

The background of the slide is composed of several microscopic images. In the top-left and bottom-left corners, there are images of blue, fibrous structures that look like plant roots or biological filaments. In the center-right, there is a rectangular inset showing a cross-section of plant tissue with distinct, rounded cells. The overall color palette is dominated by various shades of blue and cyan.

Doing the *Right* Thing

Your Resource Guide to
Responsible Business Practices

clinical | commercial | consulting | capital

Doing the Right Thing is a guide to the responsibilities we share for ethical business conduct. It will help you know and apply our requirements for personal and corporate behavior. While we cannot give clear-cut guidelines for all situations, we can point out potential issues and give general guidance to help you in your decisions. In the end, we rely on your personal judgment and integrity to uphold these standards.

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Doing the *Right* Thing

Letter from Dennis Gillings



Dear Colleagues,

As you know, Quintiles makes important contributions every day to improving healthcare worldwide. The work that we do, and the way that we do it matters. Our reputation for integrity and excellence is an integral part of our continued success as we help customers navigate *the New Health*.

“*Doing the Right Thing*” is Quintiles’ code of conduct and a key part of our dedication to stewardship as we work with an unwavering commitment to patients, safety and ethics.

Please read and use this document to help you better understand the standards for ethical business behavior we’ve set for ourselves and the laws that govern our work. It has been updated to reflect our new brand. We hope you will find this version of the code to be a practical, user-friendly resource. The look and feel of this document may be new but the standards and values it summarizes are not.

Customer service, teamwork, integrity, quality and leadership are recognized as the enduring values to which we aspire at Quintiles. More than words, these values actually drive the expectations for our behavior as Quintiles employees.

Thank you for your continued commitment to creating and maintaining an ethical work environment at Quintiles.

Best Regards,

A handwritten signature in black ink, appearing to read 'Dennis Gillings', written in a cursive style.

Dennis Gillings, CBE
Chairman and CEO, Quintiles



Quintiles Values and Purpose statements reflect our core beliefs about who we are as a company and what we do. Since we operate in a global, changing market, our Values and Purpose statements give us constant guiding principles.

Quintiles is dedicated to:

Teamwork

- > *Creating dynamic, talented teams that: work locally and globally; communicate openly internally and externally; and are passionate about and enjoy what they do*

Leadership

- > *Leading by example; welcoming change; encouraging innovation; providing an environment of professional learning and development; and creating value for stakeholders through sustained and profitable growth*

Customer Service

- > *Building lasting customer relationships by focusing on customers' needs and striving to exceed their expectations through flexible, customer-driven solutions*

Integrity

- > *Acting with an unwavering commitment to business and scientific integrity; building trust through honest, ethical behavior; acting with respect for others; behaving as responsible members of local communities*

Quality

- > *Developing a reputation for quality; delivering services and information that meet or exceed the quality standards demanded by customers, doctors, patients and regulatory authorities*

Our Purpose

Quintiles helps to improve healthcare worldwide by providing a broad range of professional services, information and partnering solutions to the pharmaceutical, biotechnology and healthcare industries.

Quintiles has strong organizational functions that support ethical behavior, corporate compliance and achieving results with integrity.

Reporting to the Quintiles executive officer responsible for compliance oversight are the following functions:

- > *Chief Compliance Officer*
- > *Chief Medical Officer*
- > *Global Quality Assurance*
- > *Business Ethics Office*

Other functions supporting our commitment to ethics and compliance include Global Human Resources, Legal, Internal Audit, and Environmental, Health & Safety.

The Compliance Management Committee (CMC) oversees the Company's compliance practices. The CMC is chaired by the Chief Compliance Officer and provides reports to the executive officer responsible for compliance oversight. The CMC also provides periodic reports to Corporate Governance, Quality and Regulatory Committee of Quintiles' Board of Directors.

Additional Guidance:

Ethics and Compliance QZone
site: [Ethics and Compliance](#)

Office of the Chief Medical and Scientific Officer QZone site: [CMO](#)

Global Quality Assurance QZone
site: [Global QA](#)

Integrity is a core Quintiles value. We are all responsible for ethical business conduct.

Your responsibilities include:

- > *reading this guide and following the standards it sets forth*
- > *conducting yourself with integrity and in a professional manner*
- > *complying with the Quintiles policies and procedures that apply to your respective duties*
- > *not engaging in any unlawful or unethical activities*
- > *seeking guidance when needed from the resources listed in this guide*

If you know of or suspect a violation of our standards, you owe it to yourself, your colleagues and Quintiles to report your concerns. Make such reports to your manager or any of the resources listed in this guide.

The responsible business practices in this guide apply in all countries where we do business. They also apply to all Quintiles employees (including temporary and contract employees), agents, officers and directors.

Manager's Additional Responsibilities

Quintiles expects its leaders to set the tone for ethical conduct by:

- > *modeling our values*
- > *communicating the importance of "Doing the Right Thing"*
- > *creating an environment where people feel at ease to ask for help or raise concerns*
- > *reporting possible misconduct promptly*
- > *not taking or allowing retaliatory actions on people who report concerns*

Non-Retaliation

Quintiles strictly prohibits retaliation against employees who seek guidance or raise a good-faith concern. Quintiles also prohibits retaliation against employees who participate in investigations of alleged misconduct. Anyone engaging in such retaliation will be subject to discipline. If someone retaliates against you, contact your manager, your local Human Resources Representative or the Business Ethics Office.

Q&A

I know about a violation of our finance policies but am afraid to report it. If I make a report, how does Quintiles protect me from retaliation?

We take measures with each report to help protect the person making it. Such measures can vary but may include:

- > *reminders to those involved of the non-retaliation policy*
- > *ongoing monitoring of the issue*
- > *corrective action for retaliation (if any occurs)*

You should always report retaliation so that corrective action can take place.



