



Labcorp Supplier Code of Conduct

Values and Standards for our Partners



Table of Contents

2	Overview
---	----------

Supplier Code of Conduct Elements

3	How Does the Code Work?
3	Expectations
4	Ethics and Compliance
5	Labor and Human Rights
5	Environment
6	Management Systems
7	Disclosure
7	Raising Concerns
7	References



Overview

Labcorp is committed to our mission of improving health and improving lives through sustainable business practices, including conducting business ethically, responsibly, with integrity, and in accordance with the law. At Labcorp, we know there's only so much that we can do by ourselves, which is why we rely on you, our suppliers, vendors, contractors, consultants and agents ("Supplier(s)"), to help us accomplish our goals. We expect Suppliers to honor the same commitment and adhere to this Supplier Code of Conduct (the "Code"). The Code highlights certain legal, ethical and business requirements that are of particular importance to Labcorp, but is not meant to cover all laws and standards that may apply to a Supplier's activities or its relationship with Labcorp.

How does the code work?



Teamwork

We provide excellent service and demonstrate a sense of urgency on any matter related to our customers because satisfied customers are essential for our success.



Integrity

We act with uncompromising ethical standards, both as individuals and as a Company.



Ownership

We require personal ownership and timely resolution of problems, regardless of whose job it is.



Inspiration

We recruit, develop, and retain top talent and believe people are our greatest assets.



Courage

We guard and conserve Company resources.



Excellence

We keep moving and embrace change as an opportunity to continuously improve the Company and ourselves.

Expectations

- Firmly adhere to these principles;
- Integrate, communicate and apply these principles;
- Operate in full compliance with all applicable laws, rules and regulations;
- Integrate these principles into a continual improvement approach that advances performance over the lifecycle of your relationship with Labcorp.

These principles are not intended to replace, supersede or conflict with any applicable legal or regulatory requirement or contractual obligation with Labcorp. Each Supplier must determine how to meet and demonstrate compliance with these principles and expectations in this Code.

Ethics and Compliance

Suppliers are expected to conduct business in accordance with the highest ethical standards and act with integrity. Ethical standards include, but are not necessarily limited to, the following:

- **Accuracy of Business Records:** Keeping financial books and records in accordance with applicable legal, regulatory and fiscal requirements, and following acceptable accounting practices.
- **Animal Welfare:** Where a Supplier's activities relate to animal care and use of animals, adopting an Animal Welfare Code of Respect similar to that adopted by Labcorp, which requires Suppliers to treat animals with respect and to strictly follow all applicable laws for animal treatment.
- **Anti-Bribery and Anti-Corruption:** Adhering to all applicable anti-corruption laws. Suppliers shall not engage in any form of corruption, embezzlement, extortion or bribery. [See Labcorp's Policy available here.](#)
- **Clinical Trials:** Where a Supplier participates in conducting clinical trials with or on behalf of Labcorp, complying with international guidelines, national and local laws and regulations, and established medical, scientific and ethical principles, including the Declaration of Helsinki.
- **Conflict of Interest:** Not taking action(s) that would impair, or be perceived to impair, the objectivity of your performance by putting personal gain or benefit ahead of the interests of Labcorp or our customers. If a Supplier or any of its employees have a relationship with a Labcorp employee that might present a conflict of interest, the affected party should immediately disclose it to Labcorp.
- **Fair Competition:** Applying fair business practices in compliance with all applicable anti-trust and competition laws.
- **Food, Drug and Device Testing:** Where a Supplier's activities include food, drug or medical device testing, complying with all applicable food, drug, cosmetic and medical device laws, which may include, without limitation, the United States Food, Drug, and Cosmetics Act, European Union Medical Device Regulations and the International Conference on Harmonization Guidelines.
- **Gifts, Meals and Entertainment:** Refraining from providing or offering anything of value to Labcorp employees that could be viewed as inappropriately influencing Labcorp's business decisions or gaining an unfair advantage.
- **Health Care Compliance:** Disclosing any sanction, exclusion or other event that would make the Supplier ineligible from participating in any government-funded program or contract.
- **Legal Compliance:** Complying with all applicable laws and regulations of the countries of its operations.
- **Protecting Information:** Complying with applicable laws and contractual requirements regarding the storage, transmission, protection, disclosure and use of confidential information. Such information may include, without limitation, personal data about any individuals and Labcorp's confidential information (non-public financial plans, business plans, standard operating procedures, new or improved products, services or processes, pricing and marketing strategies, customer lists; etc.), intellectual property rights (patents, trademarks, copyrights, trade secrets, etc.) and innovative ideas.
- **Responsible Sourcing:** Exercising responsible sourcing in the Supplier's supply chain, acting in reasonable and practical accordance with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, as applicable, and providing information as may be requested by Labcorp to enable Labcorp to accurately report, as required, on the source and chain of custody of conflict minerals. [See Labcorp's Conflict Minerals Statement available here.](#)
- **Risk Management:** When requested, Suppliers must complete the Labcorp Third Party Risk Management risk assessment or reassessment, as necessary, in a timely manner and participate in ongoing monitoring efforts.
- **Securities Regulations:** Acknowledging that the shares of Labcorp are publicly listed on the New York Stock Exchange, that the shares of its customers may be publicly listed, and that any information pertaining to Labcorp or its customers may potentially constitute material, non-public information within the meaning of applicable US securities and insider trading laws.
- **Trade Compliance:** Complying with all applicable import and export controls, sanctions and other trade compliance laws of applicable country(ies) where transaction(s) occur.
- **Electronic Systems:** Complying with all applicable laws, regulations and guidance relating to the use of electronics systems for clinical trials.



