

Code of Ethics

Approved by the Boards of Directors of IQVIA Solutions Italy S.r.l., IQVIA RDS Italy S.r.l., IQVIA CSMS GmbH, Educom S.r.l. on 07/10/2024.

CODE OF ETHICS

INDEX

1. PREMISES	3
1.1. What does Legislative Decree no. 231/2001 provide?	3
1.2. What are the responsibilities for the Company	3
1.3. What are the risks for individuals who commit one of the crimes indicated in the Decree?	4
1.4. What are the crimes that trigger the Company's liability?	4
1.5. What is an Organization and Management Model?	5
1.7. What is the Supervisory Body?	6
1.8. What is the Disciplinary System	7
2. VALUES	7
3. PRINCIPLES	7
3.1. General principles	7
3.2. Principles and rules of conduct in relations with Public Administrations	8
3.3. Principles and rules of conduct in the management of contributions, financing and public disbursements	10
3.4. Organization principles	11
3.5. Principles and rules of conduct aimed at protecting health, hygiene and safety in the workplace	12
3.6. Principles relating to cyber crimes	13
3.7. Principles relating to relationships with suppliers, customers, business partners, collaborators and, in general, third parties. Anti-money laundering and corruption between private individuals	14
3.8. Principles relating to Corporate Governance and to the drafting of corporate documents	15
3.9. Principles and rules of conduct in relations with judicial, inspection and supervisory authorities	16
3.10. Principles relating to transnational offences	17
3.11. Principles relating to the protection of industrial and intellectual property	17
3.12. Principles relating to the use of company information systems	18
3.13. Principles relating to human resources management	18
3.14. Principles relating to accounting management	19
3.15. Principles relating to clinical research activity	20
4. CONTROL ORGANS AND MECHANISMS	21
4.1. The Supervisory Body	21
4.2. The sanctions	21
5. THE CODE IN THE COMPANY	22
5.1. Knowledge	22
5.2. Internal reporting	22
6. GLOSSARY	23

1. PREMISES

This Code of Ethics (hereinafter, the "**Code**") summarises the principles, values and ethical rules that IQVIA Solutions Italy S.r.l., IQVIA RDS Italy S.r.l., IQVIA CSMS GmbH, Educom S.r.l. (hereinafter jointly, the "**Company**" or "**IQVIA**") considers fundamental and indispensable, and requires the most careful observance of which by its employees, collaborators and, more generally, by those who intend to operate with or for the Company in any capacity (e.g. suppliers, consultants, customers, etc.); in fact, the Company considers the need to respect (and ensure that anyone who interfaces with it respects) the highest ethical and transparency standards to be more important than any commercial requirement.

The rules and principles contained in this Code are added to, integrated and completed by, those already present in the Corporate Conduct Policy, adopted by all companies in the IQVIA group, which therefore remains valid and binding.

The Code is addressed to: directors, employees, consultants, coordinated and continuous collaborators, customers, agents and attorneys of the Company, as well as third parties who act on behalf of the Company or have any commercial or collaborative relationship with the latter (hereinafter "**Subjects**").

1.1. What does Legislative Decree no. 231/2001 provide?

The Decree provides that the Company is liable for crimes committed in its interest or to its advantage by:

- a) people who hold representative, administrative or management roles in the Company;
- b) persons subject to the direction or supervision of one of the subjects under a).

The Company is not liable for any crime committed by the above-mentioned persons in the event that:

- a) the Company's governing body has adopted and effectively implemented organizational and management models suitable for preventing crimes of the type that occurred;
- b) the task of supervising the functioning and compliance with the aforementioned models has been entrusted to a body of the Institution (Supervisory Body) with autonomous powers of initiative and control;
- c) the natural persons who committed the crime acted by fraudulently evading the organizational model;
- d) there has been no omission or insufficient supervision by the Supervisory Body referred to in letter b) above;
- e) in compliance with the Whistleblowing Decree, measures and sanctions have been adopted to protect those who make detailed reports of illicit conduct, relevant for the purposes of Legislative Decree 231/01 and/or the Whistleblowing Decree or violations of the Model.

1.2 What are the responsibilities for the Company

The sanctions provided for by Legislative Decree 231/01 against the entity are:

- a) Pecuniary sanctions: from a minimum of Euro 25,823 to a maximum of Euro 1,549,370
- b) Prohibitive sanctions (lasting no less than 3 months and no more than 2 years):
 - prohibition from carrying out the activity;
 - suspension or revocation of authorisations, licences or concessions functional

to the commission of the offence;

- prohibition of contracting with the Public Administration;
 - exclusion from benefits, financing, contributions or subsidies;
 - prohibition of advertising goods or services.
- c) Confiscation: of the price or profit of the crime;
- d) Publication of the sentence of conviction.

1.3 What are the risks for individuals who commit one of the crimes indicated in the Decree?

Anyone who commits one of the crimes indicated in the Decree will be personally and criminally responsible for the illicit conduct he has carried out, subject to disciplinary sanctions by the Company and criminal sanctions by the Judicial Authority.