Healthcare Laws and Regulations

Our mission to improve healthcare worldwide calls for ethical conduct in clinical research studies. It requires ethical conduct in our relations with healthcare providers as well.

Human Subject Protection and Research Ethics

Clinical trials help decide the safety and efficacy of our customers' products and they need volunteers. This is why we protect the rights and safety of human participants in all areas of clinical research. Quintiles operates to accepted ethical principles for clinical research such as those set forth in the Declaration of Helsinki.

We follow worldwide standards of quality and ethics, including "Good Practice" standards. They include good laboratory, good clinical and good promotional practice. Our policies and procedures help us to meet ethical principles, Good Practice standards and legal requirements. You must follow our policies and procedures that apply to your area of responsibility.

The Council on Research Ethics (CORE) and the Office of the Chief Medical & Scientific Officer monitor the use of standard practices and procedures. They do so to ensure ethics in research.

Interaction with Healthcare / Promotional Activities

Many of our services require contact with healthcare professionals. Laws and regulations often apply to such relations. If your work involves interaction with healthcare professionals, you must make sure such interactions:

- > *are permitted by law and our policies*
- > *serve a business purpose such as creating good work relationships, education or research*
- > *do not interfere or appear to interfere with a healthcare professional's independent medical judgment*

Take extra care when dealing with healthcare professionals who are government employees. They include those working for a publicly owned institution. Added laws, policies or procedures may apply to such situations.

Governments regulate the promotion of our customer's products. Our policies and procedures let us meet these legal requirements. If your

work includes these customer products, you must follow our policies and procedures on:

- > *payments to healthcare professionals*
- > *reimbursement claims*
- > *medical education*
- > *handling / distribution of drug samples, and*
- > *promotion of pharmaceutical products*

Report any concerns you have regarding promotional practices to Commercial Quality Assurance, Legal or the Business Ethics Office.

Reliable Data

Our work impacts our customers' delivery of safe and effective life-sustaining products. Customers and government agencies trust our data to make decisions on the safety and efficacy of healthcare products. Reliable data helps ensure the safety of our customers' products and the patients who use them.

We are required to give accurate data no matter what format it is in, hardcopy or electronic. Regulatory agencies have controls and safeguards for research data. They also regulate the computerized systems that hold such data. These regulations help ensure the data we submit is reliable. Quintiles has policies and procedures, and a Systems Compliance Office to help us meet these regulatory requirements.

If you create, handle or monitor research or healthcare data, you must meet our related policies and procedures. You must also guard the integrity and security of our computer systems by:

- > *not sharing your password*
- > *not logging on for another person*
- > *not giving other people unauthorized system access*

Q&A

A client plans to do a clinical trial in a country, but has no plans to seek approval to sell the product in the country. Is this plan acceptable?

International standards on clinical trials discourage doing clinical trials in markets where the product will not be offered. You should report this to the Council on Research Ethics, the Chief Medical Officer or the Business Ethics Office. You may also want to remind the customer that it is in their best interest to follow these requirements.

My manager said I could raise my sales if I told a doctor about a newly discovered use for one of our client's products. This use is not approved yet. May I do this?

No. Such action may constitute "off label" promotion. Our policies ban such activities. Contact the Legal Department or the Business Ethics Office for extra guidance.



Additional Guidance

Corporate Policy No. 003
[Ethics, Compliance and Quality](#)

Corporate Policy No. 013
[Computer System Compliance and Validation](#)

Council on Research Ethics QZone
site has links to various standards
noted in this section

CORE
Email: core.info@quintiles.com

Office of the Chief Medical and
Scientific Officer QZone site: [CMO](#)

Quintiles' public website on clinical
research: clinicalresearch.com

Systems Compliance Office QZone
site: [SCO](#)

Systems Compliance Office email:
Systems_Compliance_Office@quintiles.com

Personal Information Protection

We collect personal information as part of our research and business work. This can include a person's employment, finances, education or health.

We may hold personally identifiable health information on a study subject's medical condition and history and/or treatment. We also keep information on employees as it relates to their jobs. We must protect such information and keep it safe.

If you access personal information on any person (including study subjects), you must:

- > *adhere to our policies and procedures created to protect such information*
- > *handle such data according to all related laws and regulations*
- > *meet any extra standards required by contract, Delegation Agreement or Data Transfer Agreement*
- > *not disclose personal data to a third party without appropriate authorization*

Our global Chief Privacy Officer and the Council on Data Protection (CODP) manage our data security and privacy policies.

Q&A

I am a manager and a former employee has asked me for a reference. I have only good things to say about this person. May I give the reference?

No. Our policy is that only Human Resources may respond to requests for references. You should forward the request to your local HR representative.



Additional Guidance

Corporate Policy No. 011
[Protection of Individually Identifiable Information](#)

Our public privacy statement: [Privacy Statement](#) explains how we guard personal data sent from Europe to the US. It also has info on our "US-EU Safe Harbor" certification.

The Council on Data Protection
QZone Site: [CODP](#)

CODP email: council.data.protection@quintiles.com

Report any disclosure or loss of personal or confidential customer information to the Privacy Incident Response Team (PIRT):
data.protection@quintiles.com
1-877-998-2100

We collect personal information as part of our research and business work.
This can include a person's employment, finances, education or health.
We must protect such information and keep it safe.

Improper Payments

Bribery and Corruption

The effects of bribery and corruption are widespread. They are harmful to both businesses and individuals. Most countries where we work have laws against bribery. They apply to the bribery of government officials and private persons.

Quintiles has a “No Tolerance” policy for any type of bribery or corruption, no matter where it occurs. In particular, you must not offer or give, directly or indirectly, anything of value to a government official to:

- > *sway official action*
- > *win business, or*
- > *get an improper advantage*

This policy extends to all of Quintiles’ global business dealings and transactions. It also covers locations where anyone working on our behalf operates.

You may not make payments to agents or other representatives of Quintiles if you think it may be used to bribe anyone, including government officials.