Supplier Tips

- You may not provide cash or cash-like equivalents (i.e., gift cards) under any circumstances to a Labcorp employee, family member/relative, etc.
- A Supplier should not employ a Labcorp employee or make payments directly to a Labcorp employee during the course of a transaction with Labcorp.

Labor and Human Rights

Suppliers are expected to uphold the human rights of their employees and treat them with respect and dignity ([find Labcorp's Combatting Modern Slavery Statement and associated policy, available here](#)). This includes:

- **Fair Treatment:** Providing a workplace that is free from all forms of unlawful discrimination and harassment against any employee because of race, color, national origin, ancestry, nationality, citizenship, religion, creed, age, sex (including pregnancy), marital or familial status, sexual orientation, gender identity and/or expression, military/veteran status, disability, matriculation, political affiliation, genetic information, immigration status, or any other characteristic protected by applicable laws.
- **Diversity and Inclusion:** Exercising diversity when selecting subcontractors. Making good faith efforts to provide opportunities for diverse subcontractor participation and selection.
- **Child Labor and Young Workers:** Complying with applicable local child labor laws and only employing individuals who meet the minimum legal age. Employees under the age of 18 should not perform work in a hazardous work environment or at night.
- **Freely Chosen Employment:** Consistent with the principles of the Labcorp Combatting Modern Slavery statement, Suppliers must maintain a work environment that is free from human and sexual trafficking, forced, indentured, involuntary and bonded labor and unlawful child labor.
- **Employee Disclosures:** Suppliers must not use misleading or fraudulent recruitment practices and shall disclose to employees all information regarding key terms and conditions of employment.
- **Wages, Benefits and Working Hours:** Paying employees according to all applicable wage laws, including minimum wages, overtime hours and mandated benefits, in addition to paying employees in a timely manner.
- **Privacy and Data Protection:** Respecting individuals in a manner consistent with the rights to privacy and data protection. You shall at all times use information about people appropriately for necessary business purposes and protect it from misuse to prevent harm to individuals such as discrimination, stigmatization or other damage to reputation and personal dignity, impact on physical integrity, fraud, financial loss or identity theft with appropriate technical and organizational safeguards.
- **Freedom of Association:** Respecting the rights of employees to associate freely and engage in collective bargaining in accordance with local laws, including to join labor unions and workers organizations.

Environment

Suppliers must provide safe working conditions and a healthy work environment. This includes:

