

# Labcorp Code of Conduct and Ethics

A guide to help us make the right choices and smart  
decisions consistent with ethical standards

**labcorp**

# Table of Contents

3	Letter from Adam Schechter		
4	Labcorp's Mission	16	
4	Compliance Program Guiding Principles	16	
5	Introduction	17	
	<b>Ownership</b>		
7	Who Does the Code Apply To?	18	
7	Your Role	19	
8	Special Responsibilities as a People Leader	20	
8	Ethical Decision-Making Guide	21	
	<b>Courage</b>		
10	What Do I Do If I Know About or Suspect a Violation of the Code?	21	
10	How Do I Report a Violation?	21	
11	What Happens When I Report?	21	
11	No Retaliation	22	
	<b>Teamwork</b>		
13	Equal Opportunity Employment		
13	No Discrimination or Harassment		
14	Substance Abuse and Treatment		
14	Background and Exclusion Checks		
14	Anti-Violence		
	<b>Excellence</b>		
	Business Partners with Shared Values		
	Fair Competition and Fair Dealing		
	Gifts, Meals and Entertainment		
	Privacy, Information Protection and Security		
	Conflicts of Interest		
	External Communication and Social Media		
	Protection and Proper Use of Labcorp Assets		
	Intellectual Property		
	No False and Fraudulent Claims		
	Financial Integrity, Record Keeping and Retention		
	<b>Integrity</b>		
	Securities Regulation – Insider Trading		
	Securities Regulation – Rules for Principal Executive Officer and Senior Financial Officer		
	Preventing Bribery, Corruption and Improper Influence		
	Quality		
	Trade Compliance		
	<b>Inspiration</b>		
	Human Rights		
	Public Service and Political Contributions		
	Environment, Health and Safety		
	Waivers of or Changes in The Code of Conduct and Ethics		
	Administration		
	Contacts and Resources		



“Our unwavering commitment to operating with the highest ethics and integrity is foundational to delivering on our mission.”

Dear colleagues,

Our unwavering commitment to operating with the highest level of ethics and integrity is foundational to delivering on our mission to improve health and improve lives around the world.

Our Code of Conduct and Ethics guides our decisions and actions as we work together to help solve society’s most critical health challenges. Each of us has a responsibility to prioritize, adopt and adhere to our Code of Conduct by following these essential steps:

- Read, understand and adopt the principles in our Code of Conduct and Ethics
- Refer to it regularly to refresh your knowledge
- Comply with the standards in the Code of Conduct and Ethics and with associated policies and procedures
- Ask questions, express concerns and speak up

As a global leader of innovative and comprehensive laboratory services, Labcorp’s success is built on the trust we earn by doing the right thing. Thank you for your commitment to strengthening Labcorp’s culture and operating with the highest ethics and integrity toward each other as well as our patients, customers, shareholders and the communities we serve.

Sincerely,

A handwritten signature in white ink that reads "Adam". The signature is fluid and cursive, written in a professional style.

Adam Schechter  
Chairman and CEO of Labcorp

# Labcorp's Mission

To improve health and improve lives by delivering world-class diagnostics, bringing innovative medicines to patients faster and using technology to improve the delivery of care.

## Compliance Program Guiding Principles



Ownership



Courage



Teamwork



Excellence



Integrity



Inspiration

# Introduction

Labcorp holds itself to the highest ethical standards and expects you to read, understand and abide by those standards and this Code. This Code of Conduct and Ethics (Code) is not simply a list of rules; it is a statement of our fundamental values, intended to serve as a guide to help us make the right choices and decisions consistent with the highest ethical standards. This Code serves as a roadmap incorporating our values into the decisions we each make every day.

Labcorp uses cutting-edge science, technology and innovation to help doctors, hospitals, pharmaceutical companies, researchers and patients make clear and confident decisions. We know our work matters and we strive to attain ethical excellence. Labcorp is a global leader of innovative and comprehensive laboratory services with more than 67,000 employees serving customers across the globe. Labcorp is diverse in thought, customs, people and cultures. We strive to work openly and collaboratively to share knowledge and accomplish Labcorp's mission.

Labcorp is committed to uncompromising integrity in all that we do and in how we relate to each other, our customers, our suppliers and vendors, and to the communities in which we operate and provide services. You should seek advice from your leadership, the Law or Compliance Department, or other appropriate personnel if you have questions about specific laws, rules or regulations.

Obedying the law is one of the foundations on which Labcorp's ethical principles are built. Each of us must respect and obey the governmental laws, rules and regulations of the cities, states and countries in which we operate.

This Code **(1)** promotes honest and ethical conduct, **(2)** addresses compliance with applicable governmental laws, rules, and regulations, **(3)** deters wrongdoing, and **(4)** fosters full, fair, accurate and timely disclosure of concerns or violations. Everyone at Labcorp has a duty to follow this Code and to promote a culture of integrity and compliance.



## What do I do if the Labcorp Code of Conduct and Ethics is stricter than the local law, practice or custom?

You must comply with the Labcorp Code of Conduct and Ethics.

## What do I do if the local law has stricter requirements than the Labcorp Code of Conduct and Ethics?

You must comply with the law, local practice or custom.

**If you have questions about possible conflicts, please ask your people leader, Law Department or Corporate Compliance Department.**



# Ownership



- 7 Who Does the Code Apply To?
- 7 Your Role
- 8 Special Responsibilities as a People Leader
- 8 Ethical Decision-Making Guide



# Expectations of Individuals Under the Code

## Who Does the Code Apply To?

Unless explicitly excepted from a section, the Code applies to all Labcorp employees, officers, directors, agents, representatives, consultants, vendors and contractors. Each of us is required to read, understand and follow all relevant Labcorp policies and procedures and this Code. Compliance is everyone's responsibility.

## Your Role

This Code, together with Labcorp's policies and procedures, provides information you need to perform your job ethically and in line with applicable laws and regulations.



## Strive to do what is right

The Code cannot account for all scenarios; some may be unclear. You must use good judgment. If you observe or are asked to do something that makes you uncomfortable, seems improper, unlawful, or contrary to Labcorp policies or procedures, speak to the appropriate group, as discussed later in this Code.