1.4 What are the crimes that trigger the Company's liability?

The crimes that may entail the liability of the Company are those indicated in articles 24 to 25 *octiesdecies* of Legislative Decree 231/2001 and reported here:

- crimes against public administration (such as, by way of example, corruption, undue inducement to give or promise benefits, embezzlement to the detriment of the State, fraud to the detriment of the State, another Public Entity or the European Union, computer fraud to the detriment of the State, illicit influence peddling, fraud in public supplies, referred to in articles 24 and 25 of Legislative Decree 231/2001);
- crimes relating to computer crime (referred to in art. 24-*bis* of Legislative Decree 231/2001);
- organised crime crimes referred to in art. 24 *ter* of Legislative Decree 231/2001 (criminal association, including mafia-type; political-mafia electoral exchange, etc.);
- crimes against public faith (such as, for example, counterfeiting of coins, public credit cards and revenue stamps, referred to in art. 25-*bis* of Legislative Decree 231/2001);
- crimes against industry and commerce referred to in art. 25 *bis.1* Legislative Decree 231/2001 (illegal competition with violence or threats; fraud in the exercise of commerce, etc.);
- corporate crimes (such as, by way of example, false corporate communications, obstruction of control, illicit influence on the assembly, corruption between private individuals, incitement to corruption between private individuals referred to in art. 25-*ter* of Legislative Decree 231/2001);
- crimes relating to terrorism and subversion of the democratic order (referred to in art. 25 - *quater* of Legislative Decree 231/2001);
- crimes of practices of mutilation of female genital organs (referred to in art. 25-*quater.1* Legislative Decree 231/2001);
- crimes against the individual (such as, by way of example, child prostitution, child pornography, human trafficking and the reduction or maintenance of persons in slavery or servitude, illicit intermediation and exploitation at work referred to in art. 25-*quinquies* of Legislative Decree 231/2001);
- crimes relating to market abuse (for example, abuse of privileged information and market manipulation, referred to in art. 25-*sexies* Legislative Decree 231/2001);
- transnational crimes referred to in art. 10 of Law 16 March 2006, n. 146, on "ratification and implementation of the United Nations Convention and Protocols against Transnational Organized Crime, adopted by the General Assembly on 15 November 2000 and 31 May 2001";
- crimes committed in violation of accident prevention regulations and regulations on the protection of health and hygiene at work (referred to in art. 25-*septies* Legislative Decree 231/2001);

- crimes of receiving stolen goods, money laundering, self-laundering and use of money, goods or utilities of illicit origin (referred to in art. 25-*octies* Legislative Decree 231/2001);
- crimes relating to payment instruments other than cash (referred to in art. 25-*octies.1* of Legislative Decree 231/2001);
- crimes relating to the violation of copyright referred to in art. 25 *novies* of Legislative Decree 231/2001 (unauthorized publication, duplication, distribution of protected intellectual works, etc.);
- crime of inducing someone not to make statements or to make false statements to the Judicial Authority, referred to in art. 25 *decies* Legislative Decree 231/2001;
- environmental crimes, referred to in the art. 25-*undecies* of Legislative Decree 231/01;
- crimes related to the employment of third-country nationals whose stay is irregular, referred to in art. 25-*duodecies* of Legislative Decree 231/01;
- crimes of xenophobia and racism, referred to in art. 25-*terdecies* of Legislative Decree 231/01;
- crime of fraud in sports competitions, illegal exercise of gaming or betting and gambling carried out by means of prohibited devices, referred to in art. 25- *quaterdecies* of Legislative Decree 231/01;
- obstacle or conditioning of inspection or verification procedures and activities for the protection of national cyber security referred to in art. 24 bis;
- tax crimes (such as, for example, fraudulent declaration through the use of invoices or other documents for non-existent transactions, fraudulent declaration through other devices; issuing invoices or other documents for non-existent transactions; concealment or destruction of accounting documents referred to in art. 25-*quinquesdecies* of Legislative Decree 231/2001, etc.);
- smuggling crimes referred to in art. 25-*sexiesdecies*;
- crimes against cultural heritage, referred to in articles 25-*septiesdecies* and 25-*octiesdecies* of Legislative Decree 231/2001.

1.5 What is an Organization and Management Model?

A set of rules, tools and principles of conduct, functional to provide the Company with an effective organizational and management system suitable for identifying and reasonably preventing the commission of crimes that give rise to liability pursuant to Legislative Decree 231/01 and to which the Recipients thereof must therefore conform their conduct.

The Company's Organizational Model (hereinafter the "Model") is made up of:

- a General Part, containing a description of the reference regulatory framework, of the Model as a whole, of the functioning of the Supervisory Body, of the disciplinary system and of the training and communication plan;
- a Special Part, containing an in-depth description of the areas of company activity at risk of committing the crimes giving rise to liability pursuant to Legislative Decree 231/01 and of the principles of conduct which the recipients of the Model must strictly adhere to in said areas.
- a series of attachments which form an integral and substantial part of it, namely:
 - 1) D. Legislative Decree 231/2001;
 - 2) Group Business Conduct;
 - 3) Code of Ethics;
 - 4) IQVIA Organizational Manual;
 - 5) Mapping of areas at risk of crime (where there is a link to the reference procedures);
 - 6) Procedures;
 - 7) Regulation of the Supervisory Body;

- 8) Whistleblowing Regulations and Reporting Form;
- 9) Methodology adopted for the construction of the IQVIA Model;
- 10) Risk Assessment Document (RAD).

1.6 What is an Ethical Code?

Codes are official documents of the Company that contain the set of principles that inform its activity and that of the subjects that act on its behalf or that have a commercial or collaborative relationship with it. These codes aim to recommend, promote or prohibit certain behaviors, beyond and independently of what is provided for at a regulatory level. Codes are documents desired and approved by the highest management of the company.

