



EVERSANA<sup>™</sup>  
INTOUCH

# EVERSANA INTOUCH CODE OF CONDUCT

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# 1 INTRODUCTION

## 1.1 COMMITMENT

EVERSANA INTOUCH is part of a family of businesses united under a shared mission to improve the lives of the patients we serve and act with their best interests in mind. Everything we do is driven by our core cultural beliefs. These beliefs are our unifying force, connecting us across many business units, geographies, and patient services.

**Patient Minded**

I act with the patients' best interest in mind.

**Client Delight**

I own every client experience and its impact on results.

**Take Action**

I am empowered and hold myself accountable.

**Grow Talent**

I own my development and invest in the growth of others.

**Win Together**

I passionately connect with anyone, anywhere to achieve results.

**Communication Matters**

I speak up to create transparent, thoughtful, and timely dialogue.

**Embrace Diversity**

I create an environment of awareness and respect.

**Always Innovate**

I am bold and creative in everything I do.

We do all of this in accordance with the highest ethical standards, honesty, integrity, and in accordance with all applicable laws and regulations. We do not condone any illegal act, even if it was ordered by a manager or company executive. Each employee has a responsibility to notify management in a timely manner of any known or suspected violation of this code, any company policy, or any law or regulation. Silence or ignoring questionable behavior is not an acceptable alternative.

Further, all staff are expected to act lawfully, honestly, ethically, and in the best interests of the company while performing duties on behalf of EVERSANA INTOUCH, in accordance with the guidelines set forth in this document.

## 1.2SCOPE

This code applies to all individuals (staff) doing work on behalf of EVERSANA INTOUCH, including employees, contractors, freelancers, consultants, interns, and other temporary personnel, across all EVERSANA INTOUCH affiliates.

## 1.3ROLES AND RESPONSIBILITIES

ROLE	RESPONSIBILITY
<b>Individual Staff Members (Everyone)</b>	<ul style="list-style-type: none"><li>• Read, understand, and adhere to this code</li><li>• Promote an environment in keeping with the highest ethical standards</li></ul>
<b>Executive Team</b>	<ul style="list-style-type: none"><li>• Consider ethical principles when setting organizational goals and planning</li><li>• Review this code annually</li><li>• Set an example for staff to follow</li></ul>
<b>Management</b>	<ul style="list-style-type: none"><li>• Support staff in their adherence to this code</li><li>• Consider this code when guiding direct reports</li><li>• Understand and live our values</li></ul>

## 2 IMPORTANT ASPECTS OF THIS CODE

### 2.1 CONFLICTS OF INTEREST

EVERSANA INTOUCH staff should attempt to avoid actual or apparent conflicts of interest. A conflict of interest exists when a staff member's personal interests interfere with the best interests of EVERSANA INTOUCH.

The best rule for any situation that appears to present a conflict of interest is to abstain and disclose. If it is not possible to avoid participating in the event or activity creating the conflict, staff should:

1. Promptly disclose the potential conflict to their supervisor and submit a request to the legal department
2. Avoid participating in decisions that might raise the appearance of a conflict until the legal department provides appropriate guidance

All anti-bribery laws are applicable to EVERSANA INTOUCH staff, including those prohibiting kickbacks, bribery, or other illicit payments and those ensuring fair competition.

Some specific potential conflicts of interest are described below.

#### 2.1.1 OUTSIDE BUSINESS AND CONSULTING ENGAGEMENTS

EVERSANA INTOUCH staff must obtain approval from the legal department prior to beginning any employment, business, or consulting relationship with another company that is a current or potential competitor of EVERSANA INTOUCH or that otherwise has a business relationship with EVERSANA INTOUCH, or accepting any teaching engagements with an educational institution, establishment, or other organization.

Staff should also avoid conducting EVERSANA INTOUCH business with family members or others with whom they have a significant personal or financial relationship without prior approval from the legal department.

#### 2.1.2 GIFTS AND ENTERTAINMENT

Giving or receiving gifts or entertainment to or from a current or future client or business partner can potentially create a conflict of interest, especially if the value of the item is significant. Accepting or providing gifts (such as company-branded items or simple gift baskets) is generally fine if the market value of the item is less than USD \$200.