## Seek guidance and ask questions

If something does not seem right, ask your people leader, senior leadership, or the Law or Corporate Compliance Department to clarify.

## Report any concerns or violations

If you have observed or are concerned about any possible violations of this Code or any laws or regulations, you have a duty to report this potential violation as discussed later in this Code.

## Take inquiries and/or investigations seriously

Whether your daily responsibilities involve investigating potential violations or you are asked to participate in a particular inquiry or investigation, you must cooperate fully and to the best of your ability.

## Do not retaliate against anyone reporting a concern or violation

Labcorp prohibits retaliation of any form (whether by a people leader, coworker or anyone else) against someone who has made a good faith report of a suspected violation of this Code, Labcorp policy or applicable law or regulation.

This Code is a guide for overall conduct in our global operations. It is not a substitute for the detailed guidance provided in Labcorp's Business Practices Manual, HIPAA Privacy and Security Manual, Human Resources policies, or other specific Company policies. You should consult with the Corporate Compliance Department and the Business Practices Manual for further guidance and discussion of many of the topics addressed in this Code. Look to any specific policies of Labcorp's various subsidiaries for guidance on specific topics and activities relevant to your responsibilities.

**Those who violate this Code will be subject to disciplinary action as Labcorp deems appropriate, up to and including termination from Labcorp, and, potentially, civil liability and criminal prosecution.**

**If you are in a situation that you believe may violate or lead to a violation of this Code, you must report the situation according to the procedures discussed in this Code.**



## Special Responsibilities as a People Leader

As a people leader, you are highly visible and influential. Your behavior and actions matter to employees and impact their performance and engagement. You are expected to:

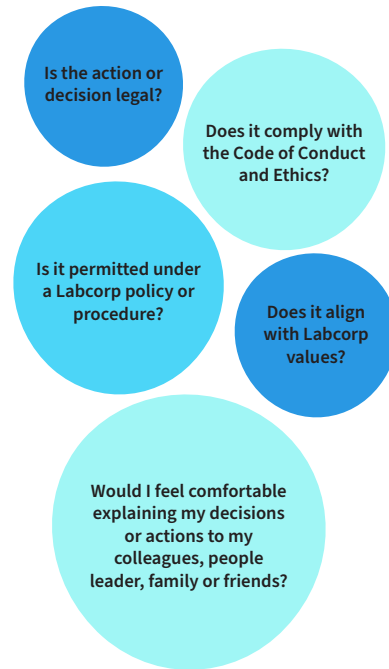
- Model ethical conduct including the standards in this Code
- Communicate the importance of this Code to employees and make sure they understand their responsibilities
- Create an environment where employees are comfortable asking questions and are supported when speaking up
- Respond promptly and properly to employees who raise concerns or seek advice
- Promptly report potential misconduct and escalate or investigate any reports made to you as appropriate
- Not retaliate or condone retaliation against anyone for sharing concerns in good faith or supporting an investigation
- Verify employees complete required training

### Ethical Decision Making

For the Code to work most effectively, it is important to ask questions and voice concerns. Labcorp's "open door" practice gives you the freedom to approach any member of management with questions or concerns about ethics or compliance without fear of retaliation. We must all work to take prompt and consistent action against violations of this Code or applicable law. Because the Code cannot address every situation that will arise, it is important that we have a way to approach a new question or concern. Please consider the following:

- **Use your judgment and common sense.** If something makes you uncomfortable, seems unlawful, unethical, or improper, do not do it.
- **Discuss the situation with your people leader or other appropriate personnel.** This is the basic guidance for all situations. In many cases, your people leader will be more knowledgeable about the question and will appreciate being brought into the decision-making process. If you are uncomfortable speaking with your people leader, please speak to other appropriate leadership.
- **Seek help from corporate resources.** In the event you do not feel comfortable approaching your people leader with your question, or you have done so but still have a concern, discuss it with your Corporate Compliance Department representative, the Law Department or your Human Resources representative.
- **Always ask first, act later.** If you are unsure of what to do or are uncomfortable in any situation, seek guidance before you act. Ask questions.

If you are unsure of “the right thing to do”, before you act, ask these questions to guide you through the difficult situation:



If your answer to any of these questions is no, please reconsider your actions and seek guidance to help make the right decision.

### For More Information

**Corporate Compliance Department** — can provide guidance on the Code, compliance policies, how we comply with the laws, regulations, and industry standards.

**People Leaders and Senior Leadership** — can offer advice on how the Code pertains to your particular role at Labcorp.

**Law Department** — can advise on how Labcorp can conduct its business in compliance with applicable laws and contractual obligations.

**Human Resources** — can explain and answer questions related to benefits, employment and workplace issues.



# Courage



- 10 What Do I Do If I Know About or Suspect a Violation of the Code?
- 10 How Do I Report a Violation?
- 11 What Happens When I Report?
- 11 No Retaliation



# Speak Up

## What Do I Do If I Know About or Suspect a Violation of the Code?

If you suspect a violation of any laws, rules, regulations or this Code has occurred, you must proactively and promptly report it. When in doubt about the best course of action in a particular situation, you should report the concern. Failure to report a potential violation may be cause for discipline.

## How Do I Report a Violation?

You may report a suspected violation or other concern via any of the following methods:

- Speak with your people leader
- Connect with Human Resources through HR Central
- Contact the Law Department, the Corporate Compliance Department or Corporate Internal Audit
- Speak with anyone else on the management team
- Call or report through the online portal for the Labcorp Action Line

Any people leader who receives a report of violation or potential violation of this Code or law must report it immediately to the Chief Legal Officer or the Corporate Compliance Department. Reports related to accounting, internal accounting controls, or auditing matters will be forwarded to the Internal Audit Department.

Labcorp has established the Labcorp Action Line which can be used to ask questions or to report suspected or actual unlawful or unethical behavior or violations of law, rules, or regulations or of this Code or internal policies. You can reach the Labcorp Action Line 24 hours a day, seven days a week, in your preferred language by reporting online at [Labcorp.ethicspoint.com](http://Labcorp.ethicspoint.com), or via phone using one of the numbers listed on the online portal.



