

# **Global Code of Conduct**

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# Introduction

The Prescient Healthcare Group Global Code of Conduct (“Global Code”) outlines fundamental ethical principles and defines responsibilities, expectations and resources for all employees, agents, vendors and other representatives acting on Prescient’s behalf.

By complying with this Global Code, we demonstrate our commitment to protecting:

- Our employees
- Our clients
- Our suppliers
- Our communities

We hold ourselves to the highest standards of integrity and behavior and, consequently, our policies often go well beyond what is required by law.

Prescient’s Global Code is supported by the full set of company policies. Failure to comply with our Global Code or our policies may result in disciplinary action including termination of employment or contract.



## Our Prescient Values

We believe that respect and trust have to be continuously earned. We strive to achieve this by collectively challenging and supporting each other to be the best we can and by individually taking ownership, being accountable and making a difference. Our core values lie at the heart of how we operate and interact with our key stakeholders. By living our values at Prescient, we create a strong culture for success.

### Going beyond

The drive to go deeper, challenge harder and push further belongs to us as individuals and as a collective. We're driven to look for every opportunity to innovate: finding new and better ways to work, to learn and to collaborate. We aim to continually raise the bar, push what's possible and exceed expectations in our industry. It's never settling for where we are and what we've already achieved. That's the power of prescience.

### Being collaborative

Science and strategy may underpin our business, but what drives it are deep, collaborative relationships – being a true partner. First and foremost, we listen and understand, going deeper to connect on a human level. We value the energy that comes with working as part of a team. We build partnerships, not just projects, and we recognize our success as a collective. We know diversity and celebrating our differences are part of what makes us special.

### Being adaptable

We achieve results that go beyond by taking ownership of the outcome. We challenge, we take the initiative and we innovate. Our willingness to think differently is key to our flexibility. We respond to our clients' needs without ever losing focus of our key responsibility: to find the best solution.

### Being considered

At the heart of everything we do is the fundamental desire to have a positive impact. This motivation comes to life in how we keep the bigger picture in mind even as we balance day-to-day demands. We always start from a place of understanding, thoughtfully proposing the actions that move us towards achieving the best outcome.



## Our Commitments to Our People

Our vision is to be the pharmaceutical consultancy most respected for its people, expertise and impact. We cannot achieve this without holding ourselves to the highest ethical and moral standards, treating everyone with respect and dignity, and providing a workplace that is free from discrimination, harassment and unsafe conditions.

### Recruitment

We aim to recruit the person who is best suited to a particular job. Recruitment is conducted solely on the basis of an applicant's abilities and individual merit as measured against the criteria for the job. Qualifications, experience and skills will be assessed accordingly.

The company is committed to applying its equal opportunity policy at all stages of recruitment and selection. Short-listing, interviewing and selection will always be carried out without regard to gender, gender expression, sexual orientation, marital or civil partnership status, color, race, age, nationality, ethnic or national origin, religion or belief, disability, pregnancy, maternity or trade union membership. Employees conducting recruitment interviews will ensure that the questions they ask job applicants are not in any way discriminatory or unnecessarily intrusive. The interview will focus on the needs of the job and the skills needed to perform it effectively.

Candidates with a disability will not be excluded from consideration unless it is determined that the candidate would be unable to perform a duty (with reasonable accommodations) that is intrinsic to the role. Reasonable adjustments to the recruitment process will be made to ensure that no applicant is disadvantaged because of his or her disability.

### Equal Opportunity and Equal Pay

Prescient is committed to promoting equality of opportunity in all aspects of employment, including recruitment, training and career development to make full use of our employees' talents and to provide the same level of opportunity for everyone.

Each employee has a moral and legal duty not to discriminate against other employees, job applicants, suppliers, clients or any other business contacts. The conduct of any employee outside of work that could have a bearing on his or her employment or could harm the company's name or reputation will be addressed under the company's disciplinary procedures.

We are committed to the principle of equal pay for men and women. In this context, "pay" includes not only remuneration but also other benefits of employment such as promotion and training opportunities and access to facilities provided within the employment package. We are committed to introducing and maintaining pay systems that are transparent, based on objective criteria and free from gender bias. Women and men employed by Prescient are entitled to equal pay if they are undertaking work that is substantially similar or is of equal value to the organization unless there are specific and clear reasons unconnected with their gender that explain and justify any difference in pay. In some cases, individuals carrying out similar work may receive different salaries based on seniority, qualifications or other such factors.

## Diversity

Prescient is fully committed to the elimination of unlawful and unfair discrimination and values the differences that a diverse workforce brings to the organization. The company does not discriminate because of age, disability, gender expression, marriage or civil partnership status, pregnancy or maternity, race (which includes color, nationality and ethnic or national origin), religion or belief, sex or sexual orientation. It does not discriminate because of any other irrelevant factor. Instead, Prescient cultivates a culture that values meritocracy, openness, fairness and transparency.