Additionally, accepting or providing certain business entertainment (such as an invitation to attend a local cultural or sporting event, or a celebratory meal with a business partner) can be appropriate, provided that the entertainment or meal is reasonable and customary and in the furtherance of a business relationship/ the cost is not excessive; and it won't inappropriately bias future decision-making about working with the partner or create an appearance of impropriety. Staff should never give or receive cash, cash equivalents (such as gift cards), loans, or any item that obligates them to provide something in return and should not actively solicit gifts or entertainment from a current or potential client or business partner.

While staff cannot give anything of value to a government official to get or keep business or gain an improper advantage, staff may provide modest gifts, meals, and entertainment to government officials

where there is a legitimate purpose, and the thing of value is not being provided in exchange for any action or inaction by the official.

### 2.1.3 CORPORATE OPPORTUNITIES

EVERSANA INTOUCH staff may not exploit or take advantage of business opportunities that are discovered through the use of EVERSANA INTOUCH's property, information, or position for personal gain unless the opportunity is disclosed fully in writing to the company and EVERSANA INTOUCH declines to pursue such opportunity.

#### 2.1.3.1 FREELANCING

In a creatively driven field such as ours, we understand the desire to keep your skills sharp outside of the office. However, our clients' needs, interests and confidentiality must also be kept in consideration. Therefore, staff interested in working on freelance projects outside of their time at EVERSANA INTOUCH must first discuss the opportunity with their department head prior to making any commitments. As common sense would dictate, freelancing for former or current clients, their competitors, or other agencies is prohibited, as is the use of EVERSANA INTOUCH time, materials, or resources on freelance projects.

### 2.1.4 POTENTIALLY CONFLICTING RELATIONSHIPS

Staff with a personal or financial relationship with any service providers to EVERSANA INTOUCH, such as vendors, suppliers, or contingent workers, for which they have work-related responsibilities (e.g., as an EVERSANA INTOUCH client manager participating in vendor selection, determining terms of a contract or assignment, etc.), must disclose that relationship to the legal department by submitting a request via the legal inbox and recuse themselves from any decision-making regarding that service provider.

A conflict of interest may also occur when an employee or employee's family member receives a personal benefit as a result of their position with EVERSANA INTOUCH. Similarly, staff may not use their position at EVERSANA INTOUCH to request personal benefits for themselves or family members.

Members of an employee's immediate family may be considered for employment on the basis of their qualifications. However, if employing an immediate family member would create a manager/subordinate relationship with a family member, have the potential to create an adverse impact on work performance, or create either an actual conflict of interest or the appearance of a conflict of interest, the candidate may not be hired.

This code must also be considered when assigning, transferring, or promoting an employee. For the purpose of this code, immediate family includes spouse/domestic partner, parent, child, sibling, in-law, aunt, uncle, niece, grandparent, grandchild, and members of household. This code also applies to romantic relationships.

#### 2.1.4.1 OFFICE ROMANCE

EVERSANA INTOUCH's culture is an informal and friendly one. In the course of work, people may discover that they have similar interests and wish to explore a relationship outside the work environment. EVERSANA INTOUCH does not completely prohibit office relationships. However, employees must act responsibly and be aware that concerns may arise regarding the consensual nature of the relationship. Any romantic relationship between a supervisor and an employee they supervise is prohibited. If such a relationship arises, the parties in question must immediately communicate it to HR. One or both parties

may be transferred, if possible. If not possible, then EVERSANA INTOUCH may have to terminate the employment of one of the employees involved. A romantic relationship between individuals working together on the same team should also be communicated to HR.

## 2.2 COMMUNICATIONS

All business records and communications, including electronic communications (such as email, messaging, video conferencing, chat rooms, phones, and fax), should be clear and accurate. EVERSANA INTOUCH may have obligations to preserve electronic communications and other information in connection with actual or anticipated legal events, such as lawsuits, arbitration, governmental investigations, and subpoenas. Upon direction from the legal department, staff must not destroy, delete, or modify electronic communications or information subject to a legal hold. These communications may be shared or become public through legal events or publication in the media. Potential risks from inaccurate or misleading statements include, but are not limited to, claims of false advertising, misrepresentation, breach of contract, securities fraud, unfair disclosure, and antitrust violations.