## I want to report a concern, but I don't feel like I have all the information. What should I do?

You must report your good faith concern. You are not responsible to gather all the facts. If you know or suspect of an event that may be inconsistent with the Code, Labcorp policies or the law, you must speak up!

Reports may be made anonymously via the Labcorp Action Line, where permitted, but we encourage you to provide your name and a thorough description of your specific concern to facilitate the investigation. Whether or not you provide your name, all information will be kept confidential except to the extent required to inform individuals involved in the investigation of the complaint.

Employees are expected to cooperate in internal investigations of alleged misconduct. Any person involved in an investigation of possible misconduct in any capacity must not discuss or disclose any information to anyone outside of the investigation unless required by law or when seeking own legal advice.



## People Leader Tip

People leaders have a responsibility to address employee concerns, including listening, discussing, escalating to the appropriate corporate resource and taking prompt action to resolve any such matter.

- Confirm the matter is reported or report it yourself
- Maintain confidentiality
- Do not conduct an investigation unless directed to by the Corporate Compliance, Law Department or Human Resources
- Connect with the appropriate resources if you need guidance
- Encourage cooperation with an investigator
- Avoid making representations about the outcome of the investigation

## For More Information

[Action Line Policy \(BPM-10\)](#)

[Whistleblowing Policy – France \(BPM-10.1\)](#)



## What Happens When I Report?



## No Retaliation

**Labcorp prohibits retaliation in any form.** Retaliation includes any adverse employment action taken against an employee as a means of punishing or seeking retribution against an employee for (a) raising a good faith concern about a potential violation of applicable law, regulation, this Code or other Company policy (b) participating as a witness in an external or internal investigation regarding a potential violation of policy or law, or (c) being associated with a person who has raised a good faith complaint or participated in an investigation. Good faith means having an honest or reasonable belief in the facts being reported and not acting maliciously.



### People Leader Tip

As a people leader, you must demonstrate commitment to a retaliation-free workplace. Never engage in retaliation, and prohibit retaliation against others. Know the actions that are considered retaliation and avoid them. Examples include but are not limited to:

- Demotion
- Suspension
- Termination
- Failing to hire or consider for hire or promotion
- Giving negative performance evaluations based on unsubstantiated performance issues
- Failing to give equal consideration in making employment decisions or to make impartial employment recommendations
- Adversely impacting working conditions or otherwise denying any employment benefit to an employee
- Creating a hostile or intimidating work environment

### For More Information

Conducting Internal Investigations Policy (BPM-13)

# Teamwork



- 13 Equal Opportunity Employment
- 13 No Discrimination or Harassment
- 14 Substance Abuse and Treatment
- 14 Background and Exclusion Checks
- 14 Anti-Violence



# Respect for Each Other

## Equal Opportunity Employment

Our diversity is a tremendous asset. We are firmly committed to providing equal opportunity in all aspects of employment and to the principles of inclusion and respect. We do not tolerate or condone acts of discrimination, harassment or bullying on the basis of an individual's race, religion, color, national origin, age, gender (including pregnancy or other medical conditions/needs), family or parental status, marital, civil union or domestic partnership status, sexual orientation, gender expression, personal appearance, veteran status, disability, genetic information or any other legally protected characteristic (hereafter collectively referred to as "Protected Status").

## No Discrimination or Harassment

Labcorp will not tolerate any unlawful discrimination, harassment or retaliation of any kind.

- Discrimination is defined as any action or decision which affects the terms and conditions of an individual's employment—such as job applicant selection, hiring, promotions, job assignment, compensation, benefits, corrective action, layoffs, redundancies, furloughs or terminations—on the basis of an individual's Protected Status.
- Harassment involves any unwelcomed act or series of acts that are based on an individual's Protected Status where **(1)** enduring the offensive conduct becomes a condition of continued employment, or **(2)** the conduct is severe or pervasive enough to create a work environment that a reasonable person would consider intimidating, hostile or abusive.

Harassment and hostile environments can be created by unwelcomed or derogatory comments, slurs, derogatory gestures, jokes, displays of objectionable objects, photographs, cartoons, calendars or posters pertaining to an individual's Protected Status. For example, sexual harassment occurs from unwelcome or unwanted sexual advances, requests for sexual favors or other verbal or non-verbal conduct of a sexual nature that is sufficiently severe or pervasive as to alter the victim's employment and create an intimidating, hostile or offensive work environment.

**Labcorp does not tolerate harassment or the creation of a hostile work environment from anyone—a coworker, people leader, vendor, supplier, customer or patient.**



**Recently I overheard my people leader make an inappropriate comment about another employee that made me uncomfortable. I would usually talk to my people leader about a situation like this, but because they are the source of the concern, what should I do?**

It is understandable that you would be uncomfortable approaching your people leader, but you should report the situation so that it can be reviewed and appropriate actions taken. You may reach out to Human Resources or report through the Labcorp Action Line.

If you believe you are being harassed, or if you have witnessed harassment of a colleague, you need to report this to your people leader, or appropriate personnel, or Human Resources. Refer to the "How Do I Report A Violation" section for reporting options.

## For More Information

These policies are available via [HR Central](#):

Enterprise Global Non-Discrimination and Anti-Harassment Policy

Enterprise US Anti-Harassment



### Substance Abuse and Treatment

Your health and safety are paramount. Working under the influence of drugs or alcohol may pose an unacceptable risk to yourself and others. We therefore prohibit:

- Working under the influence of alcohol, illegal drugs or controlled substances on or off Labcorp premises
- Possessing, selling, using, transferring or distributing illegal drugs or controlled substances while working on Labcorp premises
- Working while impaired by a lawful prescription medication or over-the-counter drug

If you have a drug or alcohol problem, you are encouraged to seek assistance. Contact Human Resources to learn of available assistance programs.

Details regarding our drug testing policy are found in the Employment Policies Manual managed by Human Resources.

