Global Anti-Corruption & Anti-Bribery Policy

If you have accessed this Policy to identify Worldwide's reporting mechanisms, please consult Section 5 below.

1. Introduction

This document outlines the Global Anti-Corruption & Anti-Bribery Policy established by Worldwide Clinical Trials ("Worldwide"). You are responsible for reading the entire document thoroughly and complying with all requirements. The policy underscores Worldwide's commitment to ethical business practices, honesty, and fair competition across all countries where it operates. With a zero-tolerance stance on bribery and corruption, the policy mandates compliance with legal frameworks like the U.S. Foreign Corrupt Practices Act (FCPA), the U.K. Bribery Act (UKBA), and other relevant anti-corruption laws.

The policy applies to all Worldwide employees, directors, board members, and third parties acting on behalf of the company. It sets forth expectations for ethical conduct, requiring employees to report any suspicions of violations. Managers are tasked with enforcing the policy and ensuring that it is understood and adhered to by those under their supervision.

Furthermore, the document defines critical terms like "Anything of Value" to clarify the scope of prohibited activities, which include offering cash, gifts, travel, or other advantages that could influence professional decisions. Through this policy, Worldwide aims to maintain transparency and uphold its responsibilities to sponsors, trial participants, vendors, and government authorities, fostering trust and ethical collaboration in all operations.

1.1. Purpose

Worldwide Clinical Trials ("Worldwide") and its affiliates are committed to maintaining the highest standards of ethical conduct. This includes ensuring all Employees and Representatives act in compliance with the laws of the countries where Worldwide operates. Ethical business practices, honesty, and fair competition form the foundation of Worldwide's reputation. To uphold these values, Worldwide has established this Global Anti-Corruption and Anti-Bribery Policy, which applies to all employees, directors, board members, and third parties working on behalf of Worldwide or its Sponsors. Worldwide has a zero-tolerance policy towards bribery and corruption. Employees and Representatives are required to comply with laws like the U.S. Foreign Corrupt Practices Act (FCPA), the U.K. Bribery Act (UKBA), and anti-corruption laws in other countries where Worldwide operates. These laws apply to activities in any country and to all employees, regardless of their residency or nationality. These guidelines serve as the minimum standard, with local legal requirements taking precedence when applicable.

1.2. Scope

The Policy applies to and governs the conduct of Worldwide Employees and others acting on behalf of Worldwide in all countries where Worldwide operates. Worldwide Employees are

required to read, understand, and comply with this policy. In addition, Worldwide managers are required to enforce the policy and ensure that people and entities under their supervision understand and adhere to this policy. Because Worldwide may be liable if its Employees know or should know that someone acting on our behalf is violating applicable Anti-Corruption and Bribery laws, Employees are required by this Policy to report any suspicions of such violations in accordance with the Reporting Mechanisms in this Policy. All Worldwide affiliated companies and subsidiaries, as well as the employees of such entities, must comply with this policy. The Policy reinforces Worldwide's responsibilities to sponsors, trial participants, investigators, vendors, government authorities, and each other to ensure ethical collaboration and transparency in all professional engagements.

1.3. Definitions

This section aims to define various terminologies used throughout this policy, including relevant examples.

Term	Definition
Anything of Value	Refers to a broad range of items including cash, gift cards, tangible items, meals, entertainment, travel, lodging, transportation, loans, forgiveness or payment of expenses, charitable or political contributions, job offers, consultant contracts, or any **financial or other advantage. It also includes value given indirectly to related parties such as family or friends.**
Bribery	The act of offering, giving, promising, soliciting, or accepting Anything of Value to improperly influence a person in their duties or to gain an undue business advantage. This can involve payments or other benefits.
Corruption	The abuse of power for private gain, undermining fairness, integrity, and transparency. For example, a compliance officer influencing regulations for personal benefit is an act of corruption.
Conflict of Interest	A situation where an individual or organisation must choose between their responsibilities and their private interests, potentially leading to biased decisions.
Fraud	A dishonest act involving false representation to gain an unfair advantage or cause loss to others. Examples include providing false information on financial statements, contracts, or other documents.

Public Official	Healthcare professionals (HCPs) in government or state-owned healthcare institutions, officials and employees from all levels of government, individuals affiliated with political parties or public international organizations, and associates or family members of these individuals are considered Public Officials under this Policy.