1.7 What is the Supervisory Body?

It is an internal body of the company, independent and not subject to any hierarchical constraint within the Company, with the exception of the obligation to report to the highest management body, equipped with autonomous powers of initiative and control, which has been entrusted with the task of monitoring the effective application of the Model, of ensuring its updating, of collecting reports from company personnel or third parties regarding any violations and of reporting to the Board of Directors or other competent corporate bodies any violations in compliance with the whistleblowing legislation and any violations from which liability may arise pursuant to Legislative Decree 231/01.

1.8 What is the Disciplinary System

The disciplinary system is provided for by art. 6, paragraph 2, letter e) of the Decree and has the purpose of making all the measures indicated in the Model mandatory, sanctioning failure to comply with them.

2. VALUES

The Company intends to ensure that its employees, those in senior positions and all those who act on behalf of the Company do not commit crimes that could not only discredit the image of the Company itself, but also lead to the application of one of the pecuniary and/or interdictory sanctions provided for by Legislative Decree no. 231/2001. To this end, the Company has intended to adopt this Code of Ethics, aimed at introducing a system of principles that must inspire the behavior of all individuals belonging to the Company or those who act on its behalf, both in Italy and abroad.

The Code is part of a more general project aimed at reaffirming the ethical identity of the Company, making explicit the values that the Company wants to be respected in all behaviors carried out by its members.

It is by virtue of this proposal that the Company intends to reaffirm with great force that correctness and lawfulness in work and business constitute and will always constitute an essential value of this Company.

3. PRINCIPLES

3.1 General principles

PRINCIPLE 1

The Company bases its activity on the principles contained in this Code and in the Group Code of Conduct, called Business *Conduct*, adopted by all IQVIA companies.

PRINCIPLE 2

The Company has as an essential principle the respect of laws and regulations in force in all the countries in which it operates, which must be complied with by the Corporate Bodies and their members, employees, as well as consultants, coordinated and continuous collaborators, agents, attorneys and third parties acting on behalf of the Company. The violation of this principle cannot be justified even if the illicit conduct is carried out in the interest or to the advantage of the Company.

PRINCIPLE 3

The Company bases its activity on the ethical rules to which it has formally adhered and which must be adhered to by the corporate bodies and their members, employees, as well as consultants, coordinated and continuous collaborators, agents, attorneys and third parties acting on behalf of the Company.

PRINCIPLE 4

The corporate bodies and their members, employees, coordinated and continuous collaborators are required to comply with the company operating procedures.

PRINCIPLE 5

In order to allow for effective control activity on the actual application of the Model, it is expected that all Subjects are required to promptly report to the Supervisory Body if they become aware of acts, behaviors or events that may determine a violation of the Model, or which, more generally, are relevant for the purposes of Legislative Decree 231/2001. In particular, it is expected that agents, commercial partners, consultants, external collaborators and, in general, anyone who has a contractual relationship with the Company, will immediately inform the Supervisory Body of the Company in the event that they receive, directly or indirectly, from an employee/representative of the Company a request for behaviors that could determine a violation of the law, of the Group Code of Conduct (*Business Conduct*), of the Code or of the Model.

With regard to the reporting procedures to the Supervisory Body, reference is made to what is specified in the specific chapter of the Model.

3.2 Principles and rules of conduct in relations with Public Administrations

PRINCIPLE 6

The corporate bodies and their members, employees, consultants and collaborators, agents, attorneys and in general third parties who act on behalf of the Company itself in relations with the Italian or foreign Public Administration, inspire and adapt their conduct to respect the impartiality and good performance to which the Public Administration is bound.

PRINCIPLE 7

The Company condemns any conduct, carried out by the Subjects in the interest or to the advantage of the Company, consisting in promising or offering, directly or indirectly to Italian or foreign Public Officials and/or Public Service Representatives, or to natural or legal persons connected to them, spontaneously or even following induction by the same Public Officials and/or Public Service Representatives, money, services, benefits or other utilities from

which an undue or illicit advantage may be obtained for the Company.

PRINCIPLE 8

Persons appointed by the Company to follow any business negotiation, request or relationship with the Italian and/or foreign Public Administration or who in any case come into contact with the Public Administration, must not for any reason try to unlawfully influence the decisions of Public Officials or Public Service Representatives who deal with and make decisions on behalf of the Italian or foreign Public Administration. During a business negotiation, request or commercial relationship with Italian or foreign Public Officials and/or Public Service Representatives, the following actions may not be undertaken – directly or indirectly:

- propose - in any way - employment and/or commercial opportunities that could benefit Public Officials and/or Public Service Officers in a personal capacity or through a third party;
- offer money or other benefits in any way;
- perform any other act aimed at inducing Italian or foreign Public Officials to do or omit to do something to the advantage of the Company;
- offer, promise or make payments or compensation, in any form, directly or indirectly, to individuals who, exploiting or boasting of existing or alleged relationships with a public body, have money or other benefits given or promised to them, for themselves or for others, as the price of their illicit mediation with the public body, or as a price to remunerate the public body for carrying out an act contrary to the duties of office or for omitting or delaying an official act.

PRINCIPLE 9

In the context of the scientific information activity of the drug, the employees of the company and third parties who operate on its behalf must strictly comply with European and Italian laws, with the Code of Ethics of Farmindustria and with the procedures of the Company regarding the promotion of products to healthcare professionals.

In particular, it is absolutely forbidden to:

- use advertising material other than that prepared by the company holding the AIC and previously deposited with AIFA;
- promote a drug outside the therapeutic indications (off-label) listed in the approved SPC for that drug;
- promote the use of a drug, as well as unauthorized indications, dosage regimens or formulations;
- provide undocumented or undocumentable information, make exaggerated statements or universal and hyperbolic assertions, make comparisons with other drugs that cannot be demonstrated and have no evident objective basis.