### Background and Exclusion Checks

You may be subject to background and exclusion checks prior to hiring or placement and periodically thereafter as allowed or required by law. You must immediately disclose any sanction or exclusion or other event (like loss of licensure) that makes you ineligible from participation in any government-funded program or contract. Any person who is excluded from or sanctioned under a government-funded program or contract or who loses a necessary license, is ineligible for continued service and will be subject to immediate termination. Labcorp's vendors and suppliers are subject to additional scrutiny, as permitted by law, and under the requirements set forth in the [Labcorp Supplier Code of Conduct](#).

### Anti-Violence

Labcorp has a zero-tolerance policy for workplace violence. You are prohibited from engaging in any act that could cause another individual to feel threatened or unsafe. This includes verbal assaults, threats or any expressions of hostility, intimidation, aggression or hazing.

Labcorp also prohibits the possession of weapons in the workplace. To the full extent permitted by local law, this prohibition extends to Company parking lots as well as our facilities. Our zero-tolerance policy for workplace violence applies to behavior on Company premises, as well as to your behavior when engaged in Labcorp business anywhere in the world outside of our premises.

Don't delay – speak up and report threats or potential violence immediately to local management.



**“Our zero-tolerance policy for workplace violence applies to behavior on Company premises, as well as to your behavior when engaged in Labcorp business anywhere in the world outside of our premises.”**

#### For More Information

[Exclusions Check and Ineligible Party Screening Policy \(BPM-03\)](#)

Enterprise Conditions of Employment Policy available via [HR Central](#)

# Excellence



- 16 Business Partners with Shared Values
- 16 Fair Competition and Fair Dealing
- 17 Gifts, Meals and Entertainment
- 18 Privacy, Information Protection and Security
- 19 Conflicts of Interest
- 20 External Communication and Social Media
- 21 Protection and Proper Use of Labcorp Assets
- 21 Intellectual Property
- 21 No False and Fraudulent Claims
- 22 Financial Integrity, Record Keeping and Retention



# The Way We Do Business

## Business Partners with Shared Values

We count on reliable and ethical business partners to bring the best value to patients, clients and stakeholders. Our business partners' actions reflect on Labcorp's reputation. It is important we select business partners who share our values. Labcorp requires third parties to complete the Third Party Risk Management process to verify our partners have policies and procedures that align with Labcorp's own guiding principles.

## Fair Competition and Fair Dealing

We compete fairly and honestly. Labcorp complies with all applicable antitrust and competition laws. We seek competitive advantages through superior performance, never through unethical or unlawful business practices. You should be particularly aware of these laws and Labcorp policies before attending any meeting, conference, trade association function, or any other event to be attended by competitors or likely to foster communication with competitors.

Stealing proprietary information, possessing trade secret information that was obtained without the owner's consent, or encouraging past or present employees of other companies to tell you trade secrets is prohibited. You must respect the rights of, and deal fairly with, Labcorp's customers, suppliers, competitors and their affiliates and employees.

### Examples of Anti-Competitive Behavior:

- Price Fixing – agreeing with competitors to raise, lower, maintain or stabilize prices
- Collusion – agreeing to cooperate with another party to gain competitive advantage
- Bid-rigging – agreeing with competitors, in advance, which company will win the bid

## Do's and Do not's when engaging with competitors

### DO:

- Consult the Law Department or Corporate Compliance Department before attending meetings where sharing confidential information with competitors may occur
- Respond appropriately to competitive bids to win business
- Obtain competitive information from publicly available sources, like websites, publications or other public marketing materials

### DO NOT:

- Discuss limiting competition, such as:
  - Past, present, future pricing schemes
  - Dividing territories, customers or markets
  - Refusing to bid
  - Restricting or limiting growth or capacity
- Ask for confidential information from competitors or former employees of competitors
- Use or disclose confidential information of your former employers as part of your job at Labcorp

### For More Information

Enterprise Third Party Risk Management Policy (BPM-24)





## Gifts, Meals and Entertainment

Ethical relationships with clients and vendors are critical to supporting Labcorp's mission. Occasional meals and business courtesies can help facilitate legitimate scientific and educational discussions about Labcorp's products and services. However, Labcorp may not give or receive gifts, meals, entertainment, recreation or other valuable items in a manner that could improperly influence a clinical or business decision. In the U.S., federal and state laws limit what Labcorp can provide to healthcare professionals that refer patients for diagnostic testing at our laboratories. When interacting with clients and third parties, Labcorp must abide by the guidelines and restrictions for providing and receiving gifts, meals and entertainment found in our Labcorp Client and Third Party Expenses Policy, as well as follow all applicable laws and regulations.

### Courtesies and gifts may be accepted if:

- It is related to a legitimate business purpose
- It is not cash or a cash equivalent (i.e., gift card)
- It is not requested or offered in exchange for making a business or procurement decision
- It is offered in an open and transparent way (i.e., not hidden or disguised)
- It is modest in value



### People Leader Tip

#### **A client wants to reward your employees with a gift card for working efficiently and effectively on its project. What should you do?**

People leaders should look to internal employee recognition measures to reward Labcorp employees for extra efforts when they provide successful deliverables to a client.

If the client is insistent, a people leader should consider **(1)** whether accepting the gift would create a conflict of interest, **(2)** whether the gift is of nominal value if it is divided by the total employee population who may receive a portion of the gift, and **(3)** whether there are any tax implications if the employee is given the "gift."



### **I want to take a physician out to lunch to discuss a new diagnostic test. Is this allowed?**

Labcorp may provide modest meals to physicians and other clients to help facilitate legitimate business meetings and presentations. You should make sure the meal takes place in an appropriate setting, such as a conference room in the physician's office, and only invite participants who have a reason to attend based on the information being presented. If the client is a U.S. physician, you must also follow Labcorp annual spending limits and track the value of the meal in accordance with the Client and Third Party Expenses Policy (BPM-08).