Government officials may include healthcare professionals and scientists that work at public institutions, such as a government-run hospital.

We also need accurate financial record keeping to comply with anti-bribery laws. Everyone at Quintiles must keep records that accurately detail all transactions and payments.

The Anti-Kickback Law

The Anti-kickback Law bans offering a person anything of value for the purpose of inducing them to buy or prescribe a healthcare product or service that the government might pay for (such as by Medicare or Medicaid). These laws seek to restrict the corrupting influence of money or gifts on a healthcare provider’s decisions.

Contact the Legal Department, the Anti-kickback Compliance Officer or the Business Ethics Office if you think you have been asked to pay a bribe or kickback. You can also contact them if you learn of such conduct by anyone working for Quintiles.

Potential “government officials”
you may deal with:

- > *Doctors and healthcare providers working for government hospitals or universities*
- > *Public health officials*
 - *Customs and importation officials*
 - *Healthcare regulators, such as inspectors*
 - *Officials responsible for product approval and registration*
 - *Officials responsible for product pricing*
 - *Officials responsible for product reimbursement*
 - *Officials responsible for placement of products on hospital formularies*

Q&A

Quintiles hired an agent to help on a project and he demanded an additional, large cash payment in order to get a government approval we need quickly. If we do not get the approval, we will miss a project deadline. What should I do?

This is an unusual request. Do not make the payment without knowing how the agent will use the money and you must be sure the agent does not use the money for an improper purpose, such as a bribe. Contact the Legal Department or the Business Ethics Office for more assistance.

A client wants to conduct a study for a marketed product and does not plan to use the data for any scientific purpose. Is this a cause for concern?

Yes. This sounds like a “seeding study” that is designed to induce doctors to prescribe the product. Quintiles policy requires that prior to working on studies with marketed products, certain checklists must be completed and they may need to be submitted to the Anti-kickback Compliance Officer for review.

Additional Guidance

*Corporate Policy No. 007
Anti-Bribery; Anti-Corruption*

*Finance Policy 11.01
Compliance with the Foreign
Corrupt Practices Act*

*Global Gift and Entertainment
Policy*

Legal Department

Business Ethics Office

Anti-kickback Compliance Officer

Internal Audit



Gifts and Entertainment

The occasional exchange of modest gifts, meals or entertainment can help build business relations. However, the giving or accepting of inappropriate gifts and entertainment can harm our business. It may also be illegal. Gifts should never affect your objectivity or be used to sway another person's decisions.

Employees may give and receive gifts of nominal value. Gifts of "nominal value" are valued at USD\$100 or less (or local buying power equivalent); they are unlikely to be seen as influencing behavior. An example is an occasional promotional item such as a pen, visor or coffee mug. Gifts and entertainment must meet the requirements of our Global Gift and Entertainment Policy.

Do not offer gifts to government officials or employees. They may include doctors employed by public institutions such as government-owned hospitals. Contact the Legal Department to find out if a person is a government official.

Special laws and rules apply to gifts to healthcare professionals. It is Quintiles policy to comply with all such restrictions.

It is okay to give or get an occasional meal or entertainment ticket. However, it must not cost more than USD\$300 (or local buying power equivalent) per person; and it must otherwise meet the requirements of the Global Gift and Entertainment Policy.

If you are not sure about giving or receiving a gift or entertainment, talk to your manager, Human Resources or the Business Ethics Office. If you are unable to ask for guidance, do not give the gift or politely decline the gift.

Additional Guidance

[Global Gift and Entertainment Policy](#)

[The Business Ethics Office](#)

Q&A

May I buy a gift for a physician who is managing a study for Quintiles?

There are very few situations where it is okay to give a clinical investigator a gift. Many laws and rules apply to giving gifts, including meals, to physicians. It is Quintiles policy to meet all such restrictions. Other company policies, such as those about anti-kickback, place more limits on gifts to physicians. You must follow industry guidelines such as the PhRMA Code on "Interactions with Healthcare Professionals" as well. Finally, our clients and those who employ doctors often have their own policies on physician gifts. If any of these standards conflict, you must follow the most restrictive standard.

Our Gift and Entertainment Policy limits the cost of entertainment I can get from a vendor. How am I supposed to know whether an event or dinner with a vendor will exceed \$300 (or local buying power equivalent)?

Be proactive before accepting invitations from vendors. Before accepting an invitation to a dinner or other event, tell the vendor about our policy. Then ask for some basic information about the event. Vendors should be respectful of our policy as we should be of theirs.



Antitrust and Fair Competition

Quintiles competes vigorously and fairly for all business prospects based on the merits of our products and services. Being compliant with laws on business competition is key to meeting this commitment. Fair competition laws are complex. They are sometimes called “antitrust,” “monopoly” or “cartel” laws and they vary from country to country. These laws promote fair business competition. They require companies to compete independently and not engage in activities that may limit trade. Antitrust and competition laws are strictly enforced. Violations may cause harsh penalties to Quintiles and employees.

Communications with Competitors

We must never even appear to agree with a competitor on limiting our joint competition. Except during approved discussions (like ones covered by trade association rules), do not communicate with competitors on sensitive topics such as:

- > *past, present or future prices*
- > *pricing policies*
- > *discounts*
- > *marketing strategies*
- > *expansion plans*

Speaking and Writing

Be careful how you speak and write. Legal actions often involve questions of intent and motive. Documents and messages that are poorly worded can be misread. Examples of statements to avoid include, “We will crush the competition” or “I can’t wait to put them out of business.”

Monopolies

It is usually illegal to use monopoly power. In markets where our services are dominant, you should avoid actions that may seem to have monopolistic intent. An example is giving discounted services to some customers and not others. Another is selling services below our cost to the harm of our remaining competitors.

