



Business Code of Conduct

1. Purpose

This Business Code of Conduct details the responsibilities and expectations that we hold for our Associates, Vendors/Suppliers, Contractors, Subcontractors, and Agents (which we collectively refer to as “Business Partners”) in conducting legal and ethical business transactions as well as how NAMSA ensures potential conflicts of interest are avoided. To the extent that NAMSA has entered into a specific agreement and/or contract with any of the parties, that agreement and/or contract shall govern the relationship between the parties, in addition to this Business Code of Conduct.

2. Scope

Our core values are fundamental to the way we operate and we aim to cultivate relationships with Associates and Business Partners who share in our passion for excellence and ethics. In this regard, the scope of this document applies to all of our Associates and Business Partners. This Code provides general principles and information to Business Partners on their basic legal and ethical responsibilities. This Code is not intended to address every situation or set forth every rule, procedure or policy of NAMSA, and it is not a substitute for the responsibility of each Associate or Business Partner to exercise good judgment and common sense.

3. Applicable Documents

- GNQS-PD-00001, Data Integrity Process
- GNQS-POL-00003, Data Privacy Compliance
- ISO 17025:2017 General requirements for the competence of testing and calibration

4. Responsibilities

Role	Responsibilities
All Business Partners	Adhere to the Business Code of Conduct.
All NAMSA Associates	Adhere to the Business Code of Conduct. Report issues discovered to Management, Human Resources or the NAMSA Values Line.
Laboratory Managers	Ensure impartiality in the reporting of laboratory results.
Quality Assurance	Facilitate review of impartiality risks at management review meetings in laboratories with 17025 accredited methods.

5. Special Instructions

- 5.1. If at any time a NAMSA Associate does not feel comfortable reporting potential Business Code of Conduct violations or other ethical issues to their Management or Human Resources, the NAMSA Values Line may be called at **1-800-573-2201**. The NAMSA Values Line is a toll-free, confidential method to report behavior or practices that potentially affect the integrity of the work we do.
- 5.2. In order to exercise rights under a NAMSA privacy notice or applicable data protection laws, any Associate or Business Partner may send an e-mail to privacy@namsa.com.

6. Definitions

Refer to GLOSSARY_00001, NAMSA Terminology Glossary.

Term	Definition
ALCOA	An acronym associated with data integrity. It stands for the following compliance terms: attributable, legible, contemporaneous, original, and accurate.

Term	Definition
Conflict of Interest	Any influence that