- **Environmental Authorizations:** Complying with all applicable environmental, health, safety and quality laws. All required environmental permits, licenses, information registrations and restrictions shall be obtained and their operational and reporting requirements followed.
- **Worker Protection:** Protecting employees from chemical, biological and physical hazards by establishing safety processes and controls to prevent the occurrence of hazardous incidents and to take appropriate remedial action if such incidents occur. Educating workers on the potential risks of activities and providing tools to perform their assignments in a safe and environmentally responsible manner.
- **Emergency Preparedness and Response:** Establishing emergency response plans and procedures and providing training to the appropriate individuals.
- **Quality:** Where applicable, comply with quality regulations and standards (such as Good Manufacturing Practices (GMP), Good Laboratory Practices (GLP) and Good Clinical Practices (GCP)) for the markets in which products may be registered and distributed. Meeting generally accepted or contractually agreed upon quality levels in providing services.
- **Security:** Implementing sound security practices and processes across the supply chain.
- **Sustainability:** Operating sustainably and undertaking initiatives to promote greater environmental responsibility, which shall include, without limitation, conserving energy and natural resources, improving efficiency to reduce the consumption of resources including energy and water, reducing emissions, using sustainable and renewable technologies, pollution prevention and waste reduction, and minimizing the use of hazardous or conflict materials.
- **Waste and Emissions:** Having systems in place for safe handling, movement, storage, disposal, recycling, reuse and management of raw materials, waste, emissions and wastewater discharges.

Management Systems

It is the Supplier's responsibility to determine how to meet and demonstrate compliance with the principles and standards as stated in this Code. Where specified in contracts, Labcorp shall retain audit and inspection rights to verify compliance. Suppliers are expected to implement management systems to facilitate compliance with applicable laws and the principles of this Code that include:

- **Training and Competency:** Developing and maintaining management and employee training programs to facilitate proper implementation of policies and procedures and to fulfill Supplier's improvement objectives. Establishing mechanisms that enable staff and supply chain to gain an understanding of the principles in this Supplier Code of Conduct.
- **Documentation:** Maintaining documentation that displays adherence and conformance to the principles of this Supplier Code of Conduct.
- **Audits, Assessments, Corrective and Preventive Action:** Conducting periodic self-evaluations to verify compliance with applicable laws, regulations and this Code. Suppliers will have a process for timely correction of any deficiencies identified by an internal or external audit, assessment or inspection. Suppliers will identify preventative action and a process for evaluating effectiveness of corrective actions taken.
- **Continual Improvement:** Maintaining an ongoing process to obtain feedback on Supplier's practices related to this Supplier Code of Conduct and to embrace improvement.
- **Commitment and Accountability:** Allocating resources to satisfy the expectations of the Supplier Code of Conduct.
- **Risk Management:** Implementing industry-standard mechanisms to determine, manage, and/or mitigate risk.
- **Selection and Monitoring:** Applying the principles outlined in the Supplier Code of Conduct when selecting their own suppliers and partners. Implement systems to monitor supplier and subcontractor compliance.



Supplier Tips

- **Purchase Orders:** Labcorp issues purchase orders prior to performance of most work. Purchase orders will state a total amount committed, not to be exceeded, and a brief description of the item or services ordered. When asked to perform by a Labcorp employee, you are encouraged to seek a purchase order number at the same time.
- **Invoicing:** Suppliers must send invoices in a timely manner, unless otherwise stated in the contract, it must be sent to the address on the Labcorp purchase order and must clearly indicate the Labcorp purchase order number. Unless outlined differently in a written agreement or on the purchase order, standard payment terms are Net 45 from the date of a properly received, appropriate invoice.



Disclosure

As a responsible business partner of Labcorp's, Suppliers must fully and voluntarily disclose material information, events or incidents, which may affect Labcorp's relationship with the supplier, including but not limited to conflicts of interest, supply chain disruptions, exposure to sanctioned countries, entities or persons or investigations by regulators in any country regardless of whether a judgment, penalty or finding was issued.

Raising Concerns

Suppliers are required to encourage employees to report concerns without fear of reprisal and take corrective action, if needed. Suppliers must provide a mechanism for employees to report actual or suspected violation of this Code, Supplier policies or law on a confidential basis. Channels for anonymous reporting should be provided, where permitted by law.

Suppliers should not retaliate against anyone for reporting a concern or suspected violation.

Labcorp prohibits retaliation of any form against someone who has made a good faith report of a suspected violation of this Code, Labcorp policy or applicable law or regulation.

References

Please consult the Labcorp supplier portal for references and further information:

[Labcorp.com/suppliers-and-vendors](https://labcorp.com/suppliers-and-vendors)



Suppliers are expected to take necessary corrective actions to promptly remedy any identified noncompliance with this Code.

Supplier's employees or contractors may report suspected violations of this Code to Labcorp at labcorp.ethicspoint.com, which allows for anonymous reporting, if desired. Labcorp reserves the right to terminate its business relationship with any Supplier who is unwilling or unable to comply with this Code when termination is allowed by local laws.