Exclusive Arrangements

Exclusive arrangements are problematic. They are not consistent with Quintiles contracting policies. Examples include agreeing not to work with a competitive drug or asking that a vendor only work for Quintiles. These kinds of potential agreements must be carefully reviewed from a business and legal view. They require the prior approval of the Legal Department.

Trade Association Activities

Trade association meetings and other industry gatherings serve legitimate business purposes. However, they can pose risks as competitors often attend and discuss topics of mutual concern. Trade associations often have procedures in place for sharing information. Be sure to follow such procedures. At trade association meetings, you should be careful not to discuss sensitive topics (such as pricing or vendor criticism) with competitors. This applies especially to social functions or other informal gatherings.

Competitive Information

Information on competitors is a valuable business tool. However, it must be publicly available and obtained from public sources. These sources include websites, public presentations, journal articles or ads. Do not get competitive information illegally or in any improper way. Also, do not lie about who you are or for whom you work. Always keep the information of our customers, suppliers and competitors confidential. Do not use their employees as sources of non-public information. Do not discuss the confidential information of a former employer. No one at Quintiles should ask you to give such information.

Additional Guidance

[Corporate Policy No. 012 Antitrust and Fair Competition](#)

Legal Department

Q&A

My cousin works at a competitor and wants to exchange price information. He only wants the information for benchmarking purposes. Is this okay?

No. Quintiles prohibits exchanging price information with a competitor. This is highly confidential information and if given, could create the appearance of an agreement to fix prices.

At a trade show, I was with a group of people who began to talk about discount pricing and marketing strategy. I became concerned and asked them to stop discussing this topic. Did I do the right thing?

Yes. If a competitor tries to talk about such topics, stop the discussion immediately and, if necessary, leave the area.



Industry gatherings serve legitimate business purposes. However, they can pose risks. At trade association meetings, you should be careful not to discuss sensitive topics (such as pricing or vendor criticism) with competitors.

International Trade Controls

We are a global company with offices around the world. We must conduct business in compliance with trade regulations, including export and import controls. Trade controls are complex and vary widely. You should raise any questions to the Legal Department or the Business Ethics Office.

Examples of trade control regulations we must follow include:

Export / Import Control Laws

Export and import control laws apply to many goods and technical data (including software). They can apply to items that are hand-carried and may need prior approval, licensing and reporting. Transfer of technical data to foreign nationals living in the US (including Quintiles employees) may be a “deemed export.”

All goods that are imported must be accurately classified to determine any duty owed.

Sanctions

Sanctions and trade limits exist against a number of countries. They may restrict our ability to do business in certain areas.

Denied Parties

There are restrictions against doing business with some people, groups or organizations. They include those designated as terrorists or those supporting terrorism, or drug traffickers.

Prohibited Activities

Quintiles prohibits doing business with persons who may be involved in activities such as chemical or biological weapon development.

Anti-Boycott Restrictions

Laws prohibit Quintiles from participating in certain international boycotts of countries friendly to the US. A current example is the boycott by certain Arab nations of Israel. These laws prohibit entering into agreements that have the effect of supporting such boycotts. They also do not allow giving information for boycott-related purposes.

Further Guidance

Legal Department

Business Ethics Office or HelpLine

Vendors and Suppliers

Our suppliers are important to our success and high quality cost effective suppliers help us meet our commitments to clients. We choose suppliers based on price, quality, delivery, service and reputation. All suppliers must do business activities for or on behalf of Quintiles with standards and values that align with our own. In particular, Quintiles opposes the use of forced or exploitative child labor and we expect suppliers to respect and follow this principle.

We respect the terms and conditions of supplier agreements and we strive to pay on time and to protect the confidential information of our suppliers.

When engaging or dealing with a supplier, you must:

- > *ensure suppliers are reputable and qualified*
- > *treat suppliers with honesty, fairness and respect*
- > *meet our requirements for evaluating and approving suppliers*
- > *avoid creating an actual or apparent conflict of interest*
- > *obtain competitive bids when needed*
- > *pay suppliers only for contracted services*
- > *pay suppliers only after getting a reasonably detailed invoice describing those services*
- > *not make payments to a supplier if you believe the payment may result in a bribe*
- > *ensure any supplier receiving personal or confidential customer data will protect such data to at least the same standards as Quintiles'*

Quintiles' Vendor Management program reviews the products or services provided to us and it helps to verify that they meet our quality, data protection and regulatory compliance standards. Quintiles' Vendor Management program is run by the Systems Compliance office with support by the Legal Department.

Additional Guidance

Vendor Management Program
QZone site: [Vendor Management](#)

Systems Compliance Office

Global Gifts and Entertainment Policy

Corporate Policy No. 007
Anti-Bribery; Anti-Corruption

Doing the *Right* Thing

Our Standards: In the Workplace

Respectful Workplace

We strive to create a productive work environment that exhibits teamwork and trust. This means that we treat each other and anyone we interact with while working for Quintiles with respect and dignity.

Diversity and Non-Discrimination

We are an equal opportunity employer. We make employment decisions based on qualifications and merit. We prohibit discrimination based on any unlawful consideration such as age, race, national origin or gender.

Harassment

We each are responsible for maintaining a workplace free from harassment. "Harassment" includes acts that can create an offensive, intimidating or hostile work environment. Harassment can:

- > *be physical or verbal*
- > *take place in person or by other means, such as email*
- > *be sexual in nature or otherwise inappropriate*
- > *include jokes, kidding or teasing*



Harassment (cont'd)

Types of conduct prohibited by our policy include:

- > slurs, off-color jokes or disparaging comments about such subjects as race, religion or gender
- > intimidating acts based on a person's "protected status" (see sidebar)
- > circulation or posting of items that show hostility towards a person or group
- > the display of sexually suggestive objects or pictures
- > offensive physical contact such as grabbing, pinching or brushing against another person's body

Reporting Discrimination or Harassment

If you experience or see conduct that you think is not in line with Quintiles' policies, tell your manager or Human Resources Representative. You can contact the Business Ethics Office or the Legal Department if you are uncomfortable with speaking to a local resource.

