

Code of Conduct



TABLE OF CONTENTS



02	Table of contents
03	Message from CEO
04	Our Core Values
05	About the Code
08	Ethics
11	Labor and Human Rights
13	Reputation and Assets
16	Ethics in Healthcare
18	Health and Safety
19	Sustainability

MESSAGE FROM CEO



Dave W. Miller
CEO of Genesis Research Group

Dear Colleagues,

I am pleased to introduce the updated Code of Conduct for Genesis Research Group. Ethics and compliance are an integral part of our culture and are fundamental to our reputation, strategy, and long-term success.

Each one of us must conduct ourselves and our business with honesty, fairness, integrity, and accountability. This Code is a tool that has been designed to help guide us in our daily decision-making. It is all of our responsibility to understand and follow this Code. Genesis Research Group's reputation is in the hands of every one of us.

There is nothing more important to Genesis Research Group than making sure we do what is right. Sometimes the right thing is not always obvious, particularly in the complex environment in which we operate. So, please remember when you need to make a tough choice, consult the Code. If you need to discuss this further, seek guidance from managers or other internal resources referred to in this Code.

Thank you for your careful attention to our Code. Your adherence to its principles is fundamental to our long-term success.

Best Regards,
Dave

OUR CORE VALUES



One Team

We support and improve each other. We give each other the benefit of the doubt and assume positive intent. We go above and beyond for each other.



Focused Passion

We play to win. We are curious yet disciplined in our endeavors. We are proactive, confident, and having fun in everything we do.



Accelerated Excellence

We get stuff done and operate with a sense of urgency. We execute with agility, quality, and excellence. We innovate. We find a better way.



Growth-Minded

We seek to grow personally, professionally, and together as an organization to best serve our clients. We seize opportunities. We are comfortable being uncomfortable as we learn.

ABOUT THE CODE

Genesis Research Group is proud of the values with which it conducts business. It has and will continue to uphold the highest levels of business ethics and personal integrity in all types of transactions and interactions. To this end, this Code of Conduct (the “Code”) serves to (1) emphasize Genesis Research Group’s commitment to ethics and compliance with the law; (2) set forth basic standards of ethical and legal behavior; (3) provide reporting mechanisms for known or suspected ethical or legal violations; and (4) help prevent and detect wrongdoing. This Code applies to all Genesis Research Group directors, officers, employees, contractors, and those working on behalf of Genesis Research Group (collectively, “Associates”).

Compliance is everyone’s responsibility. We must comply with all applicable laws and regulations and Genesis Research Group policies. A violation of the Code can cause harm to Genesis Research Group in terms of its business reputation and the potential loss of confidence by our customers, investors, and Associates.

In light of the above, we must take the time to learn and understand this Code, Genesis Research Group’s policies and the laws and regulations applicable to our job responsibilities. We require all Associates to acknowledge their commitment to comply with this Code and all Genesis Research Group policies. We may also be required to attend training sessions to ensure we understand such policies, laws, and regulations.

Given the variety and complexity of ethical questions that may arise in Genesis Research Group’s course of business, this Code cannot address every possible situation, but outlines Genesis Research Group’s expectations for behavior in important areas. Confronted with ethically ambiguous situations, Associates should remember Genesis Research Group’s commitment to the highest ethical standards and seek advice from managers or other appropriate personnel to ensure that all actions they take on behalf of Genesis Research Group honor this commitment.

Our Compliance Resources include:

- Your manager, or a more senior manager
- Human Resources
- General Counsel
- Through the compliance email, compliance@genesisrg.com
- Or through the Anonymous Reporting feature in Namely

(toggle to Anonymous Reporting on the left side of your Home screen in Namely <https://genesisrg.namely.com/>)

Raising Concerns and Prohibition Against Retaliation

We foster a culture of openness and accountability, where everyone feels secure in seeking advice and raising concerns about actual or suspected misconduct or unethical practices. Each of us has a responsibility and an obligation to promptly report suspected or known violations of the Code, violations of the law or dangers at work. For example, this may include criminal activity, bribery, financial fraud, negligence or danger to health and safety. Ethical and compliance concerns should be communicated through the reporting channels mentioned above. If Associates have any queries, they should contact the General Counsel.

