

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
4	Compliance Program Guiding Principles
5	Introduction

Ownership

7	Who Does the Code Apply To?
7	What is Expected of Me?
8	Additional Responsibilities as a People Leader
8	Ethical Decision-Making Guide

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

Teamwork

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

Excellence

16	Fair Competition and Fair Dealing
17	Business Courtesies, Gifts 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
22	Prohibitions Against False and Fraudulent Claims
22	Record Keeping and Retention

Integrity

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

Inspiration

28	Human Rights
29	Public Service and Political Contributions
29	Environment, Health and Safety
30	Waivers of or Changes in The Code of Conduct and Ethics
30	Administration
30	Contacts and Resources



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

Dear colleagues,

Labcorp’s response to the extraordinary events of the last two years has demonstrated the value and importance of our strengths in science, innovation and technology. These strengths enabled our teams to advance our mission to improve health and improve lives at a time when the world needed us most.

Our unwavering commitment to operating with the highest level of ethics and integrity is foundational to delivering on our mission. I am proud of the examples I see every day – being an inclusive workplace, supporting doctors in their care for patients, managing clinical trials with the highest scientific standards, treating each patient with respect, pioneering the next diagnostic test or technology and more.

Our commitment to operating with ethics and integrity is embodied in the standards outlined in our Code of Conduct and Ethics. Each of us has an important role in carrying out our Code of Conduct and Ethics through our actions, and can do so by following these essential steps:

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

As a leading global life sciences and healthcare company, Labcorp’s success is built on the trust we earn by doing the right thing in the right way, even when it may seem difficult. Each of us has a responsibility to prioritize, adopt and adhere to our Code of Conduct and Ethics and demonstrate our respect for each other as well as our patients, customers, shareholders and the communities where we conduct business around the world.

Thank you for your commitment to strengthening Labcorp’s culture and operating with the highest ethics and integrity.

Sincerely,

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 all employees, officers and directors, as well as contingent workers, independent contractors, suppliers, vendors, student interns, business partners and representatives who work on Labcorp's behalf to do the same. This Code of Conduct and Ethics (Code) is intended to serve as a guide to help us make the right choices and decisions consistent with the highest ethical standards.

Labcorp provides vital information in pursuit of answers to help doctors, hospitals, pharmaceutical companies, researchers and patients. We know our work matters and we strive to attain ethical excellence. Labcorp is a leading global life sciences company with more than 70,000 employees, serving customers in more than 100 countries. Labcorp is diverse in thought, customs, people and cultures. We strive to work openly, collaboratively and together 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, 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 is designed to **(1)** promote honest and ethical conduct, **(2)** address compliance with applicable governmental laws, rules, and regulations, **(3)** deter wrongdoing, and **(4)** foster full, fair, accurate and timely disclosure of concerns or violations. Everyone at Labcorp has a duty to adhere to 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 What is Expected of Me?
- 8 Additional 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 and directors, as well as contingent workers, independent contractors, suppliers, vendors, student interns, business partners and representatives who work on Labcorp's behalf. Each of us is required to read, understand, and follow all relevant Labcorp policies and procedures and this Code. Compliance is everyone's responsibility.

What is Expected of Me?

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 exercise good judgment. If you observe or are asked to do something that seems improper, unlawful, or contrary to Labcorp policies or procedures, speak to the appropriate person, 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 discharge 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.



Additional Responsibilities as a People Leader

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

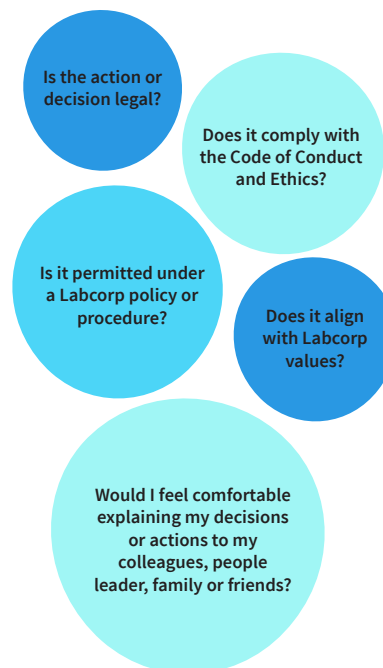
- Act as a role model by demonstrating ethical conduct including the standards in this Code;
- Communicate the importance of this Code to employees reporting to you and make sure they understand their responsibilities;
- Foster an environment where employees are comfortable asking questions and are supported when speaking up;
- 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; and
- 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 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 Corporate Compliance Department, Law Department or 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 mAPS or AskHR;
- Contact the Law Department, the Corporate Compliance Department or Corporate Internal Audit;
- Speak with anyone else on the management team; or
- 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](https://labcorp.ethicspoint.com), or via phone using one of the numbers listed on the online portal.

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.
- Refrain from conducting 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 or undocumented 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; and/or
- 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 prohibit discrimination in employment, employment-related decisions or in business dealings on the basis of an individual's race, color, national origin, ancestry, nationality, citizenship, religion, creed, age, sex (including pregnancy), marital or familial status, sexual orientation, gender identity and/or expression, military service/veteran status, disability, matriculation, political affiliation, genetic information, immigration status, or any characteristic protected by applicable law (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 [mAPS](#) or [AskHR](#):

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 [mAPS](#) or [AskHR](#)

Excellence



- 16 Fair Competition and Fair Dealing
- 17 Business Courtesies, Gifts 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 Prohibitions Against False and Fraudulent Claims
- 22 Record Keeping and Retention



The Way We Do Business

Fair Competition and Fair Dealing

We compete fairly and honestly. Labcorp complies with all applicable antitrust and competition laws. These laws are intended to foster competition and encourage Labcorp and its competitors to compete fairly and aggressively in the marketplace. We seek competitive advantages through superior performance, never through unethical or unlawful business practices. You should be particularly aware of these laws 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 inducing disclosures of trade secrets by past or present employees of other companies is prohibited. You must endeavor to respect the rights of, and to deal fairly with, Labcorp's customers, suppliers, competitors and their affiliates and employees.

