for us to take part in conversations around the work we do at Precision and show our expertise in these areas. While this digital interaction brings huge benefits, it also comes with certain risks and responsibilities. You must ensure your social media interactions are safe, positive, and truly representative of our Precision Principles.

How You Can Use Social Media Positively

- Get engaged and act as a role model. We encourage you to make the most of the opportunities offered by social media to demonstrate leadership, champion our capabilities, humanize our business, and celebrate success.
- Safeguard your account and our network. Apply the same rules of personal behavior online as you do offline. All employees must comply with the law, behave ethically, and prioritize information security. You must never forget that your online behavior reflects both you and Precision; your social posts are permanent.
- Think before you post. While we encourage you to celebrate our successes and champion our capabilities, you must not give away commercially sensitive information: always protect Precision’s and its clients’ and suppliers’ confidential and other proprietary information.



Learn More

Electronic Communications and Equipment Policy
Social Media Policy
External Communication Policy

We Keep Our Workplaces Healthy and Safe

Health, safety, security, and environmental protection are paramount to how we do business. At Precision, we are each responsible for looking after not only our own wellbeing, but also that of our coworkers, clients, suppliers, visitors, and the public.



When we protect the health and safety of our coworkers, community, and environment, we demonstrate respect and contribute to a positive work environment. Keeping each other safe means keeping danger *out* of the workplace. That includes even the potential for danger. We prevent harm by maintaining a violence-free, weapon-free, and drug-free workplace.

Precision strives for continuous improvement wherever possible and economically viable, and we proactively seek to employ new, more sustainable technologies and processes to minimize our impact on people and the environment.

How You Can Help Maintain a Healthy and Safe Environment

- Identify areas for improvements and continuously work towards improved safety and a better environment.
- Integrate considerations regarding safety, security, health, and environment into your daily work.
- Stop your work when it is not safe and immediately report the issue using the available [Speak Up Channels](#).



Learn More

Global Policy Against Harassment, Discrimination, and Workplace Violence



PrecisionMedicineGRP.com

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