Raising concerns or reporting misconduct, especially if it involves a friend or manager, may feel like a breach of trust. However, being silent and not reporting the concern could bring serious harm to Genesis Research Group, loss of confidence by customers, fines or other kinds of penalties. We encourage and enable everyone to speak-up and report actual or suspected misconduct as soon as possible, in the knowledge that concerns will be taken seriously, investigated as appropriate, and that Genesis Research Group will protect anyone making a report in good faith from retaliation or reprisals, even if they turn out to be mistaken. Genesis Research Group hopes that Associates feel able to voice concerns openly. Genesis Research Group will make every effort to maintain confidentiality for those who wish to raise issues confidentially, subject to local laws or regulations. As a reminder, we offer anonymous reporting through Namely, which is available 24 hours a day, 7 days a week. Reports can be made confidentially and anonymously where local law permits and without fear of reprisal. Your comments will be heard.

We strictly prohibit retaliation against anyone who makes a good faith report about a known or suspected violation of our Code, our policies, or any law or regulation. You will not be fired, demoted, or reprimanded for making a report. We expect managers to take all Associates' concerns seriously and create an environment where Associates feel comfortable raising concerns.

Investigations and Cooperation

We will investigate all reports of potential violations of the Code, policy, or the law. If asked, all Associates must cooperate with any investigation by providing full, complete, and truthful information in a timely manner.

Violations of our Code

We are committed to compliance with our Code. Anyone who violates them in spirit, intent, or letter may be subject to disciplinary action and corrective action, up to and including termination of employment. In addition, failure to report improper behavior, knowingly making a false report or refusing to cooperate with an investigation may also be grounds for disciplinary action.

ETHICS



Conflicts of Interest

A conflict of interest exists when a person's private interest interferes in any way with the interests of Genesis Research Group. A conflict can arise when an Associate takes actions or has interests that may make it difficult to perform his or her work for Genesis Research Group objectively and effectively. Conflicts of interest may also arise when an Associate, or members of his or her family, friends, liaisons, and intimate partners, receives improper personal benefits because of his or her position. Loans to, or guarantees of obligations of, Associates and their family members, friends, liaisons, and intimate partners, may create conflicts of interest. It is almost always a conflict of interest for an Associate to work simultaneously for a competitor, customer, or supplier.

Conflicts of interest may not always be clear-cut, so if you have a question, you should consult with a Compliance Resource listed on page 5. Any Associate who becomes aware of a conflict or potential conflict should report it.

The following are examples of conflicts of interest:

- Engaging in any employment, business, professional or other activity outside of Genesis Research Group that interferes or conflicts with your job responsibilities.
- Holding a substantial direct or indirect financial interest in a current or prospective customer, supplier, or competitor of Genesis Research Group, or serving as an employee, consultant, officer, or director of that business.
- Directing Genesis Research Group business to a supplier owned or managed by you, a relative or close associate.
- Using confidential information, taking advantage of Genesis Research Group business opportunities, or improperly using Genesis Research Group assets for the benefit of yourself, a relative or close associate.

Participation in non-business activities such as charity work or the carrying out of political roles may create a conflict of interest if your personal involvement creates obligations for Genesis Research Group without Genesis Research Group approval or if your activity makes it appear that Genesis Research Group has undue influence on decisions.

This is not a complete list of possible conflicts of interest but a sample of the kinds of relationships and activities that can create a conflict of interest.

ETHICS



Global Business Conduct

We are committed to abiding by the laws and regulations that govern our business conduct worldwide. We have a zero-tolerance policy for bribery and corruption. We respect and comply with all applicable anti-bribery and anti-corruption laws where we operate, including, but not limited to, the US Foreign Corrupt Practices Act, the UK Bribery Act 2010 and the US Federal Anti-Kickback Statute, which makes it unlawful to conduct business through unlawful payments, bribes, kickbacks, gifts or other questionable inducements.

Genesis Research Group Associates are strictly prohibited from offering, giving or facilitating in the form of bribe or kickback. A “bribe” or “kickback” is any money, fee, commission, credit, gift, gratuity, thing of value or compensation of any kind that is provided, directly or indirectly, and has as one of its purposes the improper obtaining or rewarding of favorable treatment in a business transaction.