California: Please know that the Federal Equal Employment Opportunity Commission and the California Department of Fair Employment and Housing investigates and may prosecute harassment complaints.

Q&A

My co-worker often talks about a colleague's disability. She then covers it up by saying, "I'm only kidding." Is that okay?

No. These actions are not consistent with our standards. Your co-worker needs to understand that her comments are not appropriate. You can do this yourself, or ask a manager or Human Resources Representative to address the situation.

In my country, sexual harassment is not against the law. Does Quintiles policy against sexual harassment apply in my office?

Yes. Quintiles policies on discrimination and harassment apply to all of our offices around the world. We must show respect to all of our colleagues at Quintiles. Talk with your Human Resources Representative if you are not sure if certain conduct meets our values of dignity and respect.



Further Guidance

[Global Employee Policies](#)

[Equal Employment Opportunity Statement](#)

[Sexual Harassment and Anti-harassment Policy](#)

[Local employment policies](#)

[Local Human Resources Representatives](#)

[Legal Department](#)

[Business Ethics Office or HelpLine \(where permitted by law to raise workplace conduct issues\)](#)

"Protected status" includes, race, color, gender, religion, marital status, age, national origin, disability, medical condition, veteran status, gender identity, sexual orientation or any other characteristics protected by law.

Workplace Health and Safety

We are committed to providing a safe and healthy workplace. You have an active role in helping ensure a safe and secure work environment. You must follow all safety and security rules and procedures that apply to your location and participate in required training.

You should promptly report hazardous situations or other risks to the correct department for your location. You should also know the emergency and evacuation actions and telephone numbers for your work location. Always wear any protective equipment or clothing assigned to your work.

Quintiles does not tolerate acts of violence or threats of violence towards individuals or Quintiles. We prohibit weapons of any type. You must not bring weapons to any Quintiles-sponsored activity or onto our property (this includes parking lots and company vehicles).

If you become aware of a threat or act of violence, promptly report it to Security, your manager or Human Resources Representative.

Drugs and Alcohol

Being under the influence of alcohol or drugs may lead to situations that endanger you or those who work around you. You may not work while under the influence of alcohol, illegal drugs or controlled substances. You cannot possess, sell or distribute illegal drugs while on company premises, work sites or at Quintiles-sponsored events. This includes during meals or break periods.

Drinking alcoholic beverages at Quintiles-sponsored events or meals may occur if approved by local management and only if it does not endanger yourself or others, impair your ability to do your job, or adversely reflect on Quintiles.

Additional Guidance

[Corporate Policy No. 015
Environmental, Health, Safety and
Security](#)

[Workplace Violence and Threats
Policy](#)

[Global Safety, Security and Travel
QZone site](#)

Q&A

A co-worker's drinking gets out of control during team dinners. She often makes loud, inappropriate comments and sometimes clients are present. This behavior makes me very uncomfortable but I am afraid to confront her. What do you suggest I should do?

If your co-worker is drunk, she may endanger the well-being of herself or the others around her. Being drunk in the presence of clients reflects poorly on her and on Quintiles. Speak to a manager or contact local Human Resources as soon as possible.

I have a substance abuse problem. Can Quintiles help me get treatment?

If you have a problem with alcohol or drugs, you are encouraged to seek help by contacting counseling professionals available through Quintiles support programs.



Conflicting Personal Interests

We respect your right to be involved in personal activities outside the scope of your job as long as they do not get in the way of your work responsibilities. You must avoid any activity or relationship that might conflict — or appear to — with Quintiles' interests. Such a situation can arise in a variety of ways.

In the following sections, we'll describe situations where personal conflicts of interest often arise. However, this list does not cover all possible situations where such conflicts might occur.

Financial Conflicts of Interest

A conflict of interest may arise if you, your relative or close personal relation have a financial interest in; a job with; or serve on the Board of Directors of a customer, potential customer, competitor, supplier or vendor of Quintiles.

A conflict of interest may exist if you or a relative directly or indirectly have "significant financial interest" in any company that competes, does business or seeks to do business with Quintiles.

Other financial interests could be significant. That is why you must disclose virtually any financial interest in such organizations to your manager and the Legal Department. This does not apply to a personal investment in publicly traded mutual funds that may include the stock of a customer, vendor or competitor of Quintiles.

Outside Employment

It is sometimes permissible for you to have a second job or be self-employed while working for Quintiles. Any such second job or self-employment must not:

- > *compromise Quintiles' interests*
- > *negatively affect your job performance or*
- > *restrict your ability to meet your responsibilities to Quintiles*

If you work or are thinking about working in a second job, you must first get approval from your Human Resources Representative.

A "significant financial interest" generally means ownership by you and/or your family members of:

- > *more than one percent (1%) of any class of securities of a corporation or*
- > *in an amount that is more than five percent (5%) of the total assets of you and/or your family members*

Family Members

There may be a conflict of interest if a family member, domestic partner or other close personal relation works for a Quintiles competitor, customer, vendor or supplier. It may also be a conflict of interest if such person can sway the sale of goods or services to Quintiles. You must disclose any such situation to your manager.

It is usually permitted for Quintiles to employ family members as long as they have no direct or indirect reporting relationship. Contact Human Resources prior to hiring, transferring or promoting anyone with family members that work at Quintiles.

Serving on Boards of Directors

You must get approval from the General Counsel's office prior to serving on a for-profit corporation's board of directors. You do not need consent for a family business or personal financial management ventures.

Disclosure

You must disclose potential personal conflicts of interest when they arise. You must also take any actions deemed by Quintiles as being necessary to address your situation. Most conflicts of interest can be resolved in a mutually acceptable way.