Promotional material regarding drugs and their use must have a negligible perceived value, be non-fungible and in any case connectable to the activity carried out by the doctor or pharmacist. Samples must be released exclusively to doctors authorized to prescribe them to allow them to evaluate the response of their patients to the product.

It is strictly forbidden to provide samples:

- outside the limits set by Legislative Decree 219/06 and the Farmindustria Code of Ethics;
- for the doctor or pharmacist to promote or prescribe a product or to influence decisions regarding the registration or reimbursement of a product;
- for the patient's maintenance therapy;
- for the doctor's personal use.

PRINCIPLE 10

It is forbidden to maintain employment relationships, assign consultancy services or enter into contracts with former employees of the Italian or foreign public administration (or persons reported by them), in order to pay them undue compensation.

1. The evaluation of the personnel to be hired is carried out on the basis of the correspondence of the candidates' profiles and their specific skills, with respect to what is expected and to the company's needs as they result from the request made by the requesting company function and, always, in compliance with equal opportunities for all interested parties.

2. The Human Resources Function, within the limits of the available information, adopts appropriate measures to avoid favoritism or forms of clientelism in the selection and hiring phases.

PRINCIPLE 11

Third parties operating on behalf of the Company are required to refrain from maintaining relationships with the Public Administration, whether Italian or foreign, in all cases where conflicts of interest exist.

The Company may not be represented in its relations with the Italian or foreign Public Administration by third parties in a recognized position of conflict of interest, unless such situation has been adequately assessed and specifically authorized by the competent corporate bodies.

3.3 Principles and rules of conduct in the management of contributions, financing and public disbursements

PRINCIPLE 12

The destination constraint of contributions, subsidies or financing obtained from the State, the European Union, or from another Italian or foreign public body, even if of modest value, must be respected.

PRINCIPLE 13

The Company condemns any conduct aimed at obtaining, from the State, the European Community or other Italian or foreign public body, any type of contribution, financing, subsidized loan or other disbursement of the same type, by means of altered or falsified declarations and/or documents, or by omitting information due or, more generally, by means of artifices or deceptions, including those carried out by means of a computer or telematic system, aimed at misleading the granting body.

3.4 Organization principles

PRINCIPLE 14

Every operation and/or transaction, understood in the broadest sense of the term, must be legitimate, authorized, coherent, appropriate, documented, recorded and verifiable within a period of ten years. To this end:

1) the procedures that regulate the operations must allow for the possibility of carrying out checks on the characteristics of the transaction, on the reasons that allowed its execution, on the authorisations for its performance, on the execution of the operation itself;

2) any person who carries out operations and/or transactions involving sums of money, goods or other economically valuable utilities belonging to the Company must act under authorisation and provide, upon request, all valid evidence for its verification at any time.

PRINCIPLE 15

Employees and individuals who make any purchase of goods and/or services, including external consultancy, on behalf of the Company, must act in compliance with the principles of correctness, economy, quality and lawfulness and operate with the diligence of a good father.

PRINCIPLE 16

Receipts and payments must preferably be made through bank transfers and/or bank cheques, and, in any case, strictly where required by law.

PRINCIPLE 17

The Company undertakes to ensure that in its corporate organization the annual objectives set, both general and individual for managers and employees, are such as not to induce illicit behavior and are, instead, focused on a possible, specific, concrete, measurable result and related to the time expected for their achievement.

Furthermore, the Company undertakes to ensure that:

- the selection of personnel to be hired is carried out on the basis of the correspondence of the candidates' profiles and their specific skills, with respect to what is expected and to the company's needs as they result from the request made by the requesting function and, always, in compliance with current legislation (including that relating to the employment of non-EU workers) and equal opportunities for all interested parties;
- the information requested is strictly connected to the verification of the aspects foreseen by the professional profile, respecting the private sphere and the opinions of the candidate;
- the Human Resources Function, within the limits of the available information, adopts appropriate measures to avoid favoritism, nepotism or forms of clientelism in the selection and hiring phases.

PRINCIPLE 18

Each corporate function is responsible for the truthfulness, authenticity and originality of the documentation produced and the information provided in carrying out its own activities.

PRINCIPLE 19

The Company condemns the use of its resources for the financing and carrying out of any activity aimed at achieving terrorist objectives or the subversion of the democratic order, and also requires compliance with the aforementioned legislation, the internal provisions issued and the ethical principles adopted.

3.5 Principles and rules of conduct aimed at protecting health, hygiene and safety in the workplace

PRINCIPLE 20

In accordance with the current legislation on health, hygiene and safety at work, the Company undertakes to adopt all necessary measures to protect the physical and moral integrity of its workers. In particular, the Company undertakes to ensure that:

- compliance with current legislation on safety, hygiene and health of workers is considered a priority;
- risks to workers are, as far as possible and guaranteed by the evolution of the best technique, avoided also by choosing the most suitable and least dangerous materials and equipment and such as to mitigate the risks at source;
- unavoidable risks are correctly assessed and appropriately mitigated through appropriate collective and individual safety measures;
- information and training for workers is disseminated, updated and specific with reference to the task performed;
- consultation of workers on matters of health and safety in the workplace is guaranteed;
- any safety needs or non-conformities that emerge during work activities or during checks and inspections are addressed quickly and effectively;
- the organization of work and its operational aspects are carried out in such a way as to safeguard the health of workers, third parties and the community in which the Company operates.