All employees are responsible for the promotion of our Diversity Policy. Behavior, actions or words that transgress the policy will not be tolerated and will be dealt with in line with the company's Disciplinary Policy. Our approach to diversity is applicable to all employees, clients, communities, suppliers and contractors, whether permanent or temporary, and applies to all processes relating to employment and training and to any dealings with customers and clients. Decisions relating to customers will be based on business-related criteria only; irrelevant information will not form part of any such process.

## Data Protection

Prescient is committed to compliance with international data protection laws. Our Data Protection Policy applies to Prescient entities worldwide and is based on globally accepted principles on data protection. Ensuring data protection is the foundation of trustworthy business relationships and the reputation of Prescient as an attractive employer.

We take reasonable steps to ensure that personal data are accurate, adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.

To ensure that personal data are kept for no longer than necessary, Prescient has a data retention policy that is reviewed at least annually. This policy sets forth what data should or must be retained and for how long.

Prescient ensures that personal data are stored securely by adopting state-of-the-art security measures and using modern, regularly updated software. Access to personal data is limited to personnel who need it to perform their duties. When personal data are no longer needed or when the retention period expires, personal data are destroyed such that the data are irrecoverable.

## Health and Safety

We recognize that we have a legal duty of care to protect the health and safety of our employees and others who may be affected by the company's activities. In order to discharge our responsibilities, we have a Health and Safety Policy to provide adequate control of the health and safety risks arising for our work activities. We consult with our employees on matters affecting their health and safety and provide and maintain safe plant and equipment. We also provide information, instruction, supervision and adequate training for employees. We seek to ensure that all employees are competent to perform their tasks.

To prevent accidents and cases of work-related injury or disease, we maintain safe and healthy working conditions and ensure that any organization that is contracted to carry out work for us is able to demonstrate that it operates safely. It is the responsibility of all employees to cooperate in the implementation of Health and Safety Policy requirements within their areas of influence. All employees have a legal duty to ensure their own safety and the safety of others (including colleagues, visitors and contractors).



## Our Commitments to Our Clients

Prescient could not operate without the trust of our clients. We must therefore always act with our clients' best interests in mind.

### Confidentiality

Clients often trust us with their sensitive, proprietary or confidential information. All confidentiality and privacy obligations assumed by Prescient are assumed by Prescient's employees and passed on to relevant sub-contractors. Consequently, no Prescient representative may share information either received from or collected on behalf of a client with anyone not directly involved in the client engagement without the client's permission.

- Not disclose information indicated to be confidential by a third party without the third party's consent
- Not report non-public pricing information to clients
- Not infringe the copyright of third parties
- Not collect or pass on to clients anything that could be defined as the trade secret of a third party

### Securities Trading

Not only are our employees prohibited from disclosing client information to anyone who should not have it, they are also prohibited from using it to their own personal advantage. Prescient employees are prohibited from using the information to which they have access through their relationship with Prescient to make decisions about buying or selling stocks.

### Competing Activities

Prescient partners with a large number of pharmaceutical and biotech organizations and retains the right to support multiple clients within a given indication, mechanism of action, technology or geography. To do so without compromising the intellectual property of our clients, we must:

- Treat all scientific, technical, commercial and other information either received from clients or otherwise obtained in connection with our engagement as confidential, unless such information is exempt from the definition of "confidential"
- Not assign employees to projects for multiple clients in the same indication and mechanism of action
- Respect the enduring obligations that new and prospective employees may have toward a prior employer

### Third-Party Information

To protect our clients from third-party claims or allegations of anti-competitive behavior, we must avoid sharing information that could expose our clients to litigation or, worse yet, legal prosecution. Prescient employees will therefore:

- Require employees to acknowledge their obligations to their clients in writing
- Maintain strict technical firewalls to centrally control access to all client materials

Additional information about Prescient's approach to preventing conflicts of interest is available in our Competing Activities Policy.

## Transfers of Value

In a business setting, any payment or gift has the potential to be interpreted as an attempt to unfairly influence the recipient. As a result:

- For clients: Many organizations prohibit their employees from accepting gifts from suppliers. To prevent putting our clients in an uncomfortable position, Prescient representatives shall not offer gifts of more than nominal value to existing or prospective clients
- For respondents: Under transparency laws, transfers of value made to healthcare professionals and organizations must be reported to various regulatory bodies. Prescient shall not offer honoraria or other forms of payment to research respondents without the express written permission of the client
- For government officials: Prescient complies with all laws governing payments made to government employees, including the UK Bribery Act and the US Foreign Corrupt Practices Act

## Research Activities

Primary research is a component of many of Prescient's client engagements. When conducting primary research, Prescient representatives are forbidden from:

- Disclosing the identity of the client without the client's permission
- Misrepresenting their identity or the identity of Prescient

Our Compliance Team delivers regular training on our industry-leading Code of Ethics, which outlines extensive requirements related to conducting research on behalf of Prescient. Any potential breaches are investigated in accordance with our Compliance and Risk Management Policy.