### **For More Information**

[Client and Third Party Expenses Policy \(BPM-08\)](#)  
[Anti-Bribery and Anti-Corruption Policy \(BPM-05\)](#)  
[Labcorp Travel and Entertainment Policy](#)  
[Labcorp Purchasing Card Policy](#)  
[Labcorp Diagnostics Compliance Policies \(Section 2, BPM-LCD\)](#)



## Privacy, Information Protection and Security

Labcorp respects the privacy rights of those with whom we work, including patients, study participants, employees, clients and vendors. Protecting the privacy and security of patient information is of utmost importance to Labcorp's business and key to maintaining the trust of patients, study participants and clients.

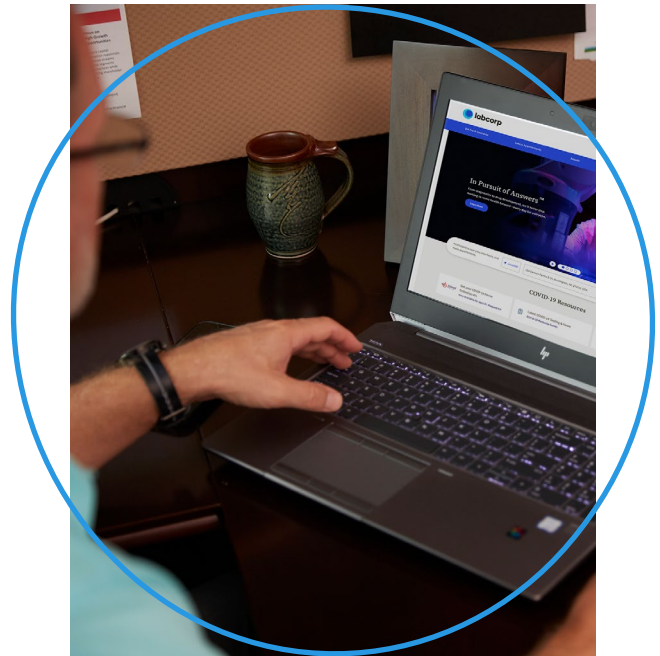
Labcorp requires that you treat all personal information (including but not limited to that of patients, study participants and employees) with the strictest confidentiality in accordance with contractual commitments, ethical standards and all applicable laws in the jurisdictions in which we do business including but not limited to the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and the European Union General Data Protection Regulation (GDPR).

All personal information maintained by Labcorp is collected, processed, stored and transferred with adequate precautions and safeguards to maintain confidentiality. You may access personal information of others only with specific authorization, for an authorized and permissible purpose, and only the minimum amount of personal information necessary for that purpose may be accessed, used, and/or disclosed. Any access, use or disclosure not specifically authorized is strictly prohibited.

You are required to protect the security of any personal information over which you have control or access. You are required to know, understand and follow all information security policies and rules for the disclosure, transfer and maintenance of personal information.

You must immediately report to the Labcorp Privacy Office, or the Office of Information Security (OIS), any incident that may involve the unauthorized access to, or use or disclosure of, personal information, as well as any unavailability of systems or applications that maintain personal information.

Employees, officers and directors must maintain the confidentiality of information, including non-personal information related to the Company's business practices, entrusted to them by Labcorp or its customers, except when Labcorp's Chief Legal Officer or Law Department authorizes disclosure or such disclosure is required by law. Confidential information includes all non-public information that might be of use to competitors or harmful to Labcorp or its customers if disclosed. It also includes information that suppliers and customers have entrusted to us. The obligation to preserve confidential information continues even after employment with Labcorp ends.



### For More Information

[Privacy Policy \(BPM-19\)](#)

[Office of Information Security](#)

[HIPAA Privacy and Security Policies Manual](#)

[Critical Hotlines](#)



## Conflicts of Interest

Any potential or actual conflict of interest—or even the appearance of such a conflict—must be avoided.

A conflict of interest occurs when a person's private interest actually or potentially interferes in any way (or even appears to interfere) with the interests of Labcorp, such that it may be or appear to be difficult for that person to perform their Labcorp work objectively and effectively. Conflicts of interest may not always be clear-cut, so if you have a question, or you believe a certain conflict of interest is unavoidable, you should consult with your people leader, or other appropriate personnel, the Corporate Compliance Department, Law Department or Human Resources.

### Areas of possible conflict of interest include, but are not limited to, the following:

1. Outside employment and directorships
2. Significant investments in any competitor, customer, distributor or supplier
3. Use of Labcorp's time and assets for personal benefit
4. Accepting gifts and entertainment
5. Directly or indirectly supervising, or negotiating with, family members and others with whom you have a close personal relationship
6. Taking potential Labcorp business opportunities for personal gain

Officers and employees must notify the Labcorp Global Government Relations and Public Policy Department and obtain approval from the Corporate Compliance Department before seeking or accepting a nomination or appointment to any public office, whether paid or unpaid, to confirm that such participation does not conflict with the officer's or employee's professional responsibilities.



### People Leader Tip

#### What do I do when an employee reports a potential conflict of interest to me?

- Refer to the Conflicts of Interest Policy (BPM-17)
- Gather all necessary information, including:
  - Does the opportunity involve a potential or current client, vendor, supplier or competitor?
  - Is the opportunity paid?
  - Does the opportunity take potential Labcorp business?
- Escalate the request to the Corporate Compliance Department, if necessary



### How do I identify a Conflict of Interest?

#### Ask:

- Am I using a Company resource for my own benefit?
- Do I have a relationship that may appear to impact decisions I make for Labcorp?
- Do I have an ownership stake in a business working with or competing with the Company?
- Would someone question my judgment based on something I'm doing outside of work or a relationship I have?

### For More Information

[Conflict of Interest Policy \(BPM-17\)](#)



## External Communication and Social Media

**Media:** If you are contacted and asked to discuss Labcorp business with any members of the media, investors or market analysts, do not provide any information. Instead, politely advise the outside party that you are not authorized to discuss the subject and refer them to the spokespeople designated in our Media Inquiries and Press Release Policy.

**Social Media:** Social media, like Facebook, Instagram and LinkedIn, is an integral part of our personal and professional lives. It is appropriate to celebrate and discuss Labcorp while protecting the privacy, safety and dignity of friends, clients and coworkers. You may not post sensitive, proprietary, confidential or unpublished financial information about Labcorp, or any Protected Health Information (PHI) on social networking sites and blogs. Communicating confidential and/or proprietary information about Labcorp or PHI is prohibited and is grounds for immediate termination. This prohibition does not apply to discussions regarding the terms and conditions of employment.