In pursuit of the above-mentioned purposes, the Company allocates organizational, instrumental and economic resources with the aim of ensuring full compliance with current accident prevention legislation and the continuous improvement of workers' health and safety in the workplace and related prevention measures.

Given the above, all recipients of this Code must comply, in addition to the applicable regulations and internal provisions of the Company, with the following general rules:

- a) take care of your own safety and health as well as that of other people working in the same workplace (for example, respecting your work environment, keeping your workstation tidy, turning off electronic devices when you have finished using them, etc.);
- b) implement any provision, procedure and device aimed at increasing the safety and healthiness of the workplace or eliminating or reducing the risks associated with work activity;
- c) consider the Company's interest in ensuring the health and safety of workers to prevail over economic interests;
- d) assess the effects of one's own conduct in relation to the risk of accidents at work;
- e) observe the provisions given by the Employer and the RSPP for the purposes of collective and individual protection;
- f) use equipment, means of transport and other work equipment, as well as safety devices, correctly;
- g) do not remove or modify existing safety, signalling or control devices without authorisation;
- h) during visits to third parties (client companies, suppliers, etc.), follow the safety instructions given, adopt all personal protective equipment that may be necessary and not carry out, on your own initiative, operations or maneuvers that are not within your competence or that could compromise your own safety or that of others;
- i) immediately report to the RSPP and/or the Employer the need to implement provisions, procedures or devices necessary to guarantee health and safety in the workplace;
- j) immediately report dangerous situations and intervene in emergency situations only within one's own capabilities and competences.

3.6 Principles relating to cyber crimes

PRINCIPLE 21

The Company condemns any behavior consisting in the alteration of the functioning of a computer or telematic system or in the unauthorized access to data, information or programs contained therein, aimed at procuring for the Company an unjust profit to the detriment of the State or other Italian or foreign public body.

The Company also condemns any possible behavior, both by individuals who hold a top or subordinate role, that may even indirectly facilitate the commission of so-called cyber crimes; to this end, the Company undertakes to activate all preventive and subsequent control methods necessary for this purpose.

3.7 Principles relating to relationships with suppliers, customers, business partners, collaborators and, in general, third parties. Anti-money laundering and corruption between private individuals

PRINCIPLE 22

In procurement, procurement, in general, supply of goods and/or services and external collaboration (including consultants, agents, etc.) relationships, it is mandatory to observe the procedures for the selection and management of relationships with suppliers and external collaborators and to adopt in the selection, objective evaluation criteria (according to declared and transparent methods), which allow for the preventive identification of those subjects who, according to such criteria, do not possess the requirements of professional integrity necessary to maintain relationships with the Company.

The Company is committed to seeking suitable professionalism and commitment to sharing ethical principles among suppliers, consultants and external collaborators.

PRINCIPLE 23

It is mandatory to observe maximum transparency in relationships with other companies of the IQVIA Group, ensuring that each transaction with the latter is traceable, justified and documented and occurs in compliance with all applicable legislation, including tax legislation.

PRINCIPLE 24

The Company condemns any conduct, whether by individuals holding a top or subordinate role, that may even indirectly facilitate the commission of criminal acts such as receiving stolen goods, money laundering, self-laundering or the use of money, goods or other benefits of illicit origin; to this end, the Company undertakes to:

- i) adequately verify customers, keeping documentation and recording the information acquired for this purpose;
- ii) report suspicious transactions, according to the parameters dictated by the periodic anomaly indicators;
- iii) comply with the rules on the limitation of the use of cash and bearer securities, as well as the prohibition on opening accounts or savings books anonymously or under fictitious names;
- iv) monitor compliance with anti-money laundering legislation and report any infringements to the Supervisory Body and the competent Authorities;
- v) evaluate the commercial and professional reliability of consultants, suppliers and commercial/financial partners in relation to the so-called anomaly indices.

PRINCIPLE 25

It is mandatory to observe the internal precautions and procedures aimed at preventing the risk of the Company being involved, in any form, in the activities of criminal organizations, national or international, for whatever purpose they may be established.

In particular, it is forbidden to establish any working or commercial relationship with natural or legal persons who participate in any form in criminal organizations, whether national or international.

PRINCIPLE 26

In relations with third parties (natural or legal persons with whom the Company has relationships of any nature) the Subjects inspire and adapt their conduct to respect the principles of correctness, impartiality and legality.

PRINCIPLE 27

The Company condemns any conduct, carried out by the Subjects in the interest or to the advantage of the Company, consisting in promising or offering, directly or indirectly, money, services, consultancy, commercial or employment opportunities, or other benefits to third parties (e.g. mayors, auditors, liquidators, consultants, managers or employees of customers or suppliers, etc.) or to natural or legal persons connected to them, aimed at illicitly influencing their decisions or from which an undue or illicit advantage may be obtained for the Company.

3.8 Principles relating to *Corporate Governance* and to the drafting of corporate documents

PRINCIPLE 28

The Company condemns any conduct, by anyone, aimed at altering the correctness and truthfulness of the data and information contained in the financial statements, reports or other corporate communications required by law, addressed to the members, the public and the company carrying out the audit.

All the subjects called to the preparation of the above-mentioned documents are required to verify, with due diligence, the correctness of the data and information that will then be received for the drafting of the above-mentioned documents.