Further Guidance

Human Resources

General Counsel's Office

Business Ethics Office or HelpLine

Q&A

I work in the site startup group. My wife is a cardiologist with experience in conducting clinical studies. May I submit her name for consideration as a Principal Investigator for a Quintiles managed study?

Yes. However, you must disclose your relationship and you should not have any role in the decision on whether to use her services or in any contract negotiations. You must take any necessary steps to manage the conflict.



It is usually permitted for Quintiles to employ family members as long as they have no direct or indirect reporting relationship. You must disclose potential personal conflicts of interest when they arise. Most can be resolved in a mutually acceptable way.

Company Property

We must protect the physical and intellectual property and financial assets of Quintiles.

Physical Property

We each must do our part to maintain and secure Quintiles facilities and equipment against theft and misuse. You may only use Quintiles property for valid business reasons unless approved for another use.

Email, Mobile Devices and the Internet

Quintiles provides a wide range of electronic devices and systems to help you work effectively. Appropriate use of such devices and systems is required. We have specific policies on the appropriate use of email and Internet access.

Occasional personal use of electronic devices and systems is permissible unless such use:

- > *interferes with your work responsibilities*
- > *leads to excessive costs or*
- > *violates the standards in this guide or in any Quintiles policy or procedure*

Do not assume that any messages sent over such systems are private. They may be seen or heard by someone other than the person receiving the message. Subject to legal requirements, Quintiles may access information from these systems, with or without notice to you.

Confidential Information

Quintiles considers confidential information a valued business asset. We each must sign a Confidentiality Agreement as part of our work with Quintiles. Those agreements and our policies usually ban you from giving confidential information on Quintiles or our customers to anyone outside the company without appropriate authorization.

We each have an obligation to protect confidential information. You must:

- > *be careful when speaking in public places such as airports, restaurants or when using mobile telephones*
- > *not share confidential information outside Quintiles unless the third party has signed a Confidentiality Agreement approved by the Legal Department*
- > *share confidential information only on a “need to know” basis to others working for or on behalf of Quintiles*
- > *double check addresses in emails and fax numbers prior to sending confidential information*

If you fax, email or mail confidential information to the wrong address, tell your manager promptly. Then take steps to retrieve the information or have it deleted or destroyed by the recipient. Also, report the situation to the Privacy Incident Response Team.

“Confidential information” includes information that is not generally disclosed. It is useful and/or gives the Company an advantage over competitors. Typical examples include:

- > unpublished financial data*
- > human resources data*
- > business processes, plans and strategies*
- > computer software programs, programming and source code*
- > customer and employee lists or*
- > business methods or systems*

Intellectual Property

Intellectual property (IP) is a valuable asset. “IP” refers to creations of the human mind protected by law. It is our policy to protect our own IP and not to infringe on the IP rights of others. We are each required to sign a Work Product Agreement that states, in part, that any IP created by you in the course of working for Quintiles belongs to Quintiles.

To help protect IP you must:

- > *not copy, distribute or change copyrighted materials, without permission from the copyright owner or its authorized agent such as the Copyright Clearance Center*
- > *use only properly licensed software in connection with our business*
- > *properly acknowledge and use Quintiles’ trademarks and follow the requirements of our brand resources*
- > *keep the secrecy of innovations for which Quintiles will seek or is seeking patent protection*

Q&A

Someone stole my laptop. What should I do?

Immediately report the theft to the IT Global Service Desk, local law enforcement and PIRT (so they can assess whether personal or confidential customer data was on the laptop and whether it was encrypted). Quintiles tracks these incidents as part of our policy and it is also legally required in many locations.



IP includes copyrights, trade secrets, trademarks, patents, know-how and technical knowledge.

Further Guidance

Corporate Policy No. 005

[Confidentiality](#)

[Brand Resources](#)

[Electronic Mail Policy](#)

[Internet Policy](#)

Legal Department

[Global Marketing](#)

Report any disclosure or loss of confidential information to the Privacy Incident

Response Team (PIRT):

data.protection@quintiles.com

1-877-998-2100

Accurate Business Records

Many people rely on the integrity of our business records. They are used to create reliable and accurate reports. We give these reports to management, customers, governmental agencies and others.

Financial Reporting

Quintiles has a system of accounting controls to help protect Company assets. This internal system also assures the accuracy of financial records and reports. You need to follow all accounting policies and procedures. This includes expense reporting.

Financial transactions are to be reported accurately, completely and fairly. They must be done on time and in an understandable way. The data we give to create financial statements, regulatory reports and publicly filed documents must meet with all applicable accepted accounting principles. It also must meet our internal control procedures.

If you feel pressured to create, change, hide or destroy financial information, report this violation to your finance representative, Internal Audit or the Business Ethics Office. Report any other improper transaction or accounting practice to one of these resources.

Business Records

Accurate business records are key to the management of Quintiles. All of our books and records need to correctly record business transactions. It is important that you truthfully record business information. This includes timesheets and expense reports. All documents you create should accurately reflect the facts of a situation. They must be free of inappropriate language or derogatory comments. This applies to all communications including email, voice mail, daily planner notes and memos. Never make a false entry in any Quintiles book or record for any reason.

The preservation of records is vital to our business. All documents and records, no matter how they were created or stored, must be maintained per our records management policy and procedures. Retain company documents in the manner and for the period specified by:

- > law
- > customer contract (if longer) or
- > in accordance with the record creation and retention policies

Q&A

My manager asked me to report that my sales calls took place on Thursday and not Friday, when they occurred. Friday was the start of a new quarter and I think my manager wants it to appear we met last quarter's sales targets. How should I proceed?

We must account for all services in the period in which they occurred. Your manager is asking you to create an inaccurate record. You should not follow this instruction. You should report the situation to a different manager, Internal Audit or the Business Ethics Office.