Business courtesies such as nominal gifts and modest meals may only be offered or provided if appropriate under local standards and consistent with applicable laws and regulations and Genesis Research Group policies. No business courtesy may, under any circumstances, be offered where a reasonable person might conclude that the courtesy was offered with an expectation or obligation of favorable treatment in a business transaction.

Special requirements apply when interacting with a government official, which is broadly defined and includes any employee of a government agency or department, any employee of an enterprise that is government-owned, operated or controlled, political party representative or official or candidate for political office. Paying, offering, or promising to pay bribes or kickbacks to government officials to secure business, even if it is for our customer's business, is strictly prohibited.

Gifts

We recognize that under certain circumstances, gifts and entertainment can create goodwill and build business relationships, but we are sensitive to the fact that they can also create the perception of a conflict of interest and, in some instances, violate the law. We do not engage in any activity that could raise concerns about our integrity.

Associates are prohibited from offering or accepting gifts, or entertainment of more than modest value (\$100) to or from anyone who conducts or seeks to conduct business with Genesis Research Group.

ETHICS



Gifts *continued*

There are significant legal restrictions that apply to offers of gifts or entertainment to Healthcare Professionals (“HCPs”) and to government officials. Do not offer anything of value to individuals (or their related institutions) in these roles without obtaining approval in advance from the Genesis Research Group’s General Counsel. Be aware that it is never appropriate to solicit a gift or entertainment.

Export Control and Trade Sanctions

We respect the rights of governments to regulate the flow of goods, information and services across national borders. We comply with applicable import and export and customs requirements. Keep in mind, an export can be something other than a physical product, such as, emailing information or technology across national borders; traveling outside of the country with a laptop that contain technical data; sharing information with someone who is not a citizen or permanent resident of your country. We will not engage in any dealings with a country or individual subject to an embargo or trade sanctions. We will not engage the services of anyone who is on a relevant governmental Restricted Parties or Persons list.

Fair Competition

Antitrust and competition laws promote fair competition and ensure our business competes based on quality, price, and service. We compete vigorously, fairly, independently, and in compliance with the antitrust and competition laws of those countries in which we do business. Associates should only collect competitive information lawfully, such as gathering from public sources. Remember that violations of competition laws can lead to severe civil penalties, damages, fines, and possible jail time for individuals involved.

Compliance with Laws, Rules, and Regulations

Obedying the law, both in letter and in spirit, is the foundation on which Genesis Research Group’s ethical standards are built. In conducting business, Associates shall comply with Genesis Research Group policies, applicable governmental laws, rules, and regulations at all levels of government in the United States and in any non-U.S. jurisdiction in which we do business. Although not all Associates are expected to know the details of these laws, it is important to know enough about the applicable local, state, and national laws to determine when to seek advice as necessary.

LABOR & HUMAN RIGHTS



Diversity and Inclusion

We are proud of our diverse workforce. Each of us has unique experiences and perspectives that together drive the creativity and ingenuity that marks Genesis Research Group's success. We are all responsible for fostering a work environment where everyone is treated with fairness, dignity, and respect. We ensure the equal opportunity and treatment of all Associates in recruitment, employment, development, and career advancement, by providing equal opportunities based on fair, transparent and objective criteria and without regard to race, color, gender, ethnicity, religion, national origin, sexual orientation, age, disability or medical condition or any other legally protected status or characteristic.

Harassment

We provide a workplace free of harsh and inhumane treatment, discrimination and harassment, sexual abuse, corporal punishment, mental or physical coercion or verbal abuse. We strictly prohibit any form of bullying or harassment in the work environment. Harassment includes any form of behavior with the purpose or effect of violating the dignity of a person and of creating an intimidating, hostile, degrading, humiliating or offensive work environment. We are all accountable to create a culture that embraces the contributions of all Associates.

Child labor

We will not use or support child labor. Associates will be above a country's legal age of employment.

Anti-Discrimination

We will provide a workplace that is free from harassment and discrimination. Discrimination for reasons such as race, color, gender, ethnicity, religion, national origin, sexual orientation, age, disability or medical condition, or any other characteristic protected by law is prohibited.

Freely Chosen

We will not use forced, bonded, enslaved, indentured, or involuntarily imprisoned labor, nor engage in human trafficking. Associates have the right to enter employment voluntarily and freely. Associates have the right to freely terminate employment at any time without the threat of penalty, by means of reasonable notice.