Staff may not give an endorsement or other statement on behalf of EVERSANA INTOUCH — or a personal endorsement that identifies your affiliation with EVERSANA INTOUCH — except when approved by the marketing or legal department. Staff may also not discuss EVERSANA INTOUCH's business, including financial condition, business or financial performance, products, or business prospects, with financial analysts or actual or potential investors without the prior approval of the legal department.

### 2.2.1 RECORDS MANAGEMENT

The records and information that we create, circulate, and manage within our organization are the lifeblood of operations. Accurate, complete, and responsibly created information helps us thrive as an organization, while misleading information hinders our efficiency and can harm our reputation or subject us to fines and penalties. When creating and managing organizational records and information, staff should always create records responsibly and retain records required for specific legal or organizational reasons; preserve records and information relevant to litigation, investigations, and audits; and dispose of records responsibly.

### 2.2.2 SOCIAL MEDIA

Staff should remember the internet is a public place and protect EVERSANA INTOUCH's proprietary information by:

1. Refraining from commenting on legal matters and disclosing intellectual property and confidential information
2. Being open about their employment by EVERSANA INTOUCH when discussing the company or products
3. Clearly stating that any opinions are their own and not those of EVERSANA INTOUCH
4. Sharing good news with permission (e.g., announcing awards only after EVERSANA INTOUCH has made them public)

*Note: This code does not apply to execution of social media work performed on behalf of the client. These activities are covered by the client's social guidelines found in their*

*respective MSA. This code also does not prevent staff from discussing their wages, benefits, or working conditions or engaging in other actions which are legally protected under the National Labor Relations Act, if applicable, or other applicable law.*

### 2.2.3 PUBLIC MEDIA

Staff must consult with the communications department and their department director about requests for information about EVERSANA INTOUCH, our products, our business, or fellow staff to journalists, bloggers, and industry analysts through any public forum.

Our goals in responding to public media requests are to ensure that we do not reveal — or even appear to reveal — confidential information, that any communication complies with client MSAs and client conflict, that we communicate a consistent message, and that we provide positive and proactive thought leadership. Therefore, EVERSANA INTOUCH authorizes only designated representatives in the communications department to speak to the media on behalf of EVERSANA INTOUCH.

## 2.3 DATA AND ASSET PROTECTION

Depending on each person's role at EVERSANA INTOUCH, they may have access to information systems or tools that enable them to view certain information relating to clients and other individuals (including coworkers and registered and non-registered individuals) which would otherwise not be visible to them. These tools are important and necessary to enable staff to perform work effectively. However, it is of the utmost importance that all EVERSANA INTOUCH staff treat this data with extreme sensitivity and caution. Staff are only authorized to access this data to the extent it is required to do their jobs. This data is confidential and subject to privacy protections in many jurisdictions. EVERSANA INTOUCH's brand and the trust clients put in us depend on responsible use of these tools.

### 2.3.1 EVERSANA INTOUCH ASSETS

EVERSANA INTOUCH staff are provided with a wide range of valuable assets to help them perform the highest level of work on behalf of EVERSANA INTOUCH. These assets include computer equipment, mobile devices, communications platforms and equipment, software, office and electronic equipment, and facilities. EVERSANA INTOUCH staff are expected to treat these assets with care and use them with the best interests of the business in mind and in accordance with the Information Security policy. This means assets should be well maintained and not subject to unreasonable use. If something an employee is using is damaged, they should ensure it gets fixed. In addition, staff should use judgment in using company assets for personal matters; while EVERSANA INTOUCH recognizes that personal use occurs, it should not be excessive or interfere with performance of business duties.

### 2.3.2 CONFIDENTIAL INFORMATION

EVERSANA INTOUCH staff are required to use confidential information — from EVERSANA INTOUCH, our clients, and our third parties with which we've signed a non-disclosure agreement — for business purposes only and must always keep such information in strict confidence. Confidential information includes, without limitation, proprietary data, trade secrets and know-how such as software and product designs, product plans, inventions, processes, designs, drawings, engineering, customer lists, employee data (other than their own), financial information, budgets, pricing, business plans, or other business information.