Further Guidance

[Corporate Policy No. 002
Suspected Fraud and Misconduct](#)

[Corporate Policy No. 016
Corporate Financial Reporting](#)

[Financial Policies and Procedures](#)

[Internal Audit: +1 919-998-2593](#)

[Corporate Policy No. 008
Records Management, Retention
and Archiving](#)

[Global Record Retention Schedules](#)

Inside Information and Securities Trading

It is illegal for you to trade or tell others to trade in the securities of any company based on any non-public, Material Information. It is also against our policy. You may be criminally liable if you use Material Information that is not public to buy or sell stock. You may be subject to criminal liability if you disclose such information.

The trading restrictions based on Material Information apply no matter how you got the information. These restrictions will still apply even after the termination of your employment with Quintiles.

Q&A

I overheard someone talking about the poor results of a client's clinical trial. My brother owns stock of that client. I think it is OK to tell him what I heard since I am not the one who will directly benefit. Am I correct?

No. Such information is "Material Information" and you must not disclose it to anyone before it is made public.



"Material Information" or "inside information" is information which could affect a company's stock price or which an investor would think important. Examples include information regarding:

- > earnings*
- > major litigation*
- > major expansion or end of operations*
- > potential acquisitions or divestitures*
- > the gain or loss of a significant contract*

Other items may be "Material Information." It depends on the circumstances.

Additional Guidance

*Corporate Policy 006
Security Trades by Company
Personnel (Insider Trading)*

Legal Department

Supporting our Communities

Quintiles is committed to supporting the communities in which we work and live. Quintiles employees have volunteered their time and resources to help make a positive difference. Quintiles has chosen to focus our community and philanthropic activities in three core interest areas:

- > *women in science*
- > *education in life sciences and biostatistics*
- > *health and fitness*

Quintiles Cares is a series of initiatives that support our activities and programs in community outreach. Q&ME is our program for matching employees' qualified contributions. You can send your requests for corporate contributions to QuintilesCares.com.

Protecting the Environment

We are committed to protecting our environment. We strive to minimize any negative effects our work might have on the environment. To help us meet these goals we each must:

- > *manage our energy usage*
- > *conserve and protect natural resources*
- > *follow procedures that apply in our location on activities that may affect the environment*
- > *minimize environmental hazards*
- > *meet environmental laws and regulations that apply to our business*

If you find out about any potential environmental accidents, let us know immediately. Also, report any suspected violations of environmental laws. Tell the correct department for your location or your manager about either of these situations.

Further Guidance

[Quintiles Cares](#)

Policy No. 015

[Environmental, Health, Safety and Security](#)

Global Environmental, Health and Safety: +1 919-998-2113

[Global Environmental, Health and Safety](#)

Public Information

Our reputation depends on giving correct, timely and consistent information to the public. Following these guidelines will help protect our hard-earned reputation:

- > **Media relations** — We value our relationship with the media. Only designated people are allowed to speak with the media. Unless you are authorized to speak on our behalf, promptly send any media inquiries to Corporate Communications
- > **Advertising and promotion** — We must describe our products and services in an accurate manner. Before you use Quintiles' name or your tie with us in an endorsement or promotional activity, you must speak with Global Marketing
- > **Public presentations and articles** — As a Quintiles employee, we encourage you to give public presentations on your work. You can also publish articles related to your work. You must get them reviewed by the Legal Department and Corporate Communications prior to use or publication
- > **Legal disputes** — Quintiles, like any large company, may become involved in legal disputes. You must promptly contact the Legal Department if you get a legal document about Quintiles. These documents include a subpoena, a summons or a letter from an attorney. Never threaten or begin legal action for Quintiles without the consent of the General Counsel
- > **Company financial information** — We are a private company. Thus, Quintiles financial data is not available to the public. All disclosures of our financial information must be approved by Legal and Finance. To know the request process, read the policy on Confidential Protection of Quintiles Financial Information

Additional Guidance

Corporate Policy No. 010
[Media Relations Responsibilities](#)

Corporate Policy No. 017
[Company Legal Matters; Engaging Outside Legal Counsel](#)

Policy on [Confidential Protection of Quintiles Financial Information](#)

Corporate Communication

[Global Marketing](#)



Government Relations

Political Contributions and Activities

We encourage you to exercise your rights of citizenship. By this we mean you can vote, give political contributions or volunteer time to support your choice of parties or candidates. However, you must do all such activities on your own time and with your own money or resources. Laws may not allow payment of corporate funds or use of company property for the benefit of a political party, candidate or campaign. You may not use work time or Quintiles resources to support candidates or political campaigns. Examples include money, copier machines or stationery.

Government Contracting

When we provide services to a government agency, we take on more responsibilities than with private business transactions. For example, for the US government we must meet some Federal Acquisition Regulations (FARs). You must be sure that certifications or representations made to any government agency are accurate. They must also be reviewed and approved by the Legal Department before being signed by an authorized Quintiles officer. For US government agencies, we have to disclose any known event of fraud, conflict of interest, bribery or overpayment. We also have to report and return any overpayment on a government-funded project.

Interacting with Government Officials

Our employees around the world regularly deal with government officials in their regions. This includes officials from agencies that regulate our business. Certain laws and regulations apply to the way in which we may interact with government officials. These laws may prohibit or limit the giving of hospitality, entertainment or gifts to such officials. It is our policy to meet all such requirements. If you interact with government officials on behalf of Quintiles, you must know and meet such laws and regulations.

You must follow our policies and procedures when hosting any government inspection. You must also notify the Global Quality Assurance Department of the inspection.

Further Guidance

*Government Contractor Ethics
Rules: Legal Department*

Global Quality Assurance

*Global Gift and Entertainment
Policy*

Red Flags

Using or hearing the following, or similar, phrases may mean that a questionable activity has occurred or may be taking place.

“Everyone does it.”

“No one will ever know.”

“I’ll never do this again.”

“We’ll do whatever you want if you’ll give us your business.”

“We didn’t have this conversation.”

“Just make sure no one sees that document again.”

“The ends justify the means.”

