



Leading Edge
Pharms™

Supplier Code of Conduct

January 2019

Introduction

Leading Edge Pharms™ expects that suppliers, vendors, contractors, consultants and other third parties acting on its behalf (collectively, “Suppliers”) conduct business in compliance with all applicable laws and regulations and in accordance with the principles set forth herein.



Thank You

for your partnership with Leading Edge Pharms
And your commitment to upholding the
standards set forth in this code.

Workplace Standards & Practices

Suppliers are to operate their facilities and conduct employee relations in an ethical manner and honor the principles of internationally recognized human rights. Suppliers are to comply with applicable laws and regulations in the countries in which they operate or do business. This includes, but is not limited to, laws and regulations relating to human clinical trial research, labor, compensation, overtime, benefits, work hours, health and safety, and the environment.



Anti-Discrimination and Fair Treatment

Suppliers are to provide a workplace free from harassment and unlawful discrimination and provide fair and equal treatment in the areas of recruitment, hiring, training, promotion, compensation, discipline, discharge, and all other terms and conditions of work. Suppliers are to treat every worker with respect and dignity and not subject any worker to harassment, intimidation, bullying, or any physical, sexual, psychological, or verbal abuse.



Freedom of Association

Suppliers are to respect the rights of workers, as set forth in local laws, to associate freely, join or not join labor unions, seek representation, join workers' councils or engage in collective bargaining. Workers shall be able to communicate openly with management regarding working conditions without threat of reprisal, intimidation or harassment.



Wages, Benefits and Working Hours

Suppliers are to pay employees according to applicable wage laws, including minimum wages, overtime hours and mandated benefits. Suppliers are to pay workers in a timely manner and clearly communicate the basis on which workers are paid. Working hours for employees will not exceed the maximum set by applicable law or regulation.



Gifts and Entertainment

Suppliers shall respect the Syneos Health communicated policies regarding gifts and entertainment and conflicts of interest when dealing with Company employees and representatives.

Workplace Standards & Practices *(continued)*



Prevention of Forced Labor, Slavery and Human Trafficking

Suppliers are not to use any form of forced or compulsory labor, whether in the form of involuntary prison labor, indentured labor, bonded labor, or otherwise. Suppliers are to comply with all applicable anti-slavery and human trafficking laws.

Examples of activities that could support or advance forced and/or coerced labor and human trafficking:

- Bonding workers through debt;
- Destroying, concealing, confiscating or otherwise denying employees access to their identity or immigration documents, such as passports and drivers' licenses;
- Using misleading or fraudulent recruitment practices during the recruitment of candidates or offering of employment;
- Using recruiters that do not comply with local labor laws of the country in which the recruiting takes place;
- Charging applicants or candidates recruitment fees;
- Providing or arranging mandatory housing that fails to meet safety standards of the host country;
- If required by law or contract, failing to provide a written employment contract, recruitment agreement, or other required work document in writing and in the employee's native language and, if the employee is required to relocate for work, providing such documentation prior to the employee's departure from his/her home country; and
- Failing to provide or pay the cost of return transportation at the end of employment for an employee brought into a country for work where the employee is not a national of such country where the work is taking place; however, this does not apply to an employee who is legally permitted to remain in the country of employment and chooses to do so.



Prevention of Child Labor

Suppliers are not to use child labor. The minimum age for employment is 15 years of age (or 14 in accordance with developing country exceptions under International Labor Convention No. 138). If the employment concerns hazardous work, a "child" shall be defined as younger than 18 years of age. If national or local law or regulation provides for a minimum employment age greater than 15 years, or imposes additional restrictions in activities, such laws and regulations will apply.



Health Safety & Environment



Health and Safety Practices

Suppliers are to provide a safe workplace in compliance with applicable health and safety laws and establish policies and practices to minimize the risk of accidents, injury, and exposure to health risks. Suppliers shall identify and assess emergency situations within the workplace and any company-provided living quarters, and minimize their impact by implementing emergency plans and response procedures. Safety Information relating to hazardous materials—including pharmaceutical compounds and pharmaceutical intermediate materials—shall be available to educate, train and protect workers from hazards.



Environmental Practices

Suppliers are to conduct business in compliance with applicable environmental laws and shall operate in an environmentally responsible and efficient manner. In addition, they shall minimize adverse impacts on the environment. Suppliers are encouraged to conserve natural resources, to avoid the use of hazardous materials where possible and to engage in activities that reuse and recycle. Suppliers shall comply with all applicable environmental regulations. All required environmental permits, licenses, information registrations and restrictions shall be obtained and their operational and reporting requirements followed.

Business Integrity



Anti-Bribery/Anti-Corruption

Suppliers are to comply with all applicable anti-corruption laws and/or regulations. Corruption, extortion, bribery, and facilitative payments in any form are strictly prohibited. Fair market value in exchange for bonafide services is the standard for payments associated with the conduct of clinical trials.



Conflicts of Interest

Suppliers are to avoid conflicts of interest between their obligations to Syneos Health and their obligations to their other business partners.



Accuracy of Business Records

Suppliers are to keep accurate records of their business and financial activities. Financial books and records must be maintained in accordance with applicable laws, regulations and generally accepted accounting principles.



Protection and Use of Confidential and Personal Information

Suppliers are to comply with applicable laws and contractual requirements regarding the collection, processing, transfer, disclosure, storage, protection and use of any confidential information of Syneos Health or its customers, as well as any personal or clinical information about any individual. Suppliers are to utilize adequate physical and technical security measures, recovery capabilities and electronic access controls to adequately protect such information. Supplier is to notify Syneos Health immediately if it becomes aware of any unauthorized or unlawful processing, loss of, damage to or destruction of such information.



Securities Laws and Insider Trading

Suppliers are to comply with all applicable securities laws and regulations including, but not limited to, rules prohibiting the purchase, sale or transfer of stock or other securities of any company based on material nonpublic information. Information should be regarded as material if there is a reasonable likelihood that it would be considered important to an investor in making an investment decision. Nonpublic information is information that has not been previously disclosed to the general public and is otherwise not available to the general public.



Fair Competition and Antitrust

Suppliers are to comply with all applicable laws and regulations regarding fair competition and antitrust. Suppliers are to uphold fair business practices in sales and advertising.



Trade Controls

Suppliers are to comply with all applicable laws and regulations regarding importing, exporting, licensing requirements, sanctions, embargoes, boycotts and other trade restrictions.

Business Integrity



Reporting Mechanisms

Suppliers are to create mechanisms to enable workers to report workplace concerns and potentially illegal or unethical behavior and to protect workers who make good faith reports from retaliation. Suppliers are to investigate such reports and take appropriate corrective action, if needed and as appropriate.



Management Systems

Suppliers are to establish an appropriate management system to:

- Comply with applicable laws and regulations;
- Comply with the principles set forth in this Supplier Code of Conduct;
- Maintain adequate documentation to demonstrate compliance with applicable laws and regulations and the principles set forth in this Supplier Code of Conduct;
- Detect and correct any non-compliance;
- Train workers to understand applicable laws and regulations and the principles set forth in this Supplier Code of Conduct, and
- Communicate the principles set forth in this Supplier Code of Conduct to their supply chains.



Supply Chain

Suppliers are expected to require their third party providers to comply with the principles set forth in this Supplier Code of Conduct.

Suppliers can report any suspected compliance or ethics concerns regarding Leading Edge Pharms via the Leading Edge Pharms Business Ethics Helpline at (800) 813-0013.