1.4. Roles and Responsibilities

Worldwide Clinical Trials has assigned the roles and responsibilities in the table below to ensure all objectives and measures described in this policy are achieved to the best of our ability and to ensure the policy is effectively implemented.

Role	Responsibilities
Employees	Responsible for reading the following policy, acting in accordance with this policy, and reporting any (possible) breaches immediately.
Leaders	Responsible for communicating applicable measures throughout the company and providing the means to support their implementation. Leaders are also responsible for escalating possible breaches of this policy.
Policy Owner	Responsible for the implementation and monitoring of the policy. The Policy Owner must review and update the policy on an annual basis and respond to all requests and inquiries. Department: Legal Department Contact details: Legal@worldwide.com

2. Policy

Consistent with laws around the world, we at Worldwide do not promise, offer, give, accept, or authorize the giving or receiving, directly or indirectly, of a bribe or "Anything of Value" (defined above) to or from ANYONE to improperly influence any act or decision, to obtain or retain business, or to secure any other improper advantage for Worldwide.

2.1. Bribery and Corruption

Worldwide has a zero-tolerance approach towards all forms of Bribery and/or Corruption and prohibits the following conduct:

2.2 The giving or receiving of bribes

Worldwide and its Employees and Representatives acting on behalf of Worldwide must not, directly or indirectly, make, promise, authorize, offer or provide Anything of Value to any

person, regardless of the status of the recipient, for the purpose of obtaining or retaining business, to improperly influence a decision or for a competitive business advantage. This is true when dealing with both private individuals and public officials, domestic or foreign.
Worldwide Employees and Representatives must not solicit, request, or agree to receive or accept, either directly or indirectly, Anything of Value, including any financial or other advantage, that is intended to or designed in any way to induce or reward the improper performance by any Worldwide Employee or Representative of any function or activity.

2.3. Giving or receiving of bribes by or through 3rd parties

When working with third parties, Worldwide Employees and Representatives must not:

i. Offer or give Anything of Value on behalf of Worldwide (or a Sponsor) if they know or suspect it might be used to influence someone, including public officials, to secure business or encourage improper actions.
ii. Ignore evidence or act carelessly in a way that could imply knowledge of improper payments. Reasonable checks must be made when dealing with third parties to avoid such risks.

Additionally, Employees and Representatives must not agree to, assist with, or conspire in any way to break anti-corruption laws, whether directly or through third parties, including Sponsors.

2.4. Public Officials and Healthcare Professionals

Special care is needed when dealing with Public Officials.

Worldwide's Policy requires Employees and Representatives to comply with anti-corruption laws globally, including the FCPA and UKBA, which prohibit bribery of foreign or domestic Public Officials to secure business. It applies to healthcare professionals (HCPs) in both public and private roles, acknowledging the overlap in healthcare sectors. In cases where domestic laws are stricter, they must be adhered to; otherwise, this Policy sets minimum standards that supersede less stringent regulations.

2.5. Facilitation Payments

Facilitation payments are small payments made to low-level Public Officials to expedite or secure the performance of a routine non-discretionary government action (for example, in order to issue a visa). Facilitation payments violate the anti-corruption laws of many of the countries where Worldwide operates. These payments should only be made when a country's government agency offers expedited services to the public. The payments must be accurately and fully documented in Worldwide's books and records.

2.6. Gifts, Entertainment and Hospitality

Worldwide prohibits using gifts, hospitality, travel, and entertainment to influence any person or to obtain or retain an improper business advantage for Worldwide. Employees and Representatives must not offer, give, promise, solicit, or accept any gift, hospitality, or any other thing of value to any person that could be regarded as illegal or improper, violates this Policy, or is intended to improperly affect or influence the business transaction. As outlined in Worldwide's Gifts and Hospitality Procedure, gifts, entertainment and hospitality may only be exchanged, given or received when they are appropriate in value, reasonable, infrequent and documented in accordance with Worldwide's internal procedures. Worldwide values normal and appropriate gifts or hospitality intended to foster positive relationships with our customers, vendors, and suppliers as long as they do not influence our business operations.

2.7. Political Contributions

Worldwide explicitly prohibits political contributions made directly or indirectly to influence, or appear to influence, any external party, including Public Officials, in exchange for any improper business advantage. Worldwide does not make contributions to political parties or officials on Worldwide's behalf for any reason. In addition, Worldwide does not provide reimbursement for any political or campaign contribution. Worldwide Employees are prohibited from engaging in any lobbying activities on behalf of Worldwide, soliciting for political contribution or donations at any time on Worldwide devices, in any Worldwide office, and while performing any work for Worldwide.