Consider the Alternatives

When faced with a decision that might involve you or others in questionable activities, stop and think. If you are not sure about a particular situation, ask yourself the following questions.

“Are my actions legal?”

“What will I think about myself afterwards?”

“What would my family or friends think about what I was doing?”

“How would it look in a newspaper article or on TV?”

“Are there any alternatives to my actions?”

If you know it is wrong — DO NOT DO IT.

If you are still not sure — ASK FOR GUIDANCE.

Raising Concerns

If you become aware of activities that are not consistent with the standards set forth in *Doing the Right Thing*:

1. First, try to resolve your concern with your manager, another manager or your Human Resources Representative.
2. If resolution through such channels is not suitable or if you have already taken this step and feel the issue was not resolved, contact one of the other resources in this guide or in the “Help and Information” section.

For more information on topics in *Doing the Right Thing* or to discuss an area of concern, contact one of the resources listed in this guide or in this section.

We each have an obligation to help protect the integrity and reputation of Quintiles. You must raise perceived violations of our standards where the interest of Quintiles or the moral or physical integrity of our people or assets are at stake. They can include:

- > *potential fraud*
- > *financial controls and accounting practices issues*
- > *corruption*
- > *other serious concerns*

As a first step, you should seek out local management or resources for help in addressing concerns. Alternatively, you may contact the Business Ethics Office or any of the resources listed in this guide.

Quintiles has a non-retaliation policy, making it safe for you to raise concerns. However, anyone who knowingly makes a false accusation or knowingly gives false information may be subject to disciplinary action.

We treat all communications seriously and with courtesy and discretion. If needed, we will do an investigation and take any necessary corrective action.

Local Resources

- > *Your supervisor or another manager*
- > *Your Human Resources Representative*

Quintiles has a non-retaliation policy, making it safe for you to raise concerns.
For more information on *Doing the Right Thing* or to discuss an area of concern, contact one of the resources listed in this guide.

Global Resources

Business Ethics Office

The Business Ethics Office is a corporate resource available to answer questions, provide guidance or help address concerns relating to the standards set forth in *Doing the Right Thing*.

> *Business Ethics Office Phone number: +1 608-848-8810*

This telephone line (including voice mail) cannot identify from where in-coming calls originate. You do not have to give your name when calling this number

> *Business Ethics Office Confidential Fax No.: +1 608-848-8811*

> *Business Ethics Office email: business.ethics@quintiles.com*

Email sent to this account goes directly to the staff of the Business Ethics Office. This communication method does not have the capacity of anonymity

Quintiles Business Ethics HelpLine and Website

The Ethics HelpLine and Website are available 24 hours a day, 7 days a week. They are operated by a third-party vendor. You may dial the toll-free number for the Helpline or file a report online. Translation services are available upon request if you are more comfortable speaking in a language other than English.

Use the Ethics HelpLine or the Website to:

> *request guidance about our standards for ethical business conduct*

> *report a concern related to those standards or*

> *get help in decision-making when facing an ethical concern*

You may remain anonymous, although you are encouraged to identify yourself. An outside service provider operates the HelpLine and hosts our Website.

Business Ethics HelpLine Phone Numbers:

Inside the US — + 1 866-738-4427

Outside the US — Check the Business Ethics Office QZone site for your country's toll free number. Dial that number and when directed, dial 866-738-4427.

To access the Business Ethics HelpLine Website: <https://www.integrity-helpline.com/Quintiles.jsp>.

Call Handling

The Business Ethics Office receives all reports made to the HelpLine or Website.

The Business Ethics Office treats individual's identity confidentially and shares it with only people who are responsible for dealing with the report, any investigation or as required by law. The Business Ethics Office holds and uses personal information in accordance with Quintiles data privacy policies and data privacy laws.

You are not required to identify yourself. If you choose not to give your name, our ability to investigate the matter may be impaired and we may not be able to address your concerns.

Limits on Contacts from Europe

Due to data protection regulations, the types of matters the Business Ethics Office or the Business Ethics HelpLine may process are limited to certain matters [see sidebar for a list of such matters].

European employees should address other concerns to their local resources including employee representatives and Human Resources.

Conclusion

We each have an obligation to practice good business ethics. This guide cannot cover all the rules and regulations that apply to every situation. However, the values and requirements summarized here can help you make the right decision. Each of us is expected to behave ethically even in the absence of a specific company policy. Our reputation and continued success depend on the decisions you make every day.

We are each responsible for our own actions. No illegal or unethical act can be justified by claiming that higher management or a client ordered it. You always have resources to contact for assistance such as those listed in this guide and the "Help and Information" section.

Violation of any of our standards or policies may result in disciplinary action that could include dismissal and / or legal action.

DO YOUR PART. DO THE RIGHT THING.

Contacts from Europe are limited to the following types of matters:

> Matters relating to serious risks to the company in the fields of accounting, financial audit, anti-corruption (bribery) or banking;

> Matters related to:

– Insider trading

– Conflict of interest

– Serious environmental breaches or threats to public health

– Disclosure of company or client confidential information

– Serious risks to the company's information system security; or

> Matters which may affect the vital interests of the company or an employees' physical or mental integrity such as a threat to the safety of another employee, moral or sexual harassment and discrimination (where these have not been dealt with locally).

This document may change from time to time. To review the most current version, visit the Ethics and Compliance homepage on QZone or email the Business Ethics Office.

If you are unable to access QZone or any information in this guide provided via “links,” email the Business Ethics Office for assistance at business.ethics@quintiles.com.

This guide is not an employment contract between Quintiles and its employees.

Other Quintiles materials, such as Employee Handbooks or employment contracts, may cover some of the responsibilities discussed in this guide in more detail. More restrictive standards may also apply in local offices. If there is a conflict between standards, the more restrictive standard applies.

Contact Us:
On the web: www.quintiles.com
Email: business.ethics@quintiles.com