LABOR & HUMAN RIGHTS



Freedom of Expression and Association

We respect the right for Associates to communicate, raise concerns about working conditions, and to establish and join trade unions of their own choice, in compliance with applicable laws and regulations freely and voluntarily.

Living Wage

We comply with local minimum wage laws. We use market and industry standards to offer living wages where no wage law is in existence.

REPUTATION & ASSETS



Confidential Information

Confidential Information (as defined below) is very important to Genesis Research Group and the loss, theft, unauthorized use or disclosure or misuse of Genesis Research Group's Confidential Information jeopardizes its business and causes harm. Associates possessing Confidential Information shall not at any time either during or after the termination of their employment disclose to any person or use for their own purposes any Confidential Information, other than as required by local laws or regulations. "Confidential Information" means information relating to the business, products, affairs and finances of Genesis Research Group, or its customers, suppliers or partners, and trade secrets including, without limitation, technical data and know-how relating to the business of Genesis Research Group or any of its customers, suppliers, or partners.

Privacy and Data Protection

Genesis Research Group will, during its activities, collect, store and process personal data about its Associates, customers, suppliers and other third parties. Some of this data will be "sensitive" personal data (for example, information about an Associate's health or ethnicity). We are committed to individual privacy and recognize the responsibility it must protect the privacy rights of all persons whose personal information is within our custody and management. We will not intentionally gather or maintain personal information that is not relevant to conducting its business.

Each of us must take care to protect individually identifiable and personal information from inappropriate or unauthorized use or disclosure. In addition, Genesis Research Group will ensure that personal data held is accurate and kept up to date.

Insider Trading

We will comply with applicable laws and regulations related to insider trading and the sale and purchase of securities. Associates who have access to material, non-public information, including that of our customers, suppliers, and partners, are not permitted to use or share that information for stock trading purposes, sharing information with family members or friends, or for any other purpose except to conduct regular Genesis Research Group business. All nonpublic information about Genesis Research Group, and our customers, suppliers, and partners, should be considered confidential information. It is always illegal to trade in stocks or securities while in possession of material, non-public information. Some examples of material, non-public information include clinical trial data, corporate strategies, mergers and acquisitions, and changes in top management. It is also illegal to communicate or "tip" such information to others.

REPUTATION & ASSETS



Accuracy, Retention and Disposal of Documents and Records

Genesis Research Group's books and records shall be complete, fair and accurate and shall comply with all legal reporting requirements. Books and records may include timesheets, invoices, expense reports, research results, training records, clinical safety/pharmacovigilance records, to name a few. No entries will be made that intentionally conceal or disguise the true nature of any transaction. Genesis Research Group will not create or permit the creation of false or misleading statements in financial reports, clinical or research data or other documents submitted to or maintained for government agencies, customers or other entities.

We maintain rigorous business processes and a system of internal controls to protect its physical, financial, and intellectual property assets and to ensure that management decisions are based on sound financial and economic analysis, including consideration of the risks.

All records will be retained and destroyed strictly in accordance with Genesis Research Group's policies and applicable statutory and legal requirements. We are not allowed to remove or destroy records or documents prior to the specified date in the policy or remove or destroy them at all if the destruction policy is suspended due to threatened or pending litigation or investigation.

Intellectual Property

Genesis Research Group's intellectual property, including but not limited to its copyrights, patents, trademarks, and trade secrets are extremely valuable to Genesis Research Group and its continued success. The loss, theft, unauthorized disclosure, or misuse of our intellectual property jeopardizes our business and causes harm.

Each of us is responsible for preserving Genesis Research Group's intellectual property by complying with policies and procedures for its protection. This obligation continues even after a person leaves the employment of Genesis Research Group.

Genesis Research Group also respects the intellectual property of others. It is against the policy to reproduce copyrighted software, documentation, or other materials without the owner's permission. We respect the limitations specified in agreements and do not use or copy intellectual property except to the extent that the applicable agreement allows for such use or copying.

REPUTATION & ASSETS



Intellectual Property *continued*

All Associates agree to assign to Genesis Research Group all rights he/she/they may have or may acquire in any intellectual property including without limitation in any idea, invention information, concept or thing which is both (i) based upon or related to any Genesis Research Group confidential information, service(s) or product(s) and (ii) is generated during the term of their employment, except in those instances where local laws and regulations contain mandatory requirements that differ.