PRINCIPLE 29

The Company requires that the Directors, the Function Managers and the employees maintain correct and transparent conduct in the performance of their duties, especially in relation to any request made by the shareholders, the Board of Auditors, the other corporate bodies and the auditing firm in the exercise of their respective institutional functions. In particular, it is forbidden to:

- (i) engage in behaviors that materially impede, or in any case hinder, through the concealment of documents or the use of other fraudulent means, the performance of the control or auditing activity of the corporate management by the corporate bodies;
- (ii) to carry out, during meetings, simulated or fraudulent acts aimed at altering the regular process of forming the assembly's will.

PRINCIPLE 30

It is forbidden to carry out any behavior by the Directors of the Company, aimed at causing damage to the integrity of the company assets. In particular, it is forbidden to:

- (i) return contributions to members or release them from the obligation to make them, outside of cases of legitimate reduction of the share capital;
- (ii) distribute profits or advances on profits not actually achieved or allocated by law to reserves, or distribute reserves, even if not constituted with profits, which cannot by law be distributed
- (iii) carry out reductions in share capital or mergers with other companies or demergers in violation of the provisions of law for the protection of creditors;
- (iv) proceed in any way to the formation or fictitious increases of the share capital;
- (v) distribute the company assets among the members – during the liquidation phase – before paying the creditors or setting aside the sums necessary to satisfy them.

PRINCIPLE 31

The Directors must not carry out reductions in the share capital or mergers with other companies or demergers with the aim of causing damage to creditors.

PRINCIPLE 32

It is forbidden to spread false information, both inside and outside the Company, concerning the Company itself, its employees, collaborators and third parties who work for it.

3.9 Principles and rules of conduct in relations with judicial, inspection and supervisory authorities

PRINCIPLE 33

It is mandatory to collaborate with the representatives of the Judicial Authority and with any other investigative/inspection/supervisory body (e.g., Labour Inspectorate, ASL/ATS, Privacy Guarantor, Italian Medicines Agency, Ministry of Health), providing all the documentation and information requested by them in a complete, adequate and timely manner. It is strictly forbidden to engage in behaviors that may in any way hinder the regular functioning of justice. In relation to this point, it is specifically forbidden to make false statements to the Judicial Authority and/or to any other investigative/inspection/supervisory body or to engage in behaviors (e.g. characterized by violence, threats, offers or promises of money or other benefits) that may induce others to make untrue or false statements in the interest or to the advantage of the Company.

PRINCIPLE 34

On the occasion of checks and inspections by the competent public authorities, the corporate bodies and their members, the employees of the Company, consultants, collaborators, agents, attorneys and third parties acting on behalf of the Company, must maintain an attitude of maximum availability and collaboration towards the inspection and control bodies.

Transparent and responsible conduct is also required in the preparation of periodic reports and all other communications to be sent to the same authorities in accordance with the laws and regulations.

It is forbidden to hinder, in any way, the functions of the public supervisory authorities that come into contact with the Company due to their institutional functions.

Furthermore, it is expressly forbidden to promise, directly or indirectly, or provide to the aforementioned subjects benefits of any nature and origin - including personal - aimed at promoting the interests of the Company and/or interests of a private nature.

3.10 Principles relating to transnational offences

PRINCIPLE 35

The Company condemns any conduct that may even indirectly facilitate the commission of criminal acts such as criminal association, money laundering or self-laundering of goods, money or other benefits of illicit origin and obstruction of justice; to this end, the Company undertakes to activate all preventive and subsequent control methods necessary for this purpose (separation of roles, traceability of operations, selection of suppliers, monitoring of customers, employees, etc.).

3.11 Principles relating to the protection of industrial and intellectual property

PRINCIPLE 36

It is forbidden to carry out behaviors that violate or are in any way harmful to the industrial or intellectual property rights of third parties.

In particular, it is expressly forbidden to:

- (i) use, duplicate, reproduce, transmit, publish, import, distribute, sell, commercialize, or, in any other way, make use of programs, applications, logos, written works, images or other material, without a license or authorization or, in any case, in violation of the legislation protecting copyright or industrial property;
- (ii) provide means to remove or circumvent protection devices in computer programs;
- (iii) manufacture or industrially use goods or processes created by usurping or violating the industrial property rights of others.

3.12 Principles relating to the use of company information systems

PRINCIPLE 37

It is forbidden to use the Company's IT and telematic tools and services for illicit purposes. In particular, it is expressly forbidden to enter or remain within another person's IT or telematic system (in particular with regard to the telematic and IT systems of Hospitals and public bodies) abusively or, in any case, against the will of the owner.

3.13 Principles relating to human resources management

PRINCIPLE 38

The Company operates in compliance with the dignity and rights of its collaborators and requires that the management of human resources be inspired by the principles of correctness, transparency and legality.

PRINCIPLE 39

The evaluation of the personnel to be hired is carried out on the basis of the correspondence of the candidates' profiles, and of their specific skills, with respect to what is expected and to the needs of the Company, and always in compliance with equal opportunities for all interested parties.

PRINCIPLE 40

It is expressly forbidden to hire personnel without a residence permit or, in any case, in violation of the regulations on the employment of foreign citizens.

PRINCIPLE 41

All subjects involved in any way in the selection process of personnel and collaborators, suppliers and consultants, within the limits of the information available, adopt measures to avoid favoritism, nepotism or forms of clientelism in the selection, hiring and assignment of tasks phases.

PRINCIPLE 42

Any form of discrimination and harassment based on illegitimate grounds such as race, skin color, religion, nationality, sex, age, disability, marital status, sexual orientation, membership of protected categories under applicable laws is prohibited. Propaganda, incitement, incitement and dissemination of xenophobic and/or racial ideas and/or ideas based, in whole or in part, on the denial of the Holocaust, or crimes of genocide, crimes against humanity and war crimes are also prohibited.