Staff obligation to maintain the confidentiality of this information means that it may not be shared outside of EVERSANA INTOUCH unless an appropriate non-disclosure agreement is in place. EVERSANA INTOUCH staff should also refrain from sharing confidential information internally beyond those persons who legitimately need to know it for the purposes of their job. Staff are asked to keep in mind that improper use or disclosure of confidential business information could seriously damage EVERSANA INTOUCH's reputation with clients, business partners, and the community; expose us to liability; and cause harm to our business.

In addition, staff are not to bring to EVERSANA INTOUCH, or use or disclose to any person associated with EVERSANA INTOUCH, any confidential or proprietary information belonging to any former employer or other person or entity to which is owed an obligation of confidentiality under any agreement or otherwise. EVERSANA INTOUCH does not need and will not use such information and will assist staff in any way possible to preserve and protect the confidentiality of proprietary information belonging to third parties.

The following departments are available to answer employee questions and concerns about all types of confidentiality:

- Internal Compliance: Fields questions related to [client conflict and client confidentiality](#).
- HR: Handles matters related to employee confidentiality. Staff should contact their designated HR business partner.
- Finance: Handles matters related to corporate confidentiality.

Additional ways in which we protect confidential information are described below.

*Note: This code is not intended to restrict an employee's legal right to discuss the terms and conditions of their employment.*

### **2.3.2.1 CLEAN DESK**

All staff are responsible for reducing the possibility of exposure and loss of sensitive data. This key behavior of concealing sensitive information ensures our compliance to contractual and regulatory obligations. It also supports information security measures and improves the appearance and productivity of our offices.

The following are the *minimum* actions to be taken to always ensure compliance with this guideline:

- Lock computer screens when not in use.
- Store hard copy assets of client prelaunch work (e.g., documents, systems, printouts) containing client information out of sight when not in use.
- Secure licensed information or content owned by the client at all times.
- Destroy paper documents related to client product development or marketing strategy by shredding when no longer needed. Employees should take proactive action to pick up and/or destroy any sensitive client documents left at a printer.
- Lock up mass storage devices such as CDs, DVDs, jump drives, etc., containing sensitive information at the end of the day.

*Note: In general, we discourage the use of mass storage devices.*



### 2.3.2.2 CLIENT CONFLICT

Because some of our clients have a competitive conflict with each other, EVERSANA INTOUCH has developed a way to serve them while preventing cross-exposure of their strategic work among select EVERSANA INTOUCH staff assigned to these competing brands. This gives our clients the advantage of our specialized expertise while protecting their brand and strategy.

When taking on new business, we assess clients for conflict, classify the level of restriction needed, and apply the appropriate measures to prevent cross-exposure. These measures physically and logically separate EVERSANA INTOUCH staff working on conflict accounts in strategic roles.

A particularly sensitive situation arises when we are working on new product launches, which demand much more stringent protections. Any and all information about a new product must be kept strictly confidential until the FDA has approved the product for use and the client has approved marketing materials for release. It may not even be discussed with other EVERSANA INTOUCH staff who are outside of the launch team.

As an added layer of protection, staff who are dedicated to one conflicting brand are not authorized to work on a competing brand for three months.

## 2.4 ETHICS

### 2.4.1 BUSINESS INTEGRITY AND FAIR COMPETITION

EVERSANA INTOUCH commits to employing fair business practices, including accurate and truthful advertising. All corruption, extortion and embezzlement are prohibited. EVERSANA INTOUCH shall not pay or accept bribes or participate in other illegal inducements in business or government relationships. EVERSANA INTOUCH shall conduct business consistent with fair and vigorous competition and in compliance with all applicable anti-trust laws.

### 2.4.2 ANIMAL WELFARE

EVERSANA INTOUCH believes animals should be treated humanely with pain and stress minimized, and that animal testing shall be performed only after consideration to replace animals, to reduce the numbers of animals used, or to refine procedures to minimize distress. Alternatives shall be used wherever these are scientifically valid and acceptable to regulators.