You should never take unfair advantage of anyone through:

- Manipulation;
- Concealment;
- Abuse of confidential information;
- Misrepresentation of material facts; or
- Any other intentional unfair dealing or practice.

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.



Business Courtesies and Gifts

The purpose of business entertainment and gifts in a commercial setting is to create goodwill and sound working relationships, not to gain an unfair advantage. Labcorp is prohibited from offering or providing any sort of payment, gift, or any other compensation to influence the outcome of any third party's decisions. This includes providing something of value to health care providers to influence them to refer or prescribe treatment (whether provided by Labcorp or by its pharmaceutical and device company customers). Any such gifts or entertainment to, from, or for third parties should be consistent with the Labcorp Client and Third Party Expenses Policy and in accordance with applicable laws and regulations.

Courtesies and Gifts may be accepted if:

- It is legal;
- It is not cash or cash equivalent (i.e., gift card);
- It is reasonable or of nominal value;
- It is offered in a transparent manner; and
- It has a primary business purpose.



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."



A vendor wants to take me to lunch. Can I attend?

Yes, so long as the invitation is reasonable, open, transparent and is not intended to influence or appear to influence your business decisions. As a best practice, the discussion should take place at a moderately priced restaurant or venue suitable for business discussions. Be clear with the vendor about Labcorp policy limitations on acceptable meals and entertainment.

I am having lunch with a client to discuss potential business opportunities and want to treat the client to a round of golf after the meeting. Is this permitted?

Labcorp may not provide or pay for any hospitality (including recreational activities) for any client or third party, regardless of (1) the value of the activity or (2) whether the recreation is secondary to the scientific, business or educational purpose, unless pre-approval is obtained from the Chief Compliance Officer.

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 only access personal information of others 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 Chief Privacy Officer, 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 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. Acceptance of gifts and entertainment;
5. Direct or indirect supervision of, or negotiation with, family members and others with whom you have a close personal relationship; or
6. Taking of 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.



What should I consider if I want to run for political office?

- You may not use Labcorp’s name.
- You may not commit Labcorp funds to your campaign.
- Be clear that any communication (including statements made on social media) is your view as an individual and not expressed as a Labcorp employee.
- Seek approval from the Corporate Compliance Department before SEEKING or ACCEPTING a nomination or appointment to any public office.
- Notify the Labcorp Global Government Relations and Public Policy Department.

What should I consider if I want to participate on an Advisory Board?

- Do your personal interests obstruct or conflict with Labcorp’s opportunities or business?
- Is the opportunity with a current or potential supplier, vendor, customer or competitor?
- Is there compensation?
- Do you have the time to commit to the Board outside of your work hours for Labcorp?
- Do you have decision making authority or responsibilities that could impact either Labcorp or the Advisory Board Company if it were to compete or engage with Labcorp?

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 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.

DO:

- Repost, retweet, or promote information shared from verified Labcorp social networking sites
- Share career opportunities with personal and professional social connections
- If you are unsure about posting, ask for clarification by connecting with the [Social Media team](#)

DO NOT:

- Post personal information relating to patients, employees, customers or other individuals;
- Post content found on any internal networks or sources if not publicly available;
- Post photos or videos that contain any customer or patient images, personally identifiable information, PHI, confidential information or content that would violate Labcorp policies.



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

[Media Inquiries and Press Release Policy](#)
[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 would violate 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.”

Prohibitions Against 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. Specifically, in the United States (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 for such acts. 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 not only to billing government health care programs and other third party payers for health care services but also to billing of customers for clinical trial testing and other services provided by Labcorp.

For More Information

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



Record Keeping and Retention

Labcorp requires honest and accurate 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 e-mail, 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"



I think I made an error on my expense report. What should I do?

You need to correct the expense report. Contact your people leader or local controller to discuss how to correct. Even small errors can be red flags to auditors and regulators.

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 inside or non-public information about Labcorp; and
 - Competitor, supplier, vendor or client stock while aware of inside 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; and
 - 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.

International Trade and Sanctions

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. 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—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 may be restricted.
3. Anti-Boycott regulations—Refrain from cooperating in boycotts that the U.S. government does not support, for example, a client refuses to do business with Labcorp because Labcorp will not boycott Israel.
4. Other import and export laws and other regulations may exist to restrict trade with certain countries.

For More Information

[Labcorp Diagnostics National Office of Quality](#)

[Labcorp Drug Development Quality](#)

[Code of Respect for Animals in Research and Development \(BPM-LEG-P-LG-012\)](#)

[Principles for Reporting and Investigating Animal Welfare Concerns \(BPM-LEG-P-LG-011\)](#)

[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. Derived from the principles and guidance of the United Nations, the International Labor Organization and the Organization for Economic Cooperation and Development, Labcorp operates under programs and policies that:

- 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; and
- 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 \(BPM-18\)](#)

[Combating 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; and
- 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

General Email Addresses:

- HIPAA/US Privacy matters
- Global Privacy matters
- All other matters

The Privacy Office

Drug Development Law Department

Corporate and Diagnostics Law Department

Securities Compliance Officer

OIS mission:SAFE

Resources:

AskHR

mAPS

The Point—Enterprise Policies

Office of Information Security

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