PRINCIPLE 43

The Company ensures the protection of the confidentiality of the identity of the subjects who report illicit acts or violations of the Organizational Model pursuant to Legislative Decree 231/2001, as well as the protection of the reported subjects from acts of retaliation or discrimination due to reports made in good faith. The Company prohibits any form of retaliation or discrimination, direct or indirect, against the subjects who report illicit acts or violations of the Model, for reasons connected, directly or indirectly, to the report.

3.14 Principles relating to accounting management

PRINCIPLE 44

The Company is obliged to keep accounting records in compliance with general accounting principles (such as the principles of annuality, unity, universality, integrity, truthfulness, reliability, correctness, clarity or comprehensibility, transparency, significance or relevance).

PRINCIPLE 45

The Company requires that all persons involved in any way in carrying out activities aimed at filing the income tax return or value added tax return, or filing other fiscally relevant declarations, comply with the laws and regulations, as well as internal company procedures.

PRINCIPLE 46

It is expressly forbidden to:

- i) indicate fictitious liabilities in one of the declarations relating to income or value added taxes, using invoices or other documents for non-existent transactions, recorded in the mandatory accounting records, or held for evidence purposes against the tax authorities,

in order to evade the aforementioned taxes;

- ii) carry out objectively or subjectively simulated transactions, or make use of false documents or other means suitable for hindering the assessment and misleading the tax authorities, in order to evade income or value added taxes;
- iii) conceal or destroy, in whole or in part, the accounting records or documents which must be kept, in such a way as to prevent the reconstruction of income or business volume,
- iv) for the purpose of evading income or value added taxes or of enabling third parties to do so;
- v) issue or release invoices or other documents for non-existent transactions in order to allow third parties to evade income tax or value added tax;
- vi) to sell or carry out other fraudulent acts on one's own or other people's property in order to hinder compulsory collection procedures or other procedures by the public authority or third parties;
- vii) in order to evade, not to submit, when required, declarations relating to income tax or value added tax or withholding tax;
- viii) pay the sums due, using as compensation non-due or non-existent credits for an annual amount exceeding fifty thousand euros.

3.15 Principles relating to clinical research activity

PRINCIPLE 47

As a Company operating in the field of scientific research, both observational and interventional, for IQVIA the well-being of civil society and the improvement of the conditions and quality of life are fundamental values. These values inform all the activities and commercial initiatives of the Company and the behavior of its employees and collaborators, in the awareness that the insurmountable limit to the well-being of the company is the interest and good of the patient and, more generally, of the human being.

PRINCIPLE 48

As part of the support activity in the development and conduct of clinical studies carried out by the Company, it complies with all the standards and requirements set forth by current legislation and international conventions regarding, among others, interventional and observational clinical studies and the protection of privacy, implementing practices and procedures capable of guaranteeing the correctness, completeness and transparency of the information and data collected and processed, in order to carry out its activity in a competent and professional manner and to obtain truthful and useful results for scientific research.

Furthermore, the Company operates in compliance with the indications and *best practices* of the main international and national scientific societies and of the relevant sector associations.

PRINCIPLE 49

The Company undertakes to adopt suitable and preventive security measures for all databases in which personal data are collected and stored, in order to avoid risks of destruction and loss or unauthorised access or unauthorised processing.

Particular attention is paid to the processing of data of patients enrolled in clinical studies in which the Company is involved. A higher level of security is provided for such data, in compliance with the provisions of the applicable privacy legislation and the indications, provisions, authorizations and guidelines of the Authority for the Protection of Personal

Data.

Information to patients is provided in accordance with the provisions of the law in compliance with the principles of completeness, transparency and clarity, following evaluation by the competent Ethics Committees.

PRINCIPLE 50

The Company recognizes the crucial importance of interactions with healthcare professionals, healthcare facilities, ethics committees, health authorities and regulatory authorities in the context of interventional clinical trials and observational studies, promoting a culture of accountability and transparency.

To this end, the Company undertakes to ensure that all its employees, collaborators and all the subjects who represent it manage such relationships not only in strict compliance with current legislation, as established in the general principles, but also according to the highest standards of transparency, integrity and loyal collaboration.

In dealing with healthcare professionals, healthcare facilities, ethics committees, health authorities and regulatory authorities, the Company is committed to providing complete, correct and timely information, collaborating fully to facilitate their oversight, approval, control and monitoring functions.

4. CONTROL ORGANS AND MECHANISMS

4.1 The Supervisory Body

The Supervisory Body is responsible for monitoring and updating the Organizational and Management Model and the Code of Ethics.

- 1) The Supervisory Body, in carrying out its functions, will have free access to company data and information useful for carrying out its activities.
- 2) The corporate bodies, their members and, in general, all the Subjects are required to provide maximum collaboration in promoting the performance of the functions of the Supervisory Body.

4.2 The sanctions

Failure to comply with the principles contained in the Group Code of Conduct (*Business Conduct*), in this Code of Ethics and more generally in the Model entails the application of the disciplinary measures contained in the company's Disciplinary and Sanctioning System, within the limits and based on the specific methods provided therein.

5. THE CODE IN THE COMPANY

5.1 Knowledge

This Code of Ethics and the Group Code of Conduct (*Business Conduct*) are brought to the attention of the Subjects, who are required to learn its contents and respect its precepts.

Any doubts regarding the application of this Code must be promptly submitted to and discussed with the Supervisory Body.