You may not use social networking to promote or advertise on behalf of Labcorp or its subsidiaries without appropriate Labcorp approval. Federal Trade Commission regulations apply to publishing promotional content online including content designed to endorse, promote, sell, advertise or otherwise support Labcorp and its products and services. Therefore, if you engage in such social networking activities for personal purposes, you must indicate that your views are your own and do not necessarily reflect the opinions of Labcorp.

When using social media, you should be clear that you do not speak on behalf of Labcorp. You should always:

- State that the materials and opinions you are posting are yours and not Labcorp's
- Take every possible precaution to protect confidential information from disclosure
- Refrain from using any third-party logos or trademarks without express permission



### People Leader Tip

Executives, officers, directors and people leaders have a special responsibility when posting communications since their opinions may still be deemed to express the position of Labcorp.

### For More Information

[Labcorp Enterprise Social Media Policy](#)



### Protection and Proper Use of Labcorp Assets

We each have a responsibility to protect the Company's assets from theft, loss, misuse, carelessness and waste. Any suspected incident of fraud or theft should be immediately reported for investigation. All Labcorp assets should be used for legitimate business purposes and should not be used for non-Labcorp business, though incidental personal use may be allowed by your people leader. Travel and other business expenses should be reasonable and consistent with the Company's [Travel and Entertainment Policy](#).

If you are not sure whether reimbursement for a certain expense is permissible, ask your people leader or the Accounts Payable Department.

This obligation includes protection of Labcorp's proprietary information. Proprietary information includes intellectual property such as trade secrets, patents, trademarks and copyrights, as well as business, marketing and service plans, engineering and product ideas, designs, databases, records, customer lists, customer trade data, salary information and any unpublished financial data and reports. Unauthorized use or distribution of this information violates Labcorp policy. It could also be illegal and result in civil or even criminal penalties.

### Intellectual Property

Labcorp's intellectual property is an invaluable asset that must be protected at all times. Intellectual property includes our trademarks, brands, logos, copyrights, inventions, patents, know-how, confidential business information and trade secrets. You should never allow a third party to use our trademarks or other intellectual property without proper authorization and a license agreement that has been approved by the Law Department. Always use our trademarks and other intellectual property properly. Furthermore, our trademarks should never be used in a degrading, defamatory or otherwise offensive manner.

Our intellectual property also includes employees' work product. Unless subject to an exception or written agreement, any work you create, in whole or in part, in connection with your duties, and/or using Company time, resources, or information, belongs to Labcorp. For example, inventions, ideas, discoveries, improvements, artwork, processes, designs, software or any other materials you may help create or author in connection with your work for our Company belongs to Labcorp and is considered a work for hire. You should promptly disclose any invention so that it may receive the same protection as other intellectual property of our Company.

**“You are obligated to protect Labcorp's assets including its proprietary information.”**

### No False and Fraudulent Claims

Each claim or invoice that Labcorp submits for payment or approval must be truthful, accurate and contain appropriate codes reflecting properly documented item(s) or service(s) that Labcorp has delivered or performed. We timely correct any billing errors and make timely refunds of amounts determined to be due.

In the U.S., some services may be billed to government health care programs such as Medicare or Medicaid as well as to other government programs for contracted services. The U.S. federal False Claims Act (FCA) and the laws of many U.S. states contain specific prohibitions against the submission of false or fraudulent claims to these government programs and impose civil, criminal and administrative penalties. In addition to enforcement by the U.S. Department of Justice, the FCA allows individuals to file lawsuits on behalf of the U.S. government against persons or entities for violations of the law. Such lawsuits are known as qui tam actions. The FCA and many U.S. state laws provide certain protections to individuals who file qui tam lawsuits. Consistent with its non-retaliation policy, Labcorp prohibits retaliation in any form against individuals who bring such actions in good faith.

Our standard of truthful and accurate billing applies to all customers whether for health care services, clinical trial testing or other services provided by Labcorp.

### For More Information

[Compliance with False Claims Acts under Federal and State Laws Policy \(BPM-04\)](#)



### **Financial Integrity, Record Keeping and Retention**

Labcorp requires accurate and reliable recording and reporting of information to make responsible business decisions. Labcorp complies with all applicable tax laws and accounting and financial reporting standards including, without limitation, United States Generally Accepted Accounting Principles and rules issued by the United States Securities and Exchange Commission (SEC), including the Sarbanes Oxley Act.

Labcorp provides financial information to the public that is accurate. All of Labcorp's books, records, accounts and financial statements must be maintained in reasonable detail, must appropriately reflect Labcorp's transactions, and must conform both to applicable legal requirements and to Labcorp's system of internal controls.

All employees are responsible to report to Labcorp any questionable accounting or auditing matters that may come to their attention. Refer to the "[How Do I Report A Violation](#)" section for reporting options. Business records and communications often become public, and we should avoid exaggeration, derogatory remarks, guesswork, or inappropriate characterizations of people and companies that may be misunderstood. This applies equally to email, internal memos and formal reports.

Company records, including electronic communications, financial records and other information, are to be generated, retained, archived or destroyed in accordance with all applicable laws, rules, regulations, internal retention policies and legal hold notices. Records should not be destroyed before the expiration of any obligation to maintain such documentation. You must consult the Law Department before disposing of any documents potentially relevant to any litigation or internal or governmental investigation.