## Sub-contractors

It is essential that our suppliers safeguard the integrity and security of their systems and comply with relevant government standards and guidance. Our suppliers are also expected to comply with legal requirements and the provisions of our client contracts to protect clients' commercial, sensitive and personal data.





## Our Commitment to Our Suppliers and Sub-Contractors

Prescient partners with suppliers and sub-contractors to ensure our supply chain meets the same high standards that we set for ourselves. Suppliers and sub-contractors are required to comply with all applicable laws and regulations when working on our behalf, as well as the Prescient Supplier Code of Conduct. In return, Prescient treats our suppliers and sub-contractors with the respect and care they deserve for long-lasting, honest business relationships.

### Ethics

Prescient is committed to conducting business with the highest levels of integrity. Our collaborative association with suppliers and sub-contractors is based on mutual trust, fairness and pride in completing a job well done. We are honest and open when we interact with suppliers and sub-contractors. We support competitive business practices and make decisions objectively and without regard to personal or financial gain or personal relationships. We expect our suppliers and sub-contractors to conduct business in the same manner.

### Legal Obligations

Prescient executes formal agreements with our suppliers and sub-contractors to ensure they act within the letter and the spirit of the law. These contractual obligations cover the areas of anti-bribery and anti-corruption laws, employment law, confidentiality, information security and data protection. We provide training on complex legal areas such as data protection and address queries promptly. In addition, we provide copies of relevant internal policies to our suppliers upon request, should doing so aid their legal compliance. Prescient constantly works to enhance our supplier due diligence through communication on regulatory and legal practices and web-based assessments.

In return, Prescient respects and exercises due care and diligence for our suppliers' and sub-contractors' confidential information and personal data and understands the importance of keeping these data secure. We hold training sessions on these important areas so that our suppliers and sub-contractors can feel confident in providing information to any area of the business with which they work.

### Pay

We are fair and reasonable in our payment practices and make payments on time and in accordance with any contractual obligations. Our finance department takes into account the specific situation of suppliers and sub-contractors when determining payment terms to ensure practices are fair.



## Our Commitment to Our Communities

Our goal is to act as a responsible corporate citizen and ensure our employees and suppliers are following high standards of ethical conduct around the world so that our communities are enriched by our presence and our operations.

### Environment

We ensure that significant risks to the environment associated with office-based activities are assessed and minimized and we attempt to minimize our overall impact on the environment. We commit to identifying operations that use significant amounts of energy and other resources such as paper with a view to reducing consumption. We review the thermal insulation of our offices to minimize energy use in heating and lighting and review staff traveling arrangements to encourage car-sharing, use of public transportation, cycling and working from home where practicable.

### Modern Slavery

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labor and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit him or her for personal or commercial gain. We have a zero-tolerance approach to modern slavery. We are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or our supply chain.

We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chain.

We expect the same high standards from all of our contractors, suppliers and other business partners. As part of our vendor selection processes, we consider the risk of forced, compulsory or trafficked labor, and we expect that our suppliers will hold their own suppliers to the same high standards.

### Corporate Social Responsibility

By encouraging volunteer activities and charitable donations, we help forge stronger communities. We encourage our teams to select charitable organizations in each of our geographies to raise funds for worthwhile causes. We also offer pro bono consultancy to select clients to support their philanthropic efforts.

### Engagement

When Prescient and its employees interact with members of the community, we must always do so with our values in mind. In any type of public forum, we must represent ourselves appropriately at all times. We must also refrain from making disparaging comments or unsubstantiated claims, as doing so could harm both the subject of the comment and the reputation of Prescient. Employees are prohibited from speaking on behalf of the company without its permission. Prescient does not restrict its employees' personal lives in any way, but encourages employees to be aware that their conduct outside of work may ultimately reflect on Prescient.

## Getting Help on the Code of Conduct

We encourage our employees to seek advice from their line manager, human resources department or compliance team when they are unsure about an appropriate legal or ethical course of action. This would include situations when:

- Applicable policies seem difficult to interpret
- Relevant laws or regulations are complex
- An employee has limited experience dealing with the subject matter
- Differences of opinion make the course of action unclear
- Potential actions or decisions make the employee uncomfortable

We expect employees to report potential or suspected violations of Prescient policy or applicable laws, regulations or professional standards in accordance with Prescient's Whistleblowing/Speak-up Policy. This expectation extends to situations when employees know or suspect that company leaders, employees, clients or parties associated with clients, suppliers, sub-contractors or other third parties associated with the organization are engaged—or may be about to engage—in illegal or unethical activity.

If employees prefer to raise a concern anonymously, they may do so through our external reporting platform at <https://integritycounts.ca/org/prescienthg>.

**For more information,  
contact Prescient today**

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