5.2 Internal reporting

The ODV must be informed, through specific reports by the Recipients, regarding events

that could generate liability for the Company pursuant to the Decree.

The following must be reported to the ODV without delay:

- a) information relating to the commission, or reasonable belief of commission, of the offences to which the Decree is applicable, including the initiation of legal proceedings against managers/employees for offences provided for in the Decree;
- b) violations of the rules of conduct or procedures contained in this Model (including the Codes, procedures and other internal rules which form an integral part thereof;
- c) the offences that fall within the scope of the Whistleblowing Decree.

In implementation of the Whistleblowing Decree, the Company has established specific communication channels in order to allow detailed reports of unlawful conduct, relevant pursuant to the Decree and the Whistleblowing Decree based on precise and consistent factual elements, or violations of the Model, by individuals who have become aware of them within their working context. In particular, reports may be forwarded:

1. using the Whistleblowing Report Form (Annex 1 to Annex 8, Whistleblowing Regulation) to be transmitted:

- by registered mail with return receipt to the following address:

Attorney Giuseppe Aminzade, President of the Supervisory Body of IQVIA, Via Santa Maria alla Porta, 2, 20123 Milan - RESERVED for the attention of the President of the Supervisory Body of IQVIA;

- by email to the following address, which is accessible only by the OdV:

giuseppe.aminzade@hoganlovells.com.

IF THE REPORT IS MADE BY EMAIL, IT MUST BE SENT EXCLUSIVELY FROM YOUR PERSONAL EMAIL ADDRESS (STRICTLY NOT THE COMPANY'S).

2. By telephone contact or, upon request of the interested party, by personal interview with the lawyer Giuseppe Aminzade, President of the ODV of IQVIA, reachable by telephone at +39 02 720252251.

These channels guarantee the confidentiality of the identity of the whistleblower and of the other subjects indicated in the Whistleblowing Decree who may have had a role in the reporting process (e.g., facilitator), of the person involved or in any case mentioned in the report, of the content of the report and of the related documentation.

5.3 Changes to the Code

Any modification and/or addition to this Code must be made using the same methods adopted for modifications to the Model.

6. GLOSSARY

"Decree": Legislative Decree 8 June 2001, n. 231 and subsequent amendments and additions, containing the rules on the administrative liability of legal persons, companies and associations, including those without legal personality, pursuant to Article 11 of Law 29 September 2000, n. 300.

"Whistleblowing Decree": Legislative Decree 24/2023, as subsequently amended and integrated.

"Recipients": the members of the corporate bodies and of the assembly, as well as, more generally, all the employees and collaborators of the Company in addition to the commercial partners, pursuant to specific clauses that will be included in the contracts and limited to the performance of sensitive activities in which they may participate

“Code of Ethics”: this Code of Ethics;

“Organization and management model (or also the “Model”)”: The set of procedures and tools that the Company has adopted in its corporate organization.

“P.A.”: the Public Administration, Public Officials and Public Service Officers, Italian and foreign, understood in the broadest sense.

“Public official”: the person who exercises a public legislative, judicial or administrative function. The administrative function is public when it is governed by public law provisions and by authoritative acts and is characterised by the formation of the will of the PA by means of authoritative or certifying powers. Article 357 of the Criminal Code defines the public official as the person who “exercises a public legislative, judicial or administrative function”. The administrative function is public when it is governed by public law provisions and by authoritative acts and is characterised by the formation and manifestation of the will of the Public Administration or by its performance by means of authoritative or certifying powers”. Public law provisions are those that are aimed at pursuing a public purpose and protecting a public interest. Authoritative power is that power that allows the PA to achieve its goals by means of actual commands, with respect to which the private individual is in a position of subjection. This is the activity in which the so-called “authoritative power” is expressed. power of imperium, which includes both the powers of coercion (arrest, search, etc.) and of contesting violations of the law (verification of contraventions, etc.), as well as the powers of hierarchical supremacy within public offices. The power of certification is that which attributes to the certifier the power to attest to a fact which is proven until a complaint of forgery is filed.

“Person in charge of a public service”: he who, in any capacity, carries out a public service, that is, an activity regulated in the same way as a public function, but without the exercise of authoritative or certifying powers. Article 358 of the Criminal Code defines the person in charge of a public service as the one who “in any capacity provides a public service”:

“In any capacity ” must be understood in the sense that a person exercises a public function, even without a formal or regular investiture (charged with a “de facto” public service). In fact, the relationship existing between the Public Administration and the person who performs the service is irrelevant.

By **“Public Service”** we mean an activity governed by public law and authoritative acts, but characterized by the lack of authoritative and certification powers. By way of example, the following hold the qualification of Public Official and Person in Charge of Public Service: Doctor on call; Doctor contracted/employed by the SSN; Contracted specialist; University employees; Member of the ASL/Ministry/Regions Tenders Commission; Military personnel of the Guardia di Finanza or NAS; Military personnel of the Carabinieri; Municipal Police.

“Foreign Public Officials”: any person who carries out a legislative, judicial or administrative function on behalf of the European Union or the State to which he belongs or who is considered a “public official” according to the rules of the legal system to which he belongs. (e.g.: agents or employees of a foreign State, persons belonging to an international organisation, etc.).

“Company”: IQVIA Solutions Italy S.r.l.; IQVIA RDS Italy S.r.l.; IQVIA CSMS GmbH; Educom S.r.l..

“Subjects”: directors, managers, employees, consultants, collaborators, customers, agents and attorneys of the Company, as well as third parties who act on behalf of the Company or have any commercial or collaborative relationship with the latter.