### 2.4.3 PRIVACY

EVERSANA INTOUCH is committed to safeguarding and making only proper use of confidential information to ensure that all applicable privacy rights are protected, utilizing industry-standard privacy and security measures in compliance with applicable regulations and laws. See our [Privacy Policy](#) to learn more about the protections we have in place.

## 2.5 DIVERSITY, EQUITY, AND INCLUSION

EVERSANA INTOUCH is an equal opportunity employer and makes employment decisions on the basis of merit. Personnel actions are taken without regard to race, religious creed, color, sex, gender identity or expression, national origin, ancestry, age, sexual orientation, physical or mental disability, marital status,

medical condition, pregnancy or childbirth, veteran status, or any other classification that is protected under recognized federal or applicable state or local law. This policy also prohibits unlawful discrimination based on the perception that anyone has any of those characteristics or is associated with a person who has or is perceived as having any of those characteristics. In addition, EVERSANA INTOUCH prohibits the harassment of any individual on any of the bases listed above. EVERSANA INTOUCH expects that the spirit of this policy will govern the actions of all employees.

Please see our Diversity, Equity, and Inclusion policy found on our [Policies and Reporting](#) page for more information.

## 2.6 WORKPLACE SECURITY AND SAFETY

EVERSANA INTOUCH is committed to providing a healthy, safe, and secure work environment to our employees, contractors, and visitors. Our programs focus on general security and safety awareness, training, reporting, and proactive risk identification and response. Staff should follow all security and safety rules and report unsafe situations to their supervisor; HR; or [Lighthouse Services](#), our anonymous reporting hotline.

Violence and threats of violence are not acceptable at EVERSANA INTOUCH. Possession and use of weapons are also prohibited in the workplace. If someone appears to be in immediate danger, staff should contact local authorities right away.

Individuals who engage in violent or prohibited behavior (see below) may be removed from the premises and subject to dismissal or other disciplinary action, arrest, and/or criminal prosecution. During investigations, employees may be placed on administrative leave and subject to a fit-for-duty examination prior to returning to the workplace. This applies to all work locations, including offices, work sites, vehicles, and field locations.

### 2.6.1 PROHIBITED BEHAVIOR

EVERSANA INTOUCH does not tolerate behavior, whether direct or via company facilities, property, or resources that:

- Is violent
- Threatens violence, even “jokingly”
- Harasses or intimidates others
- Interferes with an individual's legal rights of movement or expression
- Disrupts the workplace, our collegial environment, or the company's ability to service our clients

Violent or threatening behavior can include, but is not limited to, physical acts; oral or written statements; harassing telephone calls; pointing, holding, or brandishing a firearm; gestures and expressions; or behaviors such as stalking or violent horseplay.

The use of illegal drugs and inappropriate or excessive use of alcohol are not permitted in the workplace. EVERSANA INTOUCH is also a smoke-free and vape-free workplace. The use of traditional tobacco products (including smokeless tobacco) and electronic nicotine delivery systems or electronic smoking devices is prohibited in all office locations. Smoking is allowed outside the EVERSANA INTOUCH offices in accordance with each location's designated outdoor areas.

## 2.7 FINANCIAL INTEGRITY

EVERSANA INTOUCH takes financial integrity seriously and works to minimize fraud as much as possible. As part of this effort, staff are expected to maintain complete and accurate business records, including financial accounting records and quality control reports.

## 2.8 GOVERNMENT INQUIRIES AND INVESTIGATIONS

EVERSANA INTOUCH operates in a highly regulated environment. Many areas of our operations are governed by strict legal requirements. This means that, from time to time, governments in the states in which we operate may inspect our operations or request information from us. Staff interacting with government officials on behalf of EVERSANA INTOUCH, including hosting government inspections, must be sure any representations made to any government agency are accurate. Therefore, they must be reviewed and approved by the Chief Compliance Officer or legal department before being signed by an authorized party.

## 2.9 POLITICAL CONTRIBUTIONS

EVERSANA INTOUCH believes that it is every employee's individual right and responsibility to engage in political activities. If an employee is involved in personally supporting a political candidate, they may engage in such political activities in their own time, with their own resources. This means that any money donated to a political party or candidate, and any resources required, must not be from any part of EVERSANA INTOUCH.