ETHICS IN HEALTHCARE



Payments or Transfers of Value to HCPs

We comply with all state and federal laws regarding tracking and reporting in connection with payments or transfers of value to HCPs. No interactions with HCPs should be intended to improperly influence an HCP. In the event we contract with an HCP, we should only be doing so to meet a legitimate and appropriate business purpose and with terms that are consistent with the law and our policies. We adhere to applicable guidelines and regulations related to offering meals and hospitality and will not provide any gifts or entertainment to any HCP. HCPs are medically qualified persons, such as physicians, dentists, pharmacists, nurses, coroners, or as otherwise specified by local regulations.

Adverse Events

We support the health and safety of patients, and we are committed to support our clients that manufacture and or market medicinal products with the reporting of adverse events ("AE") associated with a client's medicinal product. In the context of pharmacovigilance and outside a clinical trial, an AE is an untoward medical occurrence in a patient to whom a medicinal product is administered, and which does not necessarily have a causal relationship with treatment. An AE can therefore be any unfavorable and unintended sign (including an abnormal laboratory finding), symptom, or disease temporally associated with the use of a medicinal product.

If we become aware of solicited or unsolicited reports of AEs related to a client's medicinal products, we must report these to the client in a timely manner, and as detailed by Genesis Research Group policy and the applicable client agreements and procedures, to ensure that the client can comply with its applicable regulatory requirements.

Note, studies characterized by secondary use of data previously collected for other purposes, such as medical chart reviews, analysis of electronic healthcare records, systematic reviews, and meta-analyses, will typically not require the reporting of individual AEs; for these studies, AEs will be typically summarized in final study report.

ETHICS IN HEALTHCARE



Scientific and Research Integrity

All scientific and research work conducted on behalf of our customers shall be performed with the highest ethical standards and practices and fully compliant with all rules, laws, regulations and internationally recognized quality and safety standards applicable to the work being performed. Further, the financial aspects of the research conducted by us on behalf of a client that manufactures or markets medicinal products shall be documented in a written agreement.

To this end, we maintain a comprehensive Quality Management System, which fosters a culture of quality, provides assurance that our deliverables are scientifically sound and supports our compliance with applicable laws and regulations and internationally recognized standards.

Interaction with Government Officials

Never offer or make payments or gifts directly or indirectly to any governmental official or employee to secure an improper advantage. Make sure all representations, reports, data, and other statements that you submit on behalf of our customers to governmental officials are accurate and truthful.

HEALTH & SAFETY



Worker Protection

We maintain a safe working environment that protects the health and safety of our Associates and provide safety equipment and training as required. We are each responsible for maintaining a safe working environment, including timely reporting of all workplace accidents, disease or other conditions that may endanger others, including spills or the release of hazards. We also foster a workplace that is free of illicit drugs and alcohol. Finally, threatening, or violent behavior is never permitted.

Emergency Preparedness and Business Continuity

We believe that business continuity management is critical for our customers, associates, and other stakeholders, and is part of responsible management practice. In the event of an emergency or significant business disruption, we are committed to doing our utmost to ensure an uninterrupted supply of our products and services. In the event of an emergency, Genesis Research Group may need to contact you. Keep your phone number and email and emergency contact on file up to date so you or your emergency contact can be reached if necessary.

SUSTAINABILITY



We comply with all applicable environmental regulations. In addition, where appropriate, all required environmental permits, licenses, information registrations and restrictions shall be obtained, and operational and reporting requirements followed.

We protect the environment by preventing pollution and strive to conserve natural resources through innovative processes and continuous improvement methodologies with the goal of reducing, reusing, recycling, and identifying alternatives for our organization, which includes reducing water and energy consumption and greenhouse gas emissions. We will continue to focus our efforts to identify where conservation opportunities exist. All employees should strive to conserve resources and reduce waste and emissions through recycling and other energy conservation measures.

We work to reduce our carbon emissions over time which will reduce our impact on climate change.



LET'S WORK TOGETHER

compliance@genesisrg.com

Anonymous Reporting via Namely
<https://genesisrg.namely.com/>

(on the left side of your home screen)