**“Labcorp provides financial information to the public that is accurate.”**

#### **For More Information**

[Record Retention and Destruction Policy and Retention Schedules \(BPM-21\)](#)

# Integrity



- 24 Securities Regulation – Insider Trading
- 24 Securities Regulation – Rules for Principal Executive Officer and Senior Financial Officer
- 25 Preventing Bribery and Corruption
- 26 Quality
- 26 International Trade and Sanctions



# Compliance with Regulatory Obligations

## Securities Regulation – Insider Trading

You may not use insider information for personal gain, and any such improper use of this information may be a serious violation of U.S. securities laws and similar laws in other countries. Employees, officers and directors who have access to confidential information are not permitted to use or share that information for stock trading purposes or for any other purpose except the conduct of our business. All non-public information about Labcorp should be considered confidential information. To use non-public information for personal financial benefit or to “tip” others who might make an investment decision on the basis of this information is strictly prohibited and may be illegal. These restrictions on insider trading also apply to the securities of Labcorp’s customers, suppliers, third parties and any of their affiliates.

### Watch out for:

- Buying, selling or otherwise trading in:
  - Labcorp stock while aware of non-public information about Labcorp
  - Competitor, supplier, vendor or client stock while aware of non-public information concerning the respective entity
- Disclosing inside information to another person, where not required by regular job duties

These include sharing information with close connections, such as family members and friends.



### Can I be penalized for insider trading if I do not live in the United States?

Yes, you may be subject to disciplinary action up to and including termination of employment. You could also be subject to fines, obligated to pay monetary damages or subject to other legal consequences.

## Securities Regulation – Rules for Principal Executive Officer and Senior Financial Officers

In addition to complying with all other parts of this Code, if you are Labcorp’s principal executive officer, principal financial officer, principal accounting officer or controller, or any person performing similar functions, or are involved in any aspect of preparing Labcorp’s financial statements, or the certifications on which such statements rely, you have specific responsibilities under the Sarbanes Oxley Act to provide full, fair, accurate, timely, and understandable disclosure in reports and documents that Labcorp files with, or submits to, the Securities and Exchange Commission (SEC) and in other public communications made by Labcorp.

### For More Information

[Insider Trading Policy \(BPM-16\)](#)





## Preventing Bribery, Corruption and Improper Influence

Bribery and corruption undermine our integrity and values, and our long-term success. We compete and seek to succeed based on the quality and value of our workforce and of the products and services we offer. Labcorp strictly prohibits giving or asking for anything of value to obtain an improper business advantage, whether to or from government officials, clients or other commercial entities. The promise, offer, or delivery of a gift, favor, or other payment for the purpose of improperly influencing a business decision would not only violate Labcorp policy, but could also constitute a criminal offense. Because payments (and other things of value, such as business courtesies, gifts or entertainment) to clients or government officials of any country require particular care, we strictly prohibit these without first obtaining prior review and written approval by the Chief Compliance Officer or designee. Moreover, any financial arrangement with a client or potential client should be carefully structured according to applicable Labcorp compliance and contracting requirements.

The U.S. Foreign Corrupt Practices Act prohibits giving gifts, benefits or anything of value, directly or indirectly, to officials of foreign governments, foreign political candidates and public international organizations like the World Health Organization or the United Nations and healthcare professionals employed at state-owned entities in order to obtain an improper business advantage. Other countries have enacted similar restrictions, such as the United Kingdom's Bribery Act, that cover both public and private sector employees.

Similarly, Labcorp complies with all federal and state laws and regulations that govern our financial relationships with U.S. healthcare providers in a position to make referrals or generate business for us, and we refrain from engaging in any arrangement that is intended to, or could be perceived as, improperly influencing a healthcare provider's medical judgment. Applicable laws include the federal Anti-Kickback Statute and Stark Law, which pertain to referrals made by physicians and other U.S. healthcare providers to clinical laboratories for diagnostic testing services reimbursed by the Medicare and Medicaid programs. Violations of these state and federal laws can result in significant criminal and civil penalties for both the companies and individuals involved.

### Things to Know

- Never give, offer, accept or promise a bribe
- Ensure all payments or gifts are properly recorded
- Third parties may not provide bribes or anything of value to improperly influence a decision maker on behalf of Labcorp
- All third-party suppliers, vendors or others receiving payment from Labcorp must comply with the [Supplier Code of Conduct](#)
- Know how to identify red flags (see list of examples in policies listed in For More Information below)

### The definition of Government Official is very broad. It includes:

- An employee, official, candidate for or member of government agencies, departments, or instrumentalities, whether elected or appointed, which include, without limitation:
  - Doctors and healthcare professionals (including nurses, lab personnel and their staff) working for government-owned hospitals and universities
  - Public health officials
  - Customs and importation officials
  - Healthcare regulators
  - Public international organizations

### For More Information

[Anti-Bribery and Anti-Corruption Policy \(BPM-05\)](#)

[Foreign Third Party Due Diligence Policy \(BPM-07\)](#)



## Quality

Labcorp upholds the highest ethical, scientific and medical standards in all diagnostic, research and development activities.

Labcorp maintains Quality Management Systems to consistently meet both regulatory and client requirements and actively promote a culture of quality. The Quality Management Systems include policies, procedures, training and continuous improvement processes focused on complying with all applicable laws, regulations and practice guidelines. These include Clinical Laboratory Improvement Amendments (CLIA), professional association requirements for pathology and clinical laboratory testing, Good Clinical Practices (GCP), and Good Laboratory Practices (GLP) and Good Manufacturing Practices (GMP), when applicable. The responsibility falls on us to understand and adhere to the relevant policies and procedures and to be accountable for the quality of our work.

It is fundamental to Labcorp's integrity that we maintain the quality and integrity of the results and data provided to clients and patients. Data integrity is the principal element of Labcorp's Quality Management System. We are responsible for maintaining complete, consistent and accurate data from creation through archival and destruction.

Animal research is often critical to developing new, safe and effective medicines, devices and products. Whenever possible, Labcorp will employ alternative scientific methods to animal use and support the development and adoption of alternative methods. Where animal testing is needed, Labcorp adheres to strict standards of ethical conduct and follows all applicable laws and regulations for animal treatment. Labcorp is committed to treating the animals in our care humanely and with respect.

## Trade Compliance

With global reach and locations worldwide, Labcorp complies with all applicable import, export and trade control laws and regulations in jurisdictions in which we operate and we expect the same of our third parties. These include:

1. U.S. and other applicable trade control laws—Embargoes restrict our ability to transact with certain countries, subject to license requirements, while other regulations restrict our interactions with certain individuals or entities.
2. Export control regulations—May restrict certain shipments or transmissions of goods, services and technology, whether export or reexport or use if the materials are created in the U.S. and sent cross border.
3. Anti-Boycott regulations—We refrain from cooperating in boycotts that the U.S. government does not support. For example, we would not accede to a client's demand if it refused to do business with Labcorp unless Labcorp boycotted Israel.
4. Other import and export laws and other regulations may exist to restrict trade with certain countries.

### Make sure you

- Know our business partners and the final destination of our products
- Obtain all necessary licenses before the export or deemed export of products, services or technology
- Report complete and accurate information on every imported product, such as its proper classification, place of manufacture, and full cost
- Ensure all third parties (e.g. vendors, consultants, HCPs, distributors,) engaged by or acting on behalf of Labcorp are subject to appropriate due diligence screening before entering into any business relationship
- Communicate any issues that are identified to appropriate Labcorp personnel, including the Law and Corporate Compliance Departments, Quality and Finance, as applicable

### Watch out for

- Any request to join in, support or provide information concerning a non-U.S. boycott and immediately report and any such requests to the Corporate Compliance Department

### For More Information

[Labcorp Diagnostics National Office of Quality](#)

[CLS Quality](#)

[International Trade Law Policy \(BPM-06\)](#)

# Inspiration



- 28 Human Rights
- 29 Public Service and Political Contributions
- 29 Environment, Health and Safety



# Community

## Human Rights

Labcorp recognizes the importance of maintaining and promoting fundamental human rights in our operations and throughout our supply chain. Labcorp formally committed as a participant in the United Nations Global Compact. Labcorp has developed a set of programs and policies derived from the principles and guidance of the United Nations, the International Labor Organization and the Organization for Economic Cooperation and Development. These programs and policies:

- Provide fair and equitable wages, benefits and other conditions of employment in accordance with local laws
- Recognize employees' right to freedom of association
- Provide humane and safe working conditions
- Support a work environment that is free from human and sexual trafficking, forced and bonded labor and unlawful child labor
- Promote a workplace free of discrimination and harassment
- Address the human rights and environmental issues connected with the mining and trading of Conflict Minerals



### For More Information

[Ethical Labor and Anti-Human Trafficking Policy \(BPM-18\)](#)

[Combatting Modern Slavery Statement](#)

[Conflicts Mineral Statement](#)



### Public Service and Political Contributions

Labcorp plays an important role in the political process by informing and working closely with governments and their representatives to adopt laws, regulations and policies to advance the Company's interests and to ultimately improve the health and lives of patients. All government relations activities or political contributions on behalf of the Company are to be conducted by, coordinated through, or performed in cooperation with, or at the request of, the Labcorp Global Government Relations and Public Policy Department, in accordance with Labcorp's Government Relations Policy and Procedures.

We encourage you to be active in the political and civic life of your communities, including charitable or educational activities. When doing so and making any public communication, you should clarify that your views are yours individually and are not being expressed as an employee of Labcorp unless authorized in the Labcorp Government Relations Policy and Procedures.

Unless authorized under the Labcorp Government Relations Policy and Procedures, you may not make any political contribution as a representative of Labcorp, and you must also avoid lobbying activities or even the appearance of lobbying any governmental body or public official as a representative of Labcorp. Please note that periodic requests from senior management to reach out to a government agency or an employee's legislative representatives with pre-approved content is not prohibited by this policy and does not constitute lobbying.

No officer or employee may make, authorize or permit any unlawful contributions, expenditure or use of corporate funds or property for political purposes.

### Environment Health and Safety

Labcorp strives to provide a safe and healthy work environment. More detailed information can be found in the Labcorp Corporate Responsibility Report available [here](#). You have a responsibility for maintaining a safe and healthy workplace for all by:

- Following all environmental health and safety rules and practices
- Reporting accidents, injuries, and unsafe equipment, practices, or conditions and developing corrective and preventive actions, as appropriate
- Taking all reasonable precautions when handling hazardous materials



**“Unless authorized under the Labcorp Government Relations Policy and Procedures, you may not make any political contribution as a representative of Labcorp, and you must also avoid lobbying activities or even the appearance of lobbying.”**

#### For More Information

[Labcorp Government Relations Policy and Procedures](#)

[Corporate Charitable Contributions Policy and Procedures](#)

## Waivers of or Changes in the Code of Conduct and Ethics

Any waiver of this Code or changes to this Code that apply to executive officers, including principal officers or directors, may be made only by Labcorp's Board or a Board committee and will be promptly disclosed to Labcorp's shareholders and otherwise as required by law, regulation of the SEC or stock exchange regulation.

## Administration

### Board of Directors

The Board of Directors, through the Audit and Quality and Compliance Committees, will help support the proper administration of this Code. The Audit Committee is responsible for monitoring compliance from a financial point of view and the Quality and Compliance Committee is responsible for monitoring compliance from a regulatory perspective. The Audit and Quality and Compliance Committees will be responsible for the annual review of the compliance procedures in place to implement this Code and will recommend clarifications or necessary changes to this Code to the full Board for approval.



### People Leader Tip

All officers and people leaders will be available to answer questions about this Code with their employees. Officers and people leaders are also responsible for the diligent review of practices and procedures in place to maintain compliance with this Code.

## Contacts:

### Corporate Compliance Department

- [Globalcompliance@labcorp.com](mailto:Globalcompliance@labcorp.com)

### The Privacy Office

- [Globaldataprivacy@labcorp.com](mailto:Globaldataprivacy@labcorp.com)
- [Privacyofficer@labcorp.com](mailto:Privacyofficer@labcorp.com)
- [DPO@labcorp.com](mailto:DPO@labcorp.com)

### Law Department

### Securities Compliance Officer

- [stockcompliance@labcorp.com](mailto:stockcompliance@labcorp.com)

## Resources:

### HR Central

### The Point—Enterprise Policies

### Office of Information Security

Labcorp Action Line: [Labcorp.ethicspoint.com](http://Labcorp.ethicspoint.com)