## 2.10 THIRD-PARTY SOFTWARE

Staff should exercise caution in obtaining third-party software from others, including commercial and open-source software (e.g., computer programs, databases, or related documentation in any stage of development and on either tangible media — like CDs, portable devices, and publications — or downloadable or accessible for use online). The license for the software sets out the rights and obligations that must be complied with, such as how and where the software may be used, whether it may be modified or distributed, and, possibly, what rights EVERSANA INTOUCH is obligated to grant to others. For this reason, software contracts, end-user license agreements, or terms of use must be reviewed by the procurement department prior to download or utilization. Upon approval, the terms and conditions of the license agreement must be strictly followed.

## 2.11 QUALITY TO OUR CLIENTS

Our clients outsource processes to us that are very important to their operations. As such, we work to maintain the quality of the services we are contracted to provide to our clients in accordance with applicable legal and regulatory requirements. Every employee must demonstrate an ongoing commitment to quality and is responsible for following our quality policies and procedures.

## 2.12 TIME AND RESOURCES

To assist staff in performing their duties, EVERSANA INTOUCH provides resources and materials. Misusing or wasting these resources and materials can negatively impact our ability to meet the needs of our clients, as well as impact the organization's growth and success. Staff are expected to responsibly manage any resources and materials provided by EVERSANA INTOUCH for the purposes of performing the duties associated with their role.

## 3 RESOURCES AND OTHER INFORMATION

### 3.1 VIOLATIONS

Violations of this code can be reported to EVERSANA INTOUCH HR or to our anonymous reporting hotline, Lighthouse Services. (See below for contact information.) Individuals who violate this code could experience:

- Being removed from client business and breach appended to employee record
- Being terminated from EVERSANA INTOUCH
- Contract termination and barred from working for EVERSANA INTOUCH
- Being given a court order and/or involved in legal proceedings related to the violation

Allegations that are false or made with reckless failure to determine the truth may result in disciplinary action up to and including termination.

#### 3.1.1 GOOD FAITH REPORTING AND NON-RETALIATION

It is against EVERSANA INTOUCH policy for any staff to retaliate against any person for reporting what they believed in good faith to be a violation of this code, expressing an intent to report what they believed in good faith to be a violation of this code, assisting other staff in reporting a violation of this code, or participating in any investigation pursuant to this code. Acting in good faith means that all reports of possible violations of this code, company policy, or the law are made sincerely and honestly. In other words, it does not matter whether the report turns out to be true, as long as it's made with the best intentions. In return, the company is committed to non-retaliation. In order to operate effectively, it is vital for all company employees to trust and respect each other.

If an EVERSANA INTOUCH employee learns about or suspects a violation of this code, another EVERSANA INTOUCH policy, or any law, they should promptly report it to their manager, another manager, HR, or the legal department, or to Lighthouse Services, our anonymous reporting hotline:

- Website: [www.lighthouse-services.com/intouchg](http://www.lighthouse-services.com/intouchg)
- Toll-Free Telephone:
  - English speaking USA and Canada: 877-500-0067
  - Spanish speaking USA and Canada: 800-216-1288
- E-mail: [reports@lighthouse-services.com](mailto:reports@lighthouse-services.com) (must include company name with report)
- Fax: (215) 689-3885 (must include company name with report)

In cases in which an individual reports a suspected violation of policy in good faith and is not engaged in the reported conduct, EVERSANA INTOUCH will attempt to keep its discussions and actions confidential to the greatest extent possible and in compliance with applicable laws and regulations governing privacy. EVERSANA INTOUCH will not retaliate against anyone making a good faith report of a potential violation. EVERSANA INTOUCH will appropriately investigate any report of a violation. Staff must cooperate fully with any investigation but should not investigate independently, as alleged violations may involve complex legal issues, and they may risk compromising the integrity of a formal investigation.

## 3.2SUPPORTING POLICIES

Find our policies on our [Policies and Reporting](#) page.

- Diversity, Equity, and Inclusion
- Supplier Code of Conduct
- Labor and Human Rights