

A woman in a dark blazer and white polka-dot shirt is smiling and gesturing with her hands while talking to two male doctors. One doctor is wearing a light blue shirt, a striped tie, and a stethoscope, and is holding a white folder. The other doctor is wearing blue scrubs and glasses. The background is a bright, modern hospital hallway with large windows.

Doing the Right Thing

IQVIA Code of Conduct

Our Code of Conduct, *Doing the Right Thing*, is a guide to the responsibilities we share for ethical business conduct. It will help you know and apply our requirements for appropriate behavior. While we cannot give guidelines for all situations, we can point out potential issues and give general guidance to help you in your decision-making. Our Code also provides you with resources for asking questions or reporting concerns.

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Introduction: Letter from our Chairman and CEO



Dear Colleagues,

Wherever IQVIA does business in the world, the fundamental values of honesty, integrity, and ethical conduct form the core of everything we do. Our reputation is shaped by the personal decisions of every employee. Each of us must strive to be decent and fair-minded, and do what is right on the job, even in the most difficult situations.

Our Code of Conduct, *Doing the Right Thing*, paints a clear picture of what we stand for as an organization, what we expect of ourselves, and what we must do to maintain our reputation. It governs how we carry out our work and clarifies what each of us must do. There are simple and practical steps everyone can take to translate our values into behaviors, including:

- Reading and referring to this guide regularly to ensure that you understand our standards for ethical behavior and the laws that govern our work.
- Using the resources listed in this Code, such as our Ethics Line, to ask questions about these standards or raise a concern about a possible violation, even if you are not sure. Poor judgment — including the failure to report actual or suspected violations — can cause deep and lasting harm to our company.

- Making sure you understand and comply with all standards contained in the Code that apply to your work.
- Understanding that you are free to speak up and seek guidance — without fear of retaliation. Every manager must create an environment in which employees are comfortable reporting known or suspected violations or concerns.

Following our Code of Conduct is a top priority for our business and our leadership. These are absolute requirements for working at IQVIA, and each of us must remain 100 percent committed to them, 100 percent of the time. Thank you for your commitment to relentlessly upholding the high ethical standards we have set for ourselves.

Regards,

A handwritten signature in black ink that reads "Ari Bousbib".

Ari Bousbib

Chairman and CEO

IQVIA

IQVIA's vision and values

OUR VISION

We deliver integrated information and technology solutions to drive healthcare forward.

Our industry is working to improve real-world patient outcomes through treatment innovations, care provision, and access to healthcare. For the information, technology, and service solutions they need to drive new insights and approaches, they rely on us. Our team intelligently connects insights, commercial and scientific depth, and executional expertise to empower clients to achieve some of their most important goals: Improving clinical, scientific and commercial results. Realizing the full potential of innovations. And, ultimately, creating a healthier world.

OUR VALUES

CLIENT FOCUS: We are passionate about our clients' success.

We place our clients at the center of everything we do. We develop a deep understanding of the challenges they face in order to build successful, enduring relationships with them. We adapt to changing circumstances in partnership with our clients to develop flexible, innovative solutions to enable their success.

RESULTS DRIVEN: We get results.

We set high, but achievable goals for ourselves, persist in spite of obstacles, and demonstrate accountability for our work, regardless of the outcome. We seek to win, but not at all costs. How we get there is just as important as what we achieve.

TEAMWORK: We do our best work together.

We work together across boundaries, trusting each other to share knowledge openly, approaching challenges proactively and engaging collaboratively to deliver our best work. We win as a team and lose as a team.

FLAWLESS EXECUTION: We deliver outstanding work.

We are passionate about our work and want our name to stand for excellence. We are proactive and deliver high-quality solutions. We acknowledge our mistakes and use them as an opportunity to learn and continuously improve our work.

INTEGRITY: We always do what's right.

We know the difference between right and wrong and choose to do what's right — for our employees, clients, and patients — every time. We seek out diverse perspectives, communicate openly and honestly, and treat others with respect.



IQVIA's commitment

Further guidance

[Ethics and Compliance Office](#)

[Legal Department](#)

[Office of the Chief Medical and Scientific Officer](#)

[Human Resources](#)

[Internal Audit](#)

IQVIA has strong organizational functions that support ethical behavior, corporate compliance, and achieving results with integrity.

IQVIA's Ethics and Compliance program helps to foster a culture of compliance and ethics throughout the Company. It does this through developing and implementing global programs, which assess compliance risks; setting standards and policies; and monitoring, auditing, and investigating compliance-related issues.

Other functions supporting our commitment to ethics and compliance include the Legal Department, Human Resources (HR), Internal Audit, and the Office of the Chief Medical and Scientific Officer.



General responsibilities

Non-retaliation

IQVIA strictly prohibits retaliation against employees who in good faith:

- Report or raise a question about any potential non-compliance,
- Make a complaint,
- Assist in making a complaint, or
- Cooperate in an investigation.

Anyone engaging in such retaliation will be subject to discipline.

If someone retaliates against you, contact your manager, your local Human Resources representative, the Legal Department or the [Ethics Line](#).

Integrity is a core IQVIA value.

We are all responsible for ethical business conduct.

Your responsibilities include:

- Reading and following this Code,
- Reading and complying with IQVIA's Corporate Policies and other policies and procedures that apply to your respective duties,
- Acting with integrity and in a professional manner,
- Not engaging in any unlawful or unethical activities, and
- Seeking guidance when needed from the resources listed in this Code.

If you know of or suspect misconduct or a violation of our policies or procedures, you owe it to yourself, your colleagues, and IQVIA to report your concerns. You may report violations or suspected violations to your manager, another manager, your local HR representative, the Legal Department, the Ethics and Compliance Office, or via the Ethics Line.

The responsible business practices identified in this Code apply in all countries where we do business. They also apply to all IQVIA employees, directors, officers (collectively for purposes of this Code, referred to as "employees"), as well as to non-employees such as contractors. Except as otherwise specifically noted, and without conferring employment status on them, contractors are also referred to in this Code, for ease of readability only, as "employees").

Protection from retaliation

IQVIA's non-retaliation policy protects people who raise concerns or seek advice. This means that you can raise or report an issue in good faith or participate in an investigation, and others may not take negative actions against you.

Managers' additional responsibilities

IQVIA expects its leaders to set the tone for ethical conduct by:

- Leading by example and exemplifying IQVIA's values,
- Communicating the importance of *Doing the Right Thing*,
- Creating an environment where people feel comfortable asking for help or raising concerns,
- Reporting possible non-compliance, and
- Not taking or allowing retaliatory actions against people who report concerns or participate in Company investigations.

General responsibilities



Q&A

What does it mean to make a report “in good faith”?

“Good faith” means coming forward with information about a situation that you believe violates this Code, IQVIA’s policies, or the law. Even if you only suspect that misconduct has occurred, you should speak up. It is okay if it turns out that you were mistaken so long as the report was made honestly. An example of a report that is “not in good faith” is if you make untrue statements to “get back” at someone you do not like.

Anyone who knowingly makes a false accusation or knowingly gives false information may be subject to disciplinary action.

What is retaliation?

“Retaliation” means taking adverse action against someone as revenge or “payback” for something they have done. Retaliation can take many forms and be direct or indirect. Examples of direct retaliation include termination, demotion, pay cut, or negative performance evaluation without performance justification.

Examples of indirect retaliation include exclusion from team meetings or Company-sponsored social events.

I know about a violation of our finance policies, but I am afraid to report it. If I make a report, how does IQVIA protect me from retaliation?

We take measures with each report to help protect the person making it. Such measures can vary but may include:

- Reminders to those involved of the non-retaliation policy,
- Ongoing monitoring of the issue, or
- Corrective action for retaliation (if any occurs).

You should always report any actual or perceived retaliation so that any necessary corrective action can take place.

We forbid retaliation against anyone who reports in good faith any potential non-compliance or makes a complaint.



Organization of *Doing the Right Thing*

Further guidance

Corporate Policies can be found using the following link:
[IQVIA Corporate Policies](#)

Doing the Right Thing is the central guiding document of our Company philosophy on ethics, integrity, and decision making. The Code is organized around subject matter areas, and includes references to Corporate Policies that reinforce and reflect our culture and core values.

In the Code, you will learn more about our Corporate Policies, which state requirements or limitations for behavior and decision-making. All Corporate Policies can be accessed through the IQVIA intranet site. Although not every Corporate Policy will be discussed in the Code, you will be directed to resources where additional information on specific policies can be found. All employees are required to periodically read and acknowledge the Code and applicable policies, as assigned.



Business ethics

IQVIA has an unwavering commitment to the highest ethical standards.

IQVIA's business activities touch many others, including patients, trial participants, employees, customers, and investors. Building trust and sustained business success depends on honest, ethical behavior. Acting ethically involves making the right choices in line with IQVIA's standards. Acting ethically also means conducting IQVIA's business in compliance with the spirit and letter of applicable laws and regulations.



Business ethics

Further guidance

[Anti-Bribery and Anti-Corruption Corporate Policy](#)

[Healthcare Professionals and Government Officials Corporate Policy](#)

“Government officials” include:

- Doctors, pharmacists, and other healthcare providers affiliated with a government entity such as government hospitals or universities,
- Public health officials,
- Customs and importation officials,
- Healthcare regulators, such as inspectors,
- Officials responsible for product approval and registration,
- Officials responsible for product pricing,
- Officials responsible for product reimbursement, and
- Officials responsible for placement of products on hospital formularies.

Anti-bribery and anti-corruption

IQVIA does not tolerate bribery or any form of corruption. In virtually every country in which IQVIA does business, it is unlawful to make a payment to a government official for the purpose of obtaining or retaining business, or for a competitive business advantage. In many countries, private commercial bribery is also prohibited. The effects of bribery and corruption are widespread. They are harmful to both businesses and individuals. IQVIA is subject to the U.S. Foreign Corrupt Practices Act and the U.K. Bribery Act - regardless of the country in which the relevant activities take place and regardless of the nationality of the employee(s) involved. IQVIA also is subject to anti-corruption legislation in the countries where we conduct business. Corruption carries consequences both for the Company and for individual employees.

You must not give or receive bribes or engage in other corrupt practices. This prohibition applies even in countries where bribery is common and local legal and/or cultural standards allow it. IQVIA forbids offering, authorizing, committing, or providing anything of value, either directly or indirectly (such



Business ethics



as by making a charitable contribution), to or for a government official, or to or for a business person, in an attempt to:

- Sway official action,
- Win business, or
- Get an improper advantage.

IQVIA also prohibits facilitation payments, which are payments to government officials to expedite the performance of routine governmental actions (e.g., obtaining licenses, permits, or other needed government documents). Facilitation payments do not include paying a legitimate, published fee for speedy service provided by the government. For example, a published amount to get a visa or new passport more quickly from the consulate. Payment of such fees is permitted, provided there is a business need, the payment is transparent and open, a receipt is obtained, and the expense is properly recorded in IQVIA's financial books. For further assistance, contact the Legal Department or the Ethics Line.

IQVIA has a system of financial and accounting procedures that must be followed, including internal controls to maintain accurate and transparent books and records.

IQVIA and individual employees involved in the matter may be held liable for a bribe given or offered on IQVIA's behalf by a third party. Employees must take reasonable precautions to ensure that all third parties they engage have solid qualifications, charge customary fees, have no apparent conflicts of interest, and are willing to sign a written contract that includes a

statement that they will not make payments prohibited by law. Third parties include suppliers, agents, brokers, consultants, and joint venture and alliance partners. Employees should exercise due care in selecting such business partners to ensure they are reputable, honest, and qualified for their roles, and in monitoring their activity once selected.

IQVIA's has adopted mandatory due diligence procedures for certain third-party intermediaries.

You must report actual or suspected violation of our Anti-Bribery and Anti-Corruption Policy by the Company, an employee, a customer or any third party to the Legal Department, the Ethics and Compliance Office, or the Ethics Line.



Q&A

IQVIA hired an agent to help on a project, and he demanded an additional large cash payment in order to get a government approval that we need quickly. If we do not get the approval, we will miss a project deadline. What should I do?

This is an unusual request. Do not make the payment without knowing how the agent will use the money. You must be sure the agent does not use the money for an improper purpose, such as a bribe. Contact the Legal Department, the Ethics and Compliance Office, or the Ethics Line for more assistance.

Business ethics

Further guidance

[Antitrust and Fair Dealing](#)

[Corporate Policy](#)

[Legal Department](#)

Antitrust and fair dealing

IQVIA competes vigorously and fairly for business based on the merits of our products and services. IQVIA complies with applicable antitrust and competition laws, which vary from country to country and help to promote free markets. These laws require companies to compete individually rather than join together to unfairly restrain trade. Antitrust and fair competition laws are strictly enforced. Violations may result in harsh penalties imposed on IQVIA and its employees.

Competitors

IQVIA prohibits conduct that may violate antitrust and competition laws. Such laws restrict competing sellers from engaging in certain activities such as price fixing, allocating markets, and group boycotts.

We must never even appear to agree with a competitor on limiting our competition. Except during approved discussions (like those covered by trade association rules), do not communicate with competitors on sensitive topics such as:

- Past, present, or future prices,
- Pricing policies,
- Discounts,
- Marketing strategies, or
- Expansion plans.

Customers

Antitrust and competition law restrictions may also apply to certain agreements between competing buyers and, in certain circumstances, between seller and buyer. IQVIA's actions must not give the appearance of an attempt to engage in unfair competition. Consult with the Legal Department before entering into agreements to:

- Limit the individuals or firms from whom we will purchase goods or services,
- Limit a customer's right to purchase goods and services from others,
- Unfairly discriminate with respect to price, discounts, or allowances among similarly situated and competing customers, or
- Not work with a competitive product.

Trade association activities

Trade association meetings and other industry gatherings serve legitimate business purposes. They also can pose risks because competitors often attend and discuss topics of mutual concern. Trade associations usually have procedures in place for sharing information. Be sure to follow such procedures when attending trade associations or related social events. Do not discuss with competitors sensitive topics such as pricing.

Business ethics



Competitive information

Information about competitors is a valuable business tool, but it must be obtained from public sources. These sources include websites, public presentations, journal articles, or advertisements. Do not seek competitive information illegally or in any improper way. Also, do not misrepresent who you are or for whom you work. Always keep confidential the information of our customers, vendors, and competitors in accordance with IQVIA confidentiality policies. Do not use customers' or competitors' employees as sources of non-public information. Do not discuss the confidential information of a former employer. No one at IQVIA should ask you to give such information.

Speaking and writing

Be prudent how you speak and write. Competition law violations often involve questions of intent and motive. Documents and written or spoken communications that are poorly worded can be misinterpreted. Examples of statements to avoid include, *"We will crush the competition,"* or *"I can't wait to put them out of business."*

Fair dealing

We seek competitive advantage through superior performance, not through unfair or illegal business practices. We must deal fairly with our customers, vendors, competitors, and employees. You should not take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any other unfair dealing

practice. For example, you must make truthful statements about our services and not make false statements about a competitor.



Q&A

At a trade show, I was with a group of people who began to talk about discount pricing and marketing strategy. I became concerned and asked them to stop discussing this topic. Did I do the right thing?

Yes. If a competitor or other person tries to talk about such topics, stop the discussion immediately and, if necessary, leave the area.

I am trying to win a big contract for IQVIA. May I pretend to be from the customer to get information about a competitor's proposed bid?

No. Obtaining information from a competitor by misrepresenting your identity is not appropriate. You must be honest when gathering information about our competitors.

My cousin works at a competitor and wants to exchange price information. He wants the information only for benchmarking purposes. Is this okay?

No. IQVIA prohibits exchanging price information with a competitor. This is highly confidential information and, if given, could create the appearance of an agreement to fix prices.

Business ethics

Further guidance

[Political Campaign and Government](#)

[Affairs Activities](#)

[Corporate Policy](#)

Political campaign activity

We encourage your participation in civic activities. For example, service on governmental bodies, work with advocacy organizations, or participation in political campaign activities. Such activities are considered personal, volunteer activities and should be undertaken on your own time and in compliance with Company policies. No IQVIA employee nor anyone acting on IQVIA's behalf may make any direct or indirect political contribution or expenditure on behalf of IQVIA unless authorized in writing by the Legal Department.

In addition:

- Company managers may not solicit political contributions from non-executive employees who are in their direct reporting line,
- Employees may not use their work email accounts to send campaign-related emails to employees or external parties, and
- IQVIA facilities may not be used to host political campaign events, such as fundraisers for candidates, without the approval of the Legal Department.



Business ethics

Further guidance

[Gifts and Entertainment Corporate Policy](#)

“Gifts and entertainment” means anything of value for which you are not required to pay the retail or usual and customary cost, including meals, refreshments, tickets to entertainment or sporting events, travel, or accommodations.

Gifts and entertainment

Gifts and entertainment to, from, or for customers, vendors or other third parties must be:

- Legal, non-repetitive, and appropriate for the level of both giver and receiver,
- Of a reasonable value, and
- Accurately recorded in accordance with Company expense reporting and internal accounting requirements.

Examples of such acceptable gifts would be IQVIA-branded items, a small fruit basket, or candy. Examples of acceptable entertainment would be an occasional meal, or attendance at an entertainment or sporting event. A representative of the Company hosting the event must be present at the event. If the host is not present, then the entertainment event must be considered to be a gift and is subject to the limitations for gifts below.

Gifts and entertainment involving third parties may NOT be:

- Offered or accepted in exchange for receiving or giving something in return,
- Offered or accepted to secure an improper advantage,
- Used to influence, or appear to influence, your ability to act in the best interests of IQVIA, such as a gift given or received during vendor selection,

- Solicited by IQVIA employees,
- Cash or cash equivalents such as physical or virtual gift cards or gift certificates,
- Offered or accepted by a family member, or
- Excessive.

More restrictive gift and entertainment standards may apply in local offices or business units. If there is a conflict between standards, the more restrictive standard must be followed.

If you are not sure about giving or receiving a gift or entertainment, talk to your manager, the Ethics Line or the Legal Department. If you are unable to ask for guidance, do not give the gift or politely decline the gift. Giving and receiving amounts outside of our policy restrictions requires prior written approval from the Legal Department.

Employees also must follow standards set forth in our Healthcare Professionals and Government Officials Corporate Policy. For guidance on standards governing gifts and entertainment involving only IQVIA employees, please refer to the Global Travel and Expense Policy.

Further guidance

[Global Travel and Expense Policy](#)

[Healthcare Professionals and Government Officials](#)

[Corporate Policy](#)



Q&A

May I buy a gift for a physician who is managing a study for IQVIA?

There are very few situations where it is acceptable to give a gift to a healthcare provider. Many laws and rules apply to giving gifts, including meals, to physicians. It is IQVIA's policy to meet all such restrictions. Other Corporate Policies, such as those about interactions with healthcare professionals and government officials, and anti-kickback, place limits on gifts to physicians.

As applicable to Company services, you must follow industry guidelines such as the US PhRMA Guidelines on *PhRMA's Principles on Conduct of Clinical Trials* which applies to studies on investigational products. The PhRMA Code and the U.K.'s *ABPI Code of Practice* and other similar guidelines apply to approved medical products. Finally, our clients and those who employ doctors often have their own policies on physician gifts, which we may agree by contract to comply with. If any of these standards conflict, you must follow the most restrictive standard.

Our Gift and Entertainment Corporate Policy limits the cost of entertainment that I can receive from a vendor. How do I know whether an event or dinner with a vendor meets our standards?

Be proactive before accepting invitations from vendors. Before accepting an invitation to a dinner or other event, tell the vendor about our policy. Then ask for some basic information about the event. Vendors should be respectful of our policy as we should be of theirs.

Business ethics

Further guidance

[Charitable Contributions
Corporate Policy](#)

Charitable contributions

IQVIA is committed to supporting the communities in which we work and live. IQVIA employees have volunteered their time and resources to help make a positive difference. IQVIA has chosen to focus on a variety of community and philanthropic support activities. Employees must follow the Charitable Contributions Policy when making charitable contributions on behalf of the Company to any not-for-profit organizations or educational institutions.



Patient safety and medical ethics

IQVIA acts with integrity and in full compliance with ethical standards.

Information saves lives. Much of IQVIA's work affects patients, including patients who participate in clinical research and patients whose care will be affected by the knowledge that we help develop. We are committed to aligning this work with widely accepted medical-ethical standards.



Patient safety and medical ethics

Further guidance

[Biomedical Research Ethics and Protection of Clinical Trial Participants Corporate Policy](#)

[Office of the Chief Medical and Scientific Officer](#)

Protection of trial participants and patients

We are committed to helping ensure that clinical trial participants participate in research that is scientifically valid and has an appropriate benefit-risk profile, adequate informed consent, and adequate oversight. Globally accepted principles inform the clinical research conducted by IQVIA. These principles include the Nuremberg Code, Belmont Report, Declaration of Helsinki, and the consensus of the global medical-ethics community. Protecting trial participant safety is a primary concern that begins well before participant recruitment and continues for the duration of and after the clinical trial.

Medical-ethical standards

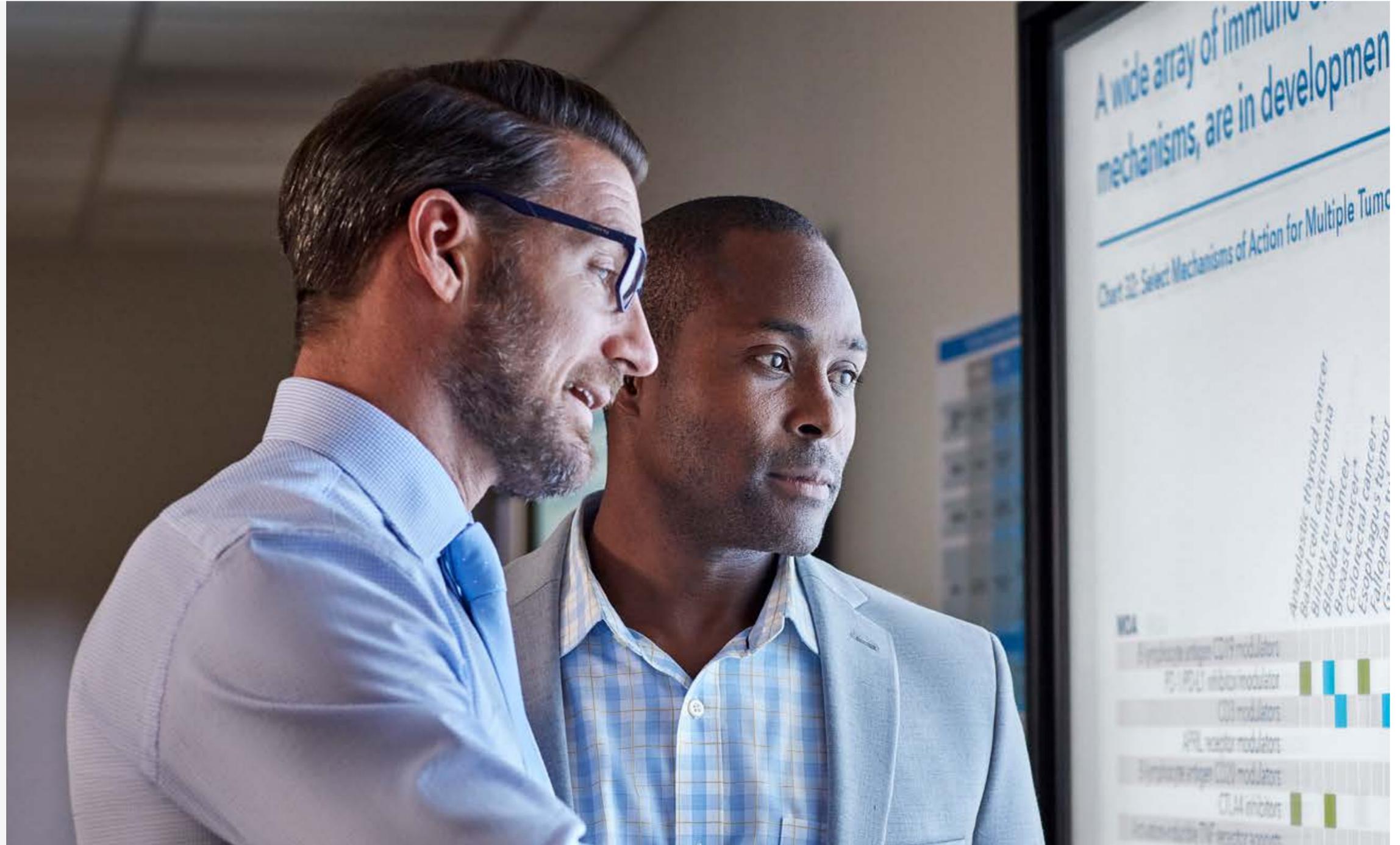
Our position as a global healthcare leader requires us to act consistently with global and widely accepted medical-ethical standards. We see these standards as collaborative and not in conflict with good science and business practices. We seek to proactively identify, assess, and respond to medical-ethical issues. When evaluating such an issue, IQVIA uses an objective, evidence-driven, transparent, and collaborative approach to help protect the safety of our study participants and patients. The Office of the Chief Medical and Scientific Officer supports our efforts relating to the ethical conduct of research.



Biopharmaceutical regulatory compliance

IQVIA is a responsible partner and we conduct our services in full compliance with the laws.

IQVIA is a compliant and responsible company and partner for biopharmaceutical services and is dedicated to operating legally with honesty and integrity. We comply with all applicable laws and regulations as they relate to the provision of biopharmaceutical-regulated activities.



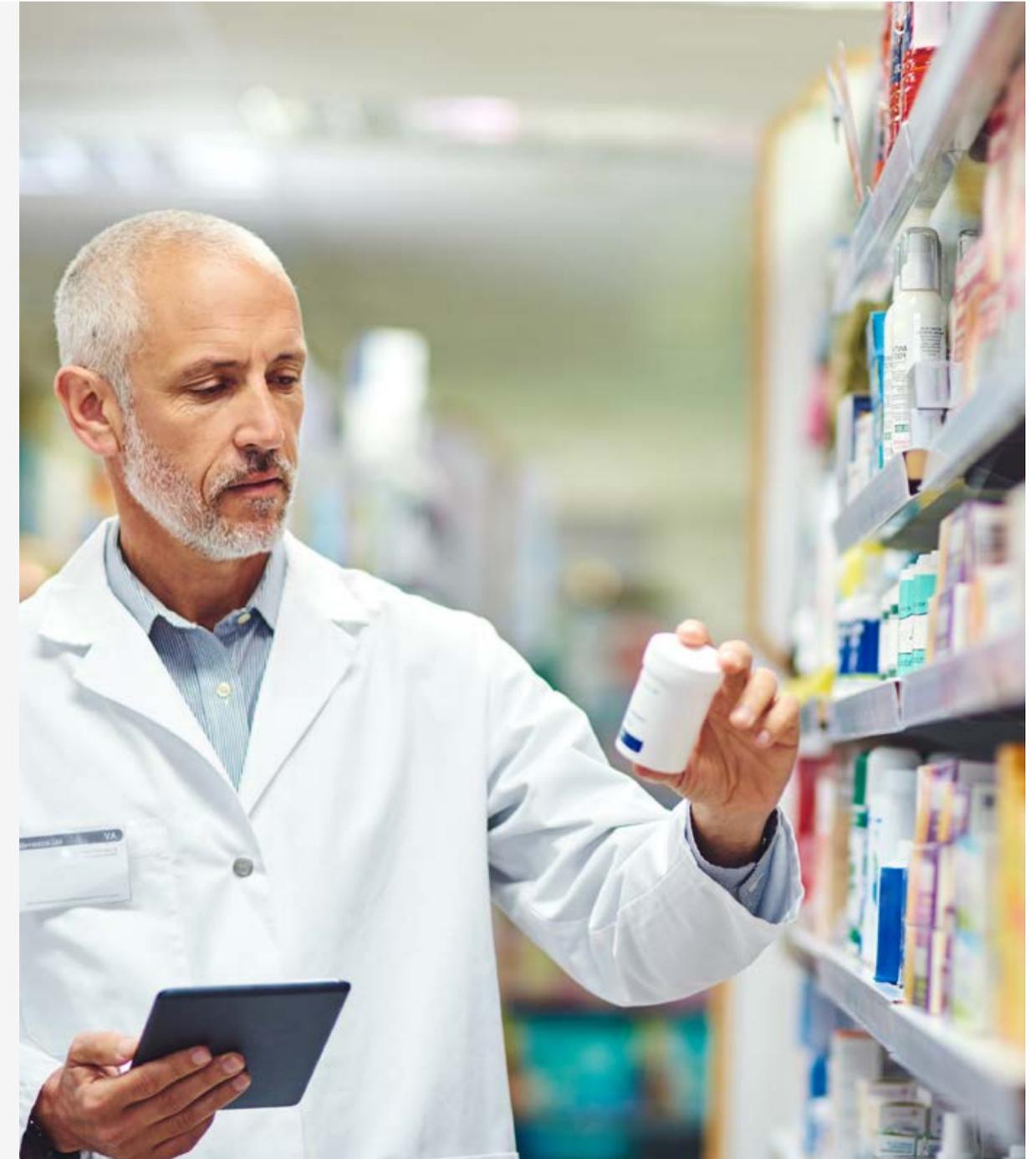
Biopharmaceutical regulatory compliance

Further guidance

[Regulatory Compliance for Clinical Trials and Promotional Activities](#)
[Corporate Policy](#)

Clinical trial regulations

IQVIA is committed to helping develop safe and effective biopharmaceutical products and protecting the rights, safety, and welfare of human participants in clinical research. Compliance with applicable legal requirements and ethical standards that govern the conduct of clinical trials is a foundational requirement for the protection of human trial participants and to ensure the integrity of the study data. Country-specific clinical research laws and regulations, international research standards, along with regulatory agency guidance documents collectively constitute Good Clinical Practices (GCP). We conduct clinical trials in accordance with applicable sections of GCP in all countries in which we operate. We conduct observational and post-marketing trials in accordance with applicable laws and regulations, and international research standards.



Biopharmaceutical regulatory compliance

Further guidance

[Legal Department](#)

Promotional activities

Governments regulate the promotion of our customers' products. Our compliance with applicable legal requirements that govern promotional activities helps ensure that regulated biopharmaceutical products are promoted only for their authorized and labeled purposes. IQVIA complies with applicable legal requirements and industry codes of conduct relating to the promotion of biopharmaceutical products. Promotional materials and presentations must be approved prior to their use and such materials must reflect the labeled and authorized purpose of the product when such materials are regulated. Gifts and entertainment must not be provided as an incentive to prescribe or as an improper incentive to purchase regulated products. Gifts and entertainment must be given in accordance with our policies and procedures. Product sampling practices must meet applicable legal requirements regarding distribution and documentation.

Report any concerns you have regarding promotional practices to the Legal Department or the Ethics Line.



Q&A

A client plans to do a clinical trial in a country, but has no plans to seek approval to sell nor to offer the product in the country.

Is this plan acceptable?

International standards on clinical trials discourage doing clinical trials in markets where there is no intention to offer the product. You should report this to the Chief Medical and Scientific Officer or the Ethics Line. You may also want to remind the customer that it is in their best interest to follow these guidelines.

My manager said I could raise my sales if I told a doctor about a newly discovered use for one of our client's products. This use is not approved yet. May I do this?

No. Such action may constitute unapproved or "off label" promotion. If a doctor requests this information from you, follow the procedures for handling requests for medical or off-label information. You may also contact the Legal Department or the Ethics Line for further guidance.

Biopharmaceutical regulatory compliance

Further guidance

[Healthcare Professionals and Government Officials](#)

Corporate Policy

[Environmental, Health, and Safety](#)
Corporate Policy

Principal investigator compensation/ payees

IQVIA compensates investigators on behalf of Sponsors for providing protocol-required services in clinical trials managed by IQVIA. Such compensation must be fair, reasonable, and at fair market value. Compensation to investigators must comply with Company policies and procedures.

Environmental, health, and safety

IQVIA conducts business in a responsible manner in a way that protects the environment and the health, safety, and security of our employees, customers, patients, contractors, and the public. IQVIA complies with applicable legal requirements and industry standards related to environmental, health, and safety.

You have an active role in helping to ensure a safe, healthy, and secure work environment. You must follow all safety and security rules and procedures that apply to your location and participate in required training.

You should promptly report hazardous situations or other risks to the correct department for your location. You should also know the emergency and evacuation actions and telephone numbers for your work location. Always wear any protective equipment or clothing assigned to your work.



Biopharmaceutical regulatory compliance

Further guidance

[Legal Department](#)

[Healthcare Professionals and
Government Officials](#)

Corporate Policy

[Gifts and Entertainment](#)
Corporate Policy

[Regulatory Inspections](#)
Corporate Policy

[Government Contracting](#)
Corporate Policy

Government interactions and contracting

Interacting with government officials

Our employees around the world regularly deal with government officials, including officials from agencies that regulate certain areas of our business. Certain laws and regulations apply to the way in which we may interact with government officials. These laws may prohibit the giving of entertainment or gifts to such officials. It is our policy to meet all such requirements. If you interact with government officials on behalf of IQVIA, including hosting government inspections, you must follow our policies and procedures regarding such interactions.

Government contracting

When we provide services to a government agency, we take on more responsibilities than with private business transactions. For example, for U.S. government contracts we must meet some Federal Acquisition Regulations (FAR) and Agency Supplements to the FAR. In working with U.S. government

agencies, we have to disclose any known event of fraud, conflict of interest, bribery, or overpayment. In addition, if you are a Principal Investigator or key personnel on a project funded by the U.S. government, you may be required to comply with financial disclosure requirements. You must be sure that these certifications or representations made to any government agency are accurate. They must also be reviewed and approved by the Legal Department before being signed by an authorized IQVIA officer.

In Europe, government contracts requirements may include compliance with regulations, directives, or annexes issued by the European Commission, or legislative provisions and procurement rules of member states. In other locations, any applicable requirements shall be identified prior to entering into a government contract.

Communication and data protection

Information saves lives. IQVIA values and protects information and data as core business assets.

With trust vital for IQVIA's continued success, each of us must comply with IQVIA's standards for communication and protection of personal, confidential, and proprietary information. Whether communicating internally or externally, IQVIA speaks with a voice that is clear, honest, and consistent across all media.



Communication and data protection

Further guidance

[Media Relations](#)

Corporate Policy

[Marketing and Branding](#)

Corporate Policy

[External Publications and Presentations](#)

Corporate Policy

[Regulation FD \(Fair Disclosure\)](#)

Corporate Policy

[Financial Oversight, Controls, and Reporting](#)

Corporate Policy

Communication

Accurate communication with our employees, customers, investors, and the public is critical to our success. Our reputation depends on providing information that is timely, accurate, and consistent.

- **Media relations:** We value our relationship with the media. IQVIA has designated individuals as authorized contacts for all media engagement activities to maintain consistent, coordinated responses, and to ensure that all inquiries are handled appropriately by experienced media relations professionals within our organization. Unless you are authorized to speak on our behalf, promptly send any media inquiries to the Enterprise Communications Team.
- **Advertising and promotion:** We must describe our products and services accurately. All advertising and promotional claims and marketing materials in any format must receive all necessary approvals. All employees must use the Company's existing brands, trademarks and service marks in accordance with our brand standards.
- **Public presentations and articles:** IQVIA employees often have opportunities to give public presentations or publish articles on their work or areas of expertise. Your presentations and articles should never disclose Company or customer proprietary information. Prior to use or publication, all such articles or presentations must receive all appropriate approvals consistent with Company policies before releasing.

- **Financial disclosures:** Any external communications regarding IQVIA financial or other confidential information must be in accordance with our fair disclosure, and financial reporting and disclosure policies.



Q&A

I know that our product development group is in the process of developing a new product. I'm trying to close a big sale with a new customer. I'm sure I could make the sale if I promise the customer that the new product will be available by the end of the year. I don't think this is deceptive because we are actually working on the product now. You cannot claim attributes for a product that it does not have. Even if you have been authorized to tell a customer a new product is under development, if you have not been officially notified by the Company when the product will be available, you must not promise that product by a particular date.

Communication and data protection

Further guidance

[Social Media](#)
Corporate Policy

Social media

Social media, such as Twitter, Facebook, and LinkedIn, bring opportunities to build conversations and communities, but it also brings risks.

You must engage in social networking conduct in a manner consistent with IQVIA's policies, whether engaged in Company-related activities or personal activities that may impact the Company or its reputation. For example, only authorized employees may represent the Company in social media. In addition, employees may not engage in social media postings that are inconsistent with or violate Company policies or procedures, including the Respectful Workplace Policy and confidentiality policies that prohibit the disclosure of confidential or proprietary information of IQVIA or its customers. You must not comment on the Company's business, products, or services without identifying yourself as an employee and including a disclaimer that the views are personal and not the views of the Company.



Communication and data protection

Further guidance

[Confidentiality](#)
Corporate Policy

“Confidential information” includes information that is not publicly known, and information received from third parties which may be subject to non-disclosure obligations.

Typical examples include:

- pricing information;
- unpublished revenues, profits, or other financial data;
- human resources data;
- business processes, plans, and strategies;
- computer software programs, programming, and source code;
- customer and employee lists;
- business methods or systems.

[Regulation FD \(Fair Disclosure\)](#)
Corporate Policy

Confidentiality

IQVIA considers confidential information a valuable business asset. We each must sign a Confidentiality Agreement as part of our work with IQVIA. This agreement and our policies prohibit you from using, duplicating, modifying, or disclosing confidential information of IQVIA or related third parties without appropriate written authorization.

We each have an obligation to protect confidential information we receive or create in the course of our work, as well as other sensitive information we receive from customers, suppliers, partners, and others that may be of use to competitors, or harmful to IQVIA or its customers, if disclosed. You must:

- Be careful when speaking or handling confidential information in public places such as airports, restaurants, or through various public communication channels, such as social media,
- Be careful when using mobile devices or systems,
- Not share confidential information outside IQVIA unless the third party has signed a Confidentiality Agreement or non-disclosure agreement approved by the Legal Department, and if confidential information is shared, ensure that the information is returned or destroyed upon completion of the matter,

- Share confidential information only on a “need to know” basis to third party recipients and when sharing internally to others working for or on behalf of IQVIA, and
- Double check content and addresses on letters, packages, emails, and fax numbers prior to sending confidential information. Think before disclosing.

Some events require specific regulatory reporting timelines. Upon discovery, immediately report any misdirected fax, email, mail package containing confidential information, or other inadvertent disclosure, to your manager and a member of the Legal Department or Privacy team. Then, take steps to retrieve the information or have it deleted or destroyed by the recipient.

If you leave IQVIA, you must promptly return all reports, information, and other materials relating to IQVIA. You will be prohibited from using any information or procedures relating to IQVIA or our customers for the benefit of yourself or others. This prohibition shall continue after you leave the employ of IQVIA.

Communication and data protection

Further guidance

[Protection of Personally Identifiable Information Corporate Policy](#)

Personal Information protection

It is our policy to comply with laws and regulations governing the collection, use, distribution, and security of any Personal Information we create, receive, maintain, or transmit.

Personal Information is any information or set of information about an identified or identifiable individual that identifies, or when used in combination with other information identifies, an individual. Examples include a person's name, home address, phone numbers, personal email address, or information about an individual's health, race, or religious beliefs. Personal Information can be in any media or format, including computerized or electronic records as well as paper-based files.

You are expected to:

- Protect and process Personal Information to which you have access in accordance with our data confidentiality and protection of personal information policies and procedures,
- Meet our strict internal and external controls to respect the privacy of patients by avoiding the use of patient-identifiable Personal Information in products and services wherever possible, or, in circumstances where patient-identifiable Personal Information is used by IQVIA, obtain the patient's informed and express prior consent,

- Meet any extra standards required by contract, Delegation Agreement, or Data Transfer Agreement,
- Not disclose personal data to a third party without appropriate authorization,
- Not override the IQVIA technical security measures that are in place such as laptop and portable media encryption,
- Report immediately if you become aware of a privacy incident related to this information, and
- If personal data is to be transferred outside of any country check to determine whether certain agreements may be required.

Our Global Chief Privacy Officer monitors privacy laws and regulations and develops our data privacy policies.

Workforce

IQVIA has a respectful and responsible workplace that promotes leadership and teamwork.

IQVIA is dedicated to creating a productive work environment that exhibits teamwork, leadership, customer focus, integrity, and quality. We comply with all applicable employment laws and regulations.



Further guidance

[Respectful Workplace](#)

Corporate Policy

"Protected status" includes: race, color, gender, creed, religion, marital status, age, national origin or ancestry, physical or mental disability, medical condition, veteran status, citizenship status, gender identity, sexual orientation, or any other protected group status.

Respectful workplace

We strive to create a productive work environment that supports teamwork and trust. We treat each other and anyone we interact with while working for IQVIA with respect and dignity.

Anti-discrimination

IQVIA is an equal opportunity employer. We make employment decisions based on qualifications and merit. We prohibit unlawful discrimination or differing treatment in the conditions of employment based on a person's group status such as age, race, national origin, gender, or other "protected status."

Harassment

We each are responsible for maintaining a workplace free from harassment. Company employees are strictly prohibited from engaging in harassing conduct against other employees or against third parties such as customers or vendors. "Harassment" includes unwelcome verbal, non-verbal, physical, or visual acts based on a person's "protected status." Harassment can:

- Be physical or verbal,
- Take place in-person or by other means, such as email,

- Be sexual in nature, or otherwise inappropriate words or actions, or
- Include jokes, kidding, or teasing.

Types of conduct prohibited by our policies include:

- Slurs, off-color jokes or disparaging comments about such subjects as race, religion, or gender,
- Circulation or posting of items that show hostility towards a person or group,
- Sexual harassment, or
- Offensive physical contact such as grabbing, pinching, or intentional brushing against another person's body.

Abusive behavior

IQVIA prohibits abusive behavior in the workplace. Abusive behavior is defined as malicious behaviors that are repeated and would reasonably intimidate, humiliate, or degrade an individual, or which create a risk to the health of an individual. Examples of abusive behavior include: offensive language, name-calling, insults, mistreatment, deliberate exclusion from work-related activities, or unfairly blaming for mistakes.

Workforce



Violence and threats

IQVIA prohibits acts of violence or threats of violence towards individuals or IQVIA. We prohibit weapons of any type in or on IQVIA property at any time except by law enforcement officers acting in the line of duty or in accordance with applicable local law. If you become aware of a threat or act of violence, promptly report it to local security, your manager or Human Resources representative.

Drugs and alcohol

Being under the influence of alcohol or illegal drugs may lead to situations that endanger you or those who work around you. You may not work while under the influence of alcohol, illegal drugs, or controlled substances (including prescription medicine that is not taken according to the prescription). You may not possess, sell, or distribute illegal drugs while on Company premises, work sites, at IQVIA-sponsored events or while on Company business.

Drinking alcoholic beverages at IQVIA-sponsored events or meals may occur if approved by local management and only if it does not endanger yourself or others, impair your ability to do your job, or adversely reflect on IQVIA.



Q&A

In my country, sexual harassment is not explicitly regulated.

Does IQVIA policy against sexual harassment apply in my office?

Yes. IQVIA policies on discrimination and harassment apply to all of our offices around the world. We must show respect to all of our colleagues at IQVIA. Talk with your Human Resources representative if you are not sure if certain conduct meets our principles of dignity and respect.

A co-worker's drinking gets out of control during team dinners.

She often makes loud, inappropriate comments, and sometimes customers are present. This behavior makes me very uncomfortable, but I am afraid to confront her. What do you suggest I should do?

If your co-worker is drunk, she may endanger the well-being of herself or the others around her. Being drunk in the presence of customers reflects poorly on her and on IQVIA. Speak to a manager or contact local Human Resources as soon as possible.

Speaking up and non-retaliation

IQVIA promotes an open work environment where you are free to respectfully express opinions in an effort to resolve issues or simply speak transparently with colleagues. You are encouraged to openly discuss any problems with your manager so that appropriate action may be identified and taken. Employees should report suspected misconduct or violations of IQVIA's policies and procedures. As a first step, tell your manager or Human Resources representative. If you are not comfortable reporting an issue in this manner, use an alternative resource, such as the Ethics Line.

IQVIA forbids retaliation against anyone for raising a concern or cooperating in an investigation. However, anyone who knowingly makes a false accusation or knowingly gives false information may be subject to disciplinary action. If you believe you are being retaliated against, contact your manager, a Human Resources representative, or the Ethics and Compliance Office.



Q&A

My coworker often talks disparagingly about a colleague's disability. She then covers it up by saying, "I'm only kidding." Is that okay?

No. These actions are not consistent with our standards. Your coworker needs to understand that her comments are not appropriate. You can do this yourself, or ask a manager or Human Resources representative to address the situation, or report it to the Ethics Line.



Further guidance

[Personal Conflict of Interest](#)
Corporate Policy

A “*significant financial interest*” generally means ownership by you and/or your Family Members of:

- more than one percent (1%) of any class of securities of a corporation or
- in an amount that is more than five percent (5%) of the total assets of you or a Family Member

Conflicting personal interests

We respect your right to be involved in personal activities outside the scope of your job as long as they do not get in the way of your work responsibilities. You must avoid any activity or relationship that might conflict or appear to with IQVIA's interests. Such a situation can arise in a variety of ways.

The following sections describe situations where personal conflicts of interest often arise. However, this list does not cover all possible situations where such conflicts might occur.

Financial conflicts of interest

A conflict of interest may arise if you or an immediate family member (e.g., spouse, parent, child, domestic partner, or anyone living in the same household) or similar close personal relation (collectively, “Family Member”) have a financial interest in a job with or serve on the Board of Directors of an actual or potential customer, competitor, or vendor of IQVIA.

A conflict of interest may exist if you or a Family Member directly or indirectly has “significant financial interest” in any company that competes, does business, or seeks to do business with IQVIA.

Other financial interests could be significant. That is why you must disclose virtually any financial interest in such organizations to the Legal Department. This does not apply to a personal investment in publicly traded mutual funds that may include the stock of a customer, vendor, or competitor of IQVIA.

Outside employment

It is sometimes permissible for you to have a second job or be self-employed while working for IQVIA. Any such second job or self-employment must not:

- Compromise IQVIA's interests,
- Involve providing services (whether or not compensation is received) if IQVIA provides that service or a related service in the marketplace,
- Negatively affect your job performance at IQVIA, or
- Restrict your ability to meet your responsibilities to IQVIA.

If you are planning to work in a second job, including self-employment, you must first get approval from your Human Resources representative.

Family members

There may be a conflict of interest if a Family Member works for a IQVIA competitor, customer, or vendor. It may also be a conflict of interest if a Family Member can sway the sale of goods or services to or from IQVIA.

It is usually permissible for IQVIA to employ Family Members, as long as they have no direct or indirect reporting relationship with another Family Member. Contact Human Resources prior to hiring, transferring, or promoting anyone with Family Members that work at IQVIA.

Workforce

Further guidance

[Personal Conflict of Interest](#)
[Corporate Policy](#)

Serving on boards of directors

You must get approval from the Legal Department prior to serving on a for-profit entity's board of directors. You do not need consent for a family business or personal financial management ventures.

Corporate opportunity

You may not (without the consent of the Board of Directors or an appropriate committee thereof):

- Take opportunities for yourself that are discovered through the use of IQVIA property, information, or position,
- Use IQVIA property, information, or position for personal gain, or compete with IQVIA.

You also owe a duty to IQVIA to advance the Company's legitimate interests when the opportunity to do so arises.

Potential analytical bias

Absolute and unquestioned integrity of IQVIA measurements, evaluations, and analyses is vital. You may not engage in any conduct that might interfere, or appear to interfere, with the outcome or integrity of any specific measurement, evaluation, report, or analysis of IQVIA. These processes must be free from any undue influence or bias.

Disclosure

You must disclose potential personal conflicts of interest when they arise to your manager or Human Resources representative, or the Legal Department. Managers who receive such notices must promptly notify local HR or the Legal Department. You must also take any actions deemed by IQVIA as being necessary to address your situation. Most conflicts of interest can be resolved in a mutually acceptable way.



Q&A

I work in the site startup group. My wife is a cardiologist with experience in conducting clinical studies. May I submit her name for consideration as a Principal Investigator for an IQVIA-managed study?

Yes. However, you must disclose your relationship and you should not have any role in the decision on whether to use her services or in any contract negotiations. You must take any necessary steps to manage the conflict.

Business services and practices

IQVIA delivers excellent customer service and creates solutions to drive healthcare forward.

IQVIA seeks to maintain long-lasting customer relationships and deliver excellent customer service. Successful customer relationships require a thorough understanding of customer needs and challenges.



Business services and practices

Further guidance

[Business Engagement Standards](#)
Corporate Policy

[Vendor Selection and Management](#)
Corporate Policy

Business engagement standards

IQVIA develops and revises service offerings to meet the changing needs of our customers and to differentiate our services in the marketplace. Each of us is responsible for delivering excellent customer service while furthering IQVIA's interests. Such responsibilities include but are not limited to:

- Following contracting standards and requirements issued or approved by the Legal Department,
- Obtaining necessary authorizations and approvals for transactions and disbursements, and
- Adhering to Company's requirements for the development of new service offerings.

Vendor selection and management

High quality, cost effective vendors help support our operational needs and customer requirements. We choose vendors based on quality, delivery, service, reputation, and price. All vendors must perform business activities for or on behalf of IQVIA with standards and values that align with our own. We encourage diversity among vendors including small business, as well as women, minority, and veteran owned business. Vendors must agree to follow principles as required by IQVIA. When selecting Vendors or making purchases on behalf of IQVIA, employees must follow applicable finance and procurement policies.

Business services and practices

Further guidance

[Business Engagement Standards](#)
Corporate Policy

International trade controls

We are a global company with offices around the world. We must conduct business in compliance with trade regulations, including export and import controls. Trade controls are complex and vary widely. You should raise any questions to the Legal Department or the Ethics and Compliance Office.

Examples of trade control regulations we must follow include:

Export and import control laws

Export and import control laws and regulations apply to many goods and technical data (including software and investigational drugs). They can apply to items that are hand-carried and may need prior approval, licensing, and reporting. Transfer of technical data to foreign nationals living in the U.S. (including IQVIA employees) may be a “deemed export.” All goods that are imported must be accurately classified to determine any duty owed.

Sanctions

Sanctions and trade limits exist against a number of countries. They may restrict our ability to do business in certain areas.

Denied parties

There are restrictions against doing business with some people, groups, or organizations. They include those designated as terrorists or those supporting terrorism, or drug traffickers.

Prohibited activities

IQVIA prohibits doing business with persons who may be involved in activities such as chemical or biological weapon development.

Anti-boycott restrictions

Laws prohibit IQVIA from participating in certain international boycotts of countries friendly to the U.S. A current example is the boycott by certain Arab nations of Israel. These laws prohibit entering into agreements that have the effect of supporting such boycotts. They also do not allow giving information for boycott-related purposes.

Business services and practices

Further guidance

[Healthcare Professionals and Government Officials](#)
Corporate Policy

If you have questions about whether a specific person may be considered a government official or a Healthcare Professional, contact the Legal Department.

[Gifts and Entertainment](#)
Corporate Policy

[Legal Department](#)

Healthcare professionals and government officials

Many of our services require contact with healthcare professionals and government officials. Laws and regulations often apply to such relations. If your work involves interaction with such persons, you must make sure such interactions:

- Comply with our policies and procedures,
- Serve a business purpose such as education or research, and
- Do not interfere or appear to interfere with a healthcare professional's independent medical judgment or a government official's performance of duties.

When healthcare professionals are engaged as participants in market research, payment, approval, and recordkeeping standards and processes applicable to market research must be followed. When IQVIA procures data from hospitals, pharmacies, and similar organizations, payment, approval, and recordkeeping standards applicable to data procurement must be followed.

Gifts, meals and other benefits must never be for the purpose of, or of such value, that they are likely to improperly influence the healthcare professional's medical or professional judgment or decisions. No gifts, meals, or entertainment may be offered or provided to government officials without the prior written approval of the Legal Department.

In addition to complying with our general standards of integrity and ethical conduct, IQVIA employees must act with integrity in interactions with government officials and healthcare professionals.

Anti-kickback laws

IQVIA complies with applicable anti-kickback laws in the countries where we do business. Payments or compensation to or on behalf of healthcare professionals must never be for the purpose of influencing the healthcare professional to buy, prescribe, recommend, or promote a service, medicine, or device, or as a reward for healthcare professionals' past purchases, prescriptions, or recommendations of medicines or devices.

Contact the Legal Department or the Ethics Line if you think you have been asked to provide anything that may be considered a bribe or kickback. You can also contact them if you learn of such conduct by anyone working with IQVIA or any of our sponsors, vendors, or investigators.



Q&A

A client wants to conduct a study for a marketed product and does not plan to use the data for any scientific purpose. Is this a cause for concern?

Yes. This is one of the factors that helps determine whether a study might be a "seeding study" that is designed to induce healthcare professionals to prescribe the product. Contact the Legal Department or the Ethics Line if you encounter this situation.

Business services and practices

Further guidance

[Legal Department](#)

Aggregate spend reporting

All payments, or other transfers of value, to or on behalf of healthcare professionals, must be fair market value compensation for services provided, documented, and accurately recorded in IQVIA's financial books and records. All such payments and transfers of value also must be tracked in a manner to support compliance with applicable transparency laws and "Sunshine Act" requirements.



Assets

IQVIA protects Company and business partner information and guards against disruption of Company operations.

IQVIA is committed to protecting Company and customer assets and helping guard against disruptions of Company operations. We provide physically secure facilities that meet country or global security standards. Each of us is responsible for helping to maintain and secure IQVIA assets against theft and misuse.



Further guidance

[Integrated Information Security Framework](#)

Corporate Policy

[Data Classification](#)

Corporate Policy

Integrated information security framework

The structure and governance of the IQVIA Integrated Information Security Framework (the “Framework”) helps protect the confidentiality, integrity, and availability of data in IQVIA’s possession. The Global Information Security team is responsible for the development, implementation, and ongoing monitoring of the Framework and associated policies and procedures. All such policies and procedures must be followed.

Data classification

Our Data Classification Policy defines the levels of data classification suited to the business needs of IQVIA. The policy helps ensure that information assets are classified for appropriate controls implemented to safeguard and protect these assets. All Company data must be assigned a level of data classification based on the guidelines provided in the policy.



Further guidance

[Acceptable Use of Information Technology Assets](#)
Corporate Policy

[Telephony Services](#)
Corporate Policy

Use of information technology assets

IQVIA provides a wide range of assets, including mobile devices, Internet access, computers and systems, and office equipment such as printers and copiers to help you work effectively. Appropriate use of such assets and systems is required. You must take reasonable steps to protect IQVIA's assets against theft and misuse. IQVIA's assets and systems are granted for use as a business tool and must be used productively and for business purposes. IQVIA-provided assets and systems must be used in compliance with applicable policies and procedures and may not be used to:

- Violate any IQVIA policy or procedure,
- Engage in illegal, fraudulent, or malicious conduct,
- View, send, receive, or store offensive, obscene, or defamatory materials,
- Harass other individuals, or
- Monitor or intercept files or electronic communications of any other individual or organization without prior authorization.

Occasional personal use of Company assets is permissible and should be kept at a minimum, unless such use:

- Interferes with your work responsibilities,

- Involves more than nominal use or cost
- Violates any IQVIA policy or procedure, or
- Circumvents security controls.

Do not assume that any information sent over Company systems is private. It may be seen or heard by someone other than the person receiving the message. IQVIA reserves the right to review any files, messages, or communications sent, received, or stored on IQVIA-provided systems or devices. IQVIA also reserves the right, in accordance with applicable laws and regulations, to take possession of any IQVIA-provided asset at any time. You may not install or download any software on a IQVIA computer or obtain access to IQVIA network through a commercial provider unless specifically authorized by IT support.

Driving and use of mobile devices

Use of mobile devices while driving is often prohibited by law. To ensure employee safety and legal compliance, IQVIA discourages any use of hand-held mobile devices while driving on Company business or using Company-provided cars.

Assets

Further guidance

[Business Records Management Corporate Policy](#)

[Legal Department](#)

[Protection of Physical and Intellectual Property \(non IT\) Corporate Policy](#)

Business records management

Effective management of Company records is essential to meet business needs and satisfy applicable legal requirements. Therefore, it is the policy of IQVIA that Company records are:

- Retained for as long as required by law, applicable record retentions policy, or applicable contract,
- Able to be located quickly and efficiently,
- Destroyed in accordance with applicable record retentions policy, and
- Protected from destruction when a “legal hold notice” has been issued.

In the event of litigation, investigation, audit, or examination initiated by IQVIA or any government agency, all documents must be retained that relate to the matter under review. Any employee who destroys, alters, or conceals a record or document, or attempts to do so, with the intent to impair its use or availability for use in an official proceeding could face discipline, legal action, or both.

Protecting our assets

Employees must actively participate in helping to ensure the protection of our tangible assets. Tangible assets are ones that have a physical form, such as office equipment and laboratory equipment. You must:

- Keep tangible assets within your control secure at all times. Employees who remove or transport tangible assets outside of Company facilities must return such assets to secured Company facilities as soon as possible.
- In instances of theft or damage of tangible assets, immediately report such incidents to the facility’s security operations and to your manager.



Q&A

Someone stole my laptop. What should I do?

Immediately report the theft to the IT Global Service Desk, local law enforcement, and the Legal Department or Privacy team (so they can assess whether personal or confidential customer data was on the laptop and whether it was encrypted). IQVIA tracks these incidents as part of our policy, and it is legally required in many locations.

Assets



Protecting our assets

As an industry leader in biopharmaceutical services and a global leader of information and technology services for the life sciences, IQVIA protects its intangible assets, including our brand name, reputation, and intellectual property (“IP”) to prevent key rights and knowledge from being diminished, stolen, or misused. IP rights are intangible creations of human intellect including, patents, trademarks, copyrights, service marks, trade secrets, know-how, database rights, moral rights, and proprietary technology.

It is our policy to identify, secure, and protect our own IP and to respect the IP rights of others.

To help protect IP you must:

- Identify all key innovation, advancements, and improvements that offer a competitive or commercial advantage, or create a market differentiation and ensure IP protection is secured, as may be necessary, including by identifying such IP to the Legal Department,
- Not use, copy, distribute, or change copyrighted or third-party materials, without permission from the copyright owner or its authorized agent, such as the Copyright Clearance Center,

- Use only properly licensed software, and Company-approved open-source software in connection with our business and comply with license terms that are required for such use,
- Properly acknowledge and use IQVIA's trademarks and follow the requirements of our brand resources,
- Keep the secrecy and promptly secure the protection of competitive and valuable innovations for which IQVIA will seek or is seeking patent or trade secret protection,
- Sign a work product agreement, or other similar agreement that states, in part, that any intellectual property created by you in the course of working for IQVIA belongs to IQVIA, and
- Comply with the corporate identity standards or brand guidelines, which contain the requirements for using the Company's existing brands, trademarks and service marks.

Corporate governance

IQVIA governs the enterprise in a responsible manner.

IQVIA is committed to a system of governance that helps to ensure corporate integrity. Our commitment to strong corporate governance balances the Company's obligations to and the interests of its patients, trial participants, employees, customers, investors, and regulators in support of our vision and values.



Corporate governance

Further guidance

[Corporate Policies: Development, Maintenance and Compliance](#)
Corporate Policy

Corporate policies

IQVIA develops and implements policies and procedures that help us comply with legal requirements and uphold ethical standards. You must comply with this Code and IQVIA's policies and procedures. You are expected to read and become familiar with this Code and the Corporate Policies. You are also expected to acknowledge this Code and the Corporate Policies, as assigned. Violation of the Code or a Corporate Policy or procedure can lead to disciplinary measures. Such measures may include termination of employment depending on the magnitude of the violation and in accordance with local employment laws.



Corporate governance

Further guidance

[Securities Trading](#)
Corporate Policy

[Regulation FD \(Fair Disclosure\)](#)
Corporate Policy

Securities trading

Unlawful insider trading occurs when a person purchases, sells, or otherwise trades the securities of a company (such as IQVIA stock) while in possession or aware of material non-public information of that company or provides that information to others who may trade while in possession or aware of that information. These actions violate IQVIA policy. The trading restrictions based on material non-public information apply no matter how you acquired the information. These restrictions still apply after the termination of your employment with IQVIA.

If you make such a disclosure of material non-public information, you can be punished even if you have no financial gain.

Material information

Information is considered “material” if a reasonable investor would consider that information important in making a decision to buy, hold, or sell securities. Any information that could reasonably be expected to affect a company’s stock price should be considered “material.” Examples include information regarding:

- Changes in earnings estimates,
- Major litigation,
- Government actions,
- Important personnel changes,
- Strategic plans,

- Major expansion or termination of operation,
- Potential acquisitions or divestitures, and
- The award or loss of a significant contract.

Other items may constitute Material Information. It depends on the circumstances.

Information that has not been disclosed to the public is generally considered to be “non-public” information.

You may not buy or sell IQVIA securities or publicly traded securities of any IQVIA subsidiary, affiliate, or investment while knowing material non-public information about that company. Also, you may not engage in any other action to take advantage of, or pass on to others, material non-public information. These requirements also apply to buying or selling securities of any other company while you have material non-public information about it that you learned in the course of your job, including public companies with which we are doing business or contemplating a major transaction.

The same restrictions apply to family members and others living in your household. You are responsible for their compliance regarding information they receive from you. These requirements apply to all IQVIA employees wherever they are located, even if the activity does not violate the law of the country where they live.

Corporate governance



Q&A

I overheard someone talking about the poor results of a client's clinical trial. My brother owns stock of that client. I think it is OK to tell him what I heard because I am not the one who will directly benefit. Am I correct?

No. Such information is Material Information and you must not disclose it to anyone before it becomes public.

An executive assistant typed an agreement that will allow a company to enter a very profitable new line of business. She told her sister-in-law who bought one thousand shares of the company's stock. The day after the news is released, the stock price goes up by two dollars per share. Does this violate the law?

Yes. The executive assistant violated the insider trading laws, even though she did not make a profit.

Our company is going to announce the withdrawal from the market of a new service that was recently introduced with much publicity, since it failed to draw customers as expected from our competitor's service. This may result in the competitor's stock price going up. Is it all right to buy the competitor's stock before the withdrawal is publicly announced?

No, because your decision to buy was based on non-public information. Remember, whether non-public information is material is often judged in hindsight, based on whether the stock price in fact moved up or down.

Isn't the Company imposing U.S. standards on employees in other countries?

Insider trading violates fundamental concepts of fairness that are a basic part of our values. Employees working outside the United States can be charged under U.S. laws for insider trading in U.S. securities. In addition, insider trading laws have become commonplace in many countries in which we do business. Some of those laws are even more punitive than those in the United States.



Corporate governance

Further guidance

[Financial Oversight, Controls and Reporting](#)
[Corporate Policy](#)

Corporate financial reporting

IQVIA is committed to corporate responsibility and accountability, and appropriate fiscal oversight, including accurate and timely financial reporting. We achieve these goals through Board-level governance policies and policies that apply to our business lines.

Many people rely upon the integrity of our business records, which are used to create reliable and accurate reports. We give these reports to management, customers, investors, governmental agencies, and others. IQVIA uses a system of internal accounting controls to help protect Company assets and help to ensure the accuracy of financial records and reports. You must follow all accounting policies and procedures, including expense reporting.

You must communicate openly and cooperate with IQVIA's internal and outside auditors. It is illegal to take any action to fraudulently influence, coerce, manipulate, or mislead any internal or outside auditor engaged in the performance of an audit of IQVIA's financial statements.

Financial transactions must be reported accurately, completely, and fairly. They must be completed on time and in an understandable way. The data we give to create financial statements, regulatory reports, and publicly-filed documents must meet with all applicable accepted accounting principles. It also must meet our internal control procedures.

It is your responsibility to report any unrecorded funds or assets, or false or artificial entries, that you become aware of in the Company's books and records. If you learn or suspect accounting fraud, report it immediately to the General Counsel.



Q&A

My manager asked me to report that my sales calls took place on Thursday and not Friday, when they occurred. Friday was the start of a new quarter, and I suspect that my manager wants it to appear we met last quarter's sales targets. How should I proceed?

We must account for all services in the period in which they occurred. Your manager is asking you to create an inaccurate record. You should not follow this instruction. You should report the situation to a senior manager, Internal Audit, or the Ethics Line.

I am a secretary and have been asked to fill out an expense report for my supervisor. I know that his wife accompanied him on the trip for purely personal reasons, and that he has included his wife's expenses in the report without approval of higher management, although you can't tell from the invoices. What should I do?

Ask him if he inadvertently included his wife's expenses. If you know an expense report as submitted is fraudulent, you must report it to your supervisor's manager, the Legal Department, or the Ethics Line.

Corporate governance

Further guidance

[Legal Matters](#)
Corporate Policy

“Legal Privileges” includes the attorney-client privilege, attorney work product doctrine, and other such privileges and protections.

[Sustainability and Citizenship](#)
Corporate Policy

Legal matters

The Legal Department is responsible for providing or seeking quality legal services for all legal matters globally for IQVIA. In addition, the Legal Department oversees processes to help ensure IQVIA's compliance with all laws and regulations, and helps to protect Legal Privileges, as applicable.

The Legal Department must approve, in writing, the engagement of outside legal counsel for all subject matters and across all business units. No employee is authorized to engage outside legal counsel without such written approval. The only exception to this rule is that in very limited circumstances, the Ethics and Compliance Office may retain outside counsel for compliance-related matters.

IQVIA, like any large company, may become involved in legal disputes. You must promptly contact the Legal Department if you receive a legal document or other communication about IQVIA such as a subpoena, summons, demand letter from a customer, or communication from an attorney. Never threaten or begin legal action for IQVIA without the consent of the Legal Department.

Sustainability and citizenship

IQVIA is committed to supporting sustainable business practices and acting as a good corporate citizen — running our business in a socially responsible way that helps create long-term value. IQVIA demonstrates this commitment by adopting policies and practices in specific areas related to sustainable development, including environmental, health, and safety; corporate social giving; supporting the human rights of workers; and ethical business practices. IQVIA opposes unethical practices, such as child labor and human trafficking.

IQVIA's sustainability and citizenship program centers on three core focus areas:

- **Planet:** Making a positive impact on the environments in which we work.
- **People:** Creating a workplace of highly engaged, safe, and healthy employees.
- **Public:** Engaging consistently and transparently in a manner that inspires participation and demonstrates leadership in sustainability.

There are many ways each of us can support this commitment. Suggestions include reducing solid wastes by utilizing recycling bins and adopting two-sided printing, reducing energy consumption by carpooling, or turning off your computer each day.

Addressing particular situations / challenges

Further guidance

If you become aware of activities that are not consistent with the standards set forth in ***Doing the Right Thing***:

Try to resolve your concern with your manager, another manager, or your Human Resources representative.

If resolution through such channels is not suitable or if you have already taken this step and feel the issue was not resolved, contact the Ethics Line.

Red flags

Using or hearing the following, or similar, phrases may mean that a questionable activity has occurred or may be taking place.

"Everyone does it."

"No one will ever know."

"I'll never do this again."

"We'll do whatever you want if you'll give us your business."

"We didn't have this conversation."

"Just make sure no one sees that document again."

"The ends justify the means."

Consider the alternatives

When faced with a decision that might involve you or others in questionable activities, stop and think. If you are not sure about a particular situation, ask yourself the following questions.

"Are my actions legal?"

"What will I think about myself afterwards?"

"What would my family or friends think about what I was doing?"

"How would it look in a newspaper article or on TV?"

"Are there any alternatives to my actions?"

If you know it is wrong — do not do it.

If you are still not sure — ask for guidance.

Raising concerns

For more information on topics in *Doing the Right Thing* or to discuss an area of concern, contact one of the resources listed in this Code or in this section.

We each have an obligation to act ethically and help protect the integrity and reputation of IQVIA. You must raise perceived violations of our standards where the interest of IQVIA or the physical safety of people or assets are at stake.

As a first step, you should seek out local management or resources for help in addressing concerns. Alternatively, you may contact the Ethics Line or any of the resources listed in this Code.

IQVIA has a non-retaliation policy, making it safe for you to raise concerns. However, anyone who knowingly makes a false accusation or knowingly gives false information may be subject to disciplinary action.

We treat all communications seriously and with courtesy and discretion. Issues will be appropriately investigated and needed corrective action taken.

Help and information



Local resources

- Your manager or another manager
- Your Human Resources representative
- A member of the local leadership team
- Local member of the Legal Department, the Ethics and Compliance Office, or Internal Audit

Global resources

IQVIA Ethics Line

The Ethics Line is available 24 hours a day, 7 days a week. It is operated by a third-party vendor. You may dial the toll-free number for the Ethics Line or file a report online. Translation services are available upon request if you are more comfortable speaking in a language other than English.

Use the Ethics Line or the Ethics Line website to:

- Request guidance about our standards for ethical business conduct,
- Report a concern related to those standards, or
- Get help in decision-making when facing an ethical concern.

Where permitted you may remain anonymous, although you are encouraged to identify yourself. An outside service provider operates the Ethics Line and hosts the Ethics Line website.

Ethics Line Phone Numbers

Inside the U.S. — 1 866-738-4427

Outside the U.S. — Check with the Ethics and Compliance Office or the Ethics Line Website for your country's toll-free number.

Dial that number and dialing instructions.

To access the Ethics Line Website: [IQVIAethics.com](https://www.IQVIAethics.com)

Ethics and Compliance Office

The Ethics and Compliance Office is a corporate resource available to answer questions, provide guidance or help address concerns relating to the standards set forth in *Doing the Right Thing*.

Contacts may be made to the following dedicated email address:

business.ethics@IQVIA.com

Email sent to this account goes directly to the staff of the Ethics and Compliance Office. This communication method does not have the capacity of anonymity.

The Legal Department

The Legal Department can be reached through:

officeofgeneralcounsel@IQVIA.com

Help and information

Note

Limits on contacts from Europe

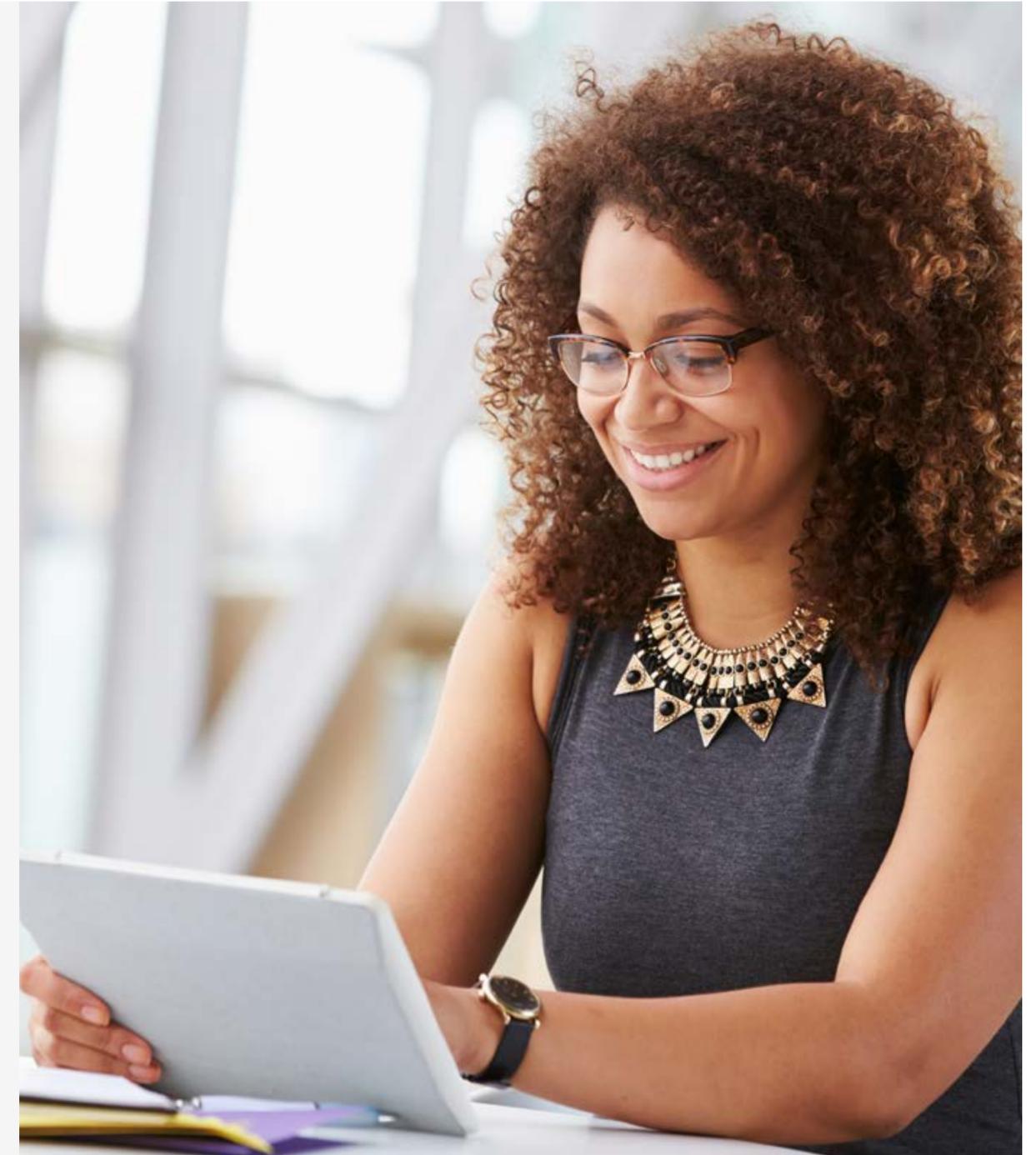
Due to certain regulations, the types of matters the Ethics and Compliance Office or the Ethics Line may process may be limited to certain matters.

In situations where the Ethics Line use is limited, European employees should address other concerns to their local resources such as employee representatives or Human Resources.

Call handling

The Ethics and Compliance Office receives all reports made to the Ethics Line, whether by phone or via the intranet. The Ethics and Compliance Office holds and uses personal information in accordance with IQVIA data privacy policies and data privacy laws.

Where permitted by law, you are not required to identify yourself. If you choose not to give your name, our ability to investigate the matter may be impaired and we may not be able to address your concerns thoroughly.





Conclusion

We each have an obligation to practice good business ethics. This Code cannot cover all the rules and regulations that apply to every situation. However, the values and requirements summarized here can help you make the right decision. Each of us is expected to behave ethically even in the absence of a specific company policy. Our reputation and continued success depend on the decisions you make every day.

We are each responsible for our own actions. No illegal or unethical act can be justified by claiming that higher management or a client ordered it. You always have resources to contact for assistance such as those listed in this Code and the “Help and Information” section.

Violation of any of our standards or policies may result in disciplinary action that could include dismissal and / or legal action.

Do your part. Do the right thing.

[CONTACT US](https://www.iqvia.com/contactus)
[iqvia.com/contactus](https://www.iqvia.com/contactus)

This document may change from time to time. Any waiver of this Code for an executive officer may only be made by the Board of Directors. To review the most current version, visit www.IQVIA.com or email the Ethics and Compliance Office for a copy at: business.ethics@iqvia.com

If you are unable to access any information in this Code provided via “links”, email the Ethics and Compliance Office for assistance at business.ethics@iqvia.com

This Code of Conduct is not an employment contract between IQVIA and its employees. Violation of any of our standards or policies may result in disciplinary action that could include dismissal and/or legal action.

Other IQVIA materials, such as policies, employee handbooks, or employment contracts and agreements, may cover some of the responsibilities discussed in this Code in more detail. More restrictive standards may also apply in local offices. If there is a conflict between standards, the more restrictive standard applies.

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