2.8. Charitable Contributions

Worldwide prohibits giving charitable contributions and sponsorships on behalf of Worldwide to obtain a business advantage. Any contemplated charitable contributions and sponsorship activity on behalf of Worldwide must be reviewed and approved prior to being given. Contributions or sponsorships involving Public Officials or related entities must be pre-approved by the Legal Department, with due diligence conducted before any donation is finalized. Worldwide does not solicit, accept, or offer donations to third parties in any way that suggests a donation is a prerequisite for future business, or that the offer of a donation is intended to obtain a business advantage. Although giving to or soliciting on behalf of legitimate charitable organizations where our third party is engaged may be permitted, no business advantage is permitted to be associated with an agreement to give. All requests for charitable contributions require prior authorization.

2.9. Supplier Engagement

This Policy is applicable to all Representatives and third-party suppliers engaged by Worldwide. Representatives are required to conduct business operations in full compliance with all relevant laws and regulations. In adherence to Worldwide's Vendor Assessment Standard Operating Procedure, due diligence is conducted prior to the establishment of any business relationship with a Representative, unless the entity is a recognized professional firm or a widely known organization. As part of this process, factors such as the prospective third party's reputation, beneficial ownership, professional expertise, financial stability, history of compliance with anti-corruption laws, and interactions with Foreign Public Officials are

thoroughly evaluated. The engagement will only proceed after verification of the third party by the Director of Contract and Vendor Management.

3. Conflicts of Interest

Worldwide requires Employees to avoid Conflicts of Interest at all times. If a potential conflict arises, Employees must report the conflict to their manager. A review will be conducted, and a determination will be made about the potential conflict. If further action is required, the manager and employee will document the outcome. Employees who violate the Conflict of Interest provisions of this Policy are subject to disciplinary action up to and including termination of employment.

4. Accurate Books and Records

Worldwide requires complete and accurate books and records and complies with the applicable accounting, tax, and financial reporting standards in the jurisdictions in which it operates. Employees must commit to honest and accurate recording of all business transactions, must not commit fraud or make any false or misleading recordings, and shall ensure that any payment or expense is properly recorded and documented in accordance with Worldwide policy.

5. Reporting Mechanism

Worldwide requires Employees to report any known or suspected illegal or inappropriate conduct that may violate this Policy, the Code of Conduct or any applicable law. Any written or oral complaint may be provided to the Legal Department, a member of the People Strategy & Culture Department or via Worldwide's confidential hotline, EthicsLine (accessed through the PSP Intranet site (https://secure.ethicspoint.com/domain/media/en/gui/75192/index.html). Worldwide is committed to thoroughly investigating such reports and taking appropriate actions to address any confirmed violations. Employees and Representatives are encouraged to refer to Worldwide's Whistleblower Policy for a detailed outline on how to report a complaint.

6. Failure to Comply

Employees and representatives who violate anti-corruption laws may subject Worldwide and themselves to substantial criminal and/or civil penalties. Non-compliance with anti-corruption laws and this policy may result in disciplinary action, including termination, by Worldwide against the individuals involved. Such non-compliance may also be reportable to professional bodies regulating Worldwide and may lead to disciplinary actions by those bodies.

7. Training & Accountability

Worldwide will provide anti-corruption training to its Employees, who must certify their review of this policy through the learning management system annually.

8. Risk Assessment

Worldwide will regularly assess and prioritize anti-corruption risks. This includes evaluating its operating locations, service markets, use of Representatives, and interactions with public officials.

9. Policy Review

To maintain the ongoing relevance and precision of this policy, the Policy Owner will conduct an annual review.

Revision History table

Revision History			
Version	Date	Revision description/ Summary of Changes	Policy Owner
1.0	09/05/2025	Replacing and combining the previous version of “Global Anti-Corruption Policy” and “Global Anti-Corruption Policy Compliance Procedures” both dated 20Jul2017 and including it in the new Policy format	Gabrielle Lewis Legal Department

Signatures:

Policy Owner

Gabrielle Lewis Electronically signed by: Gabrielle Lewis
Reason: I approve this document
Date: 05-Sep-2025 11:14:37 EDT

Gabrielle Lewis Date: 09/05/2025

General Counsel

ANTIBRIBERY ANTICORRUPTION POLICY

Final Audit Report 2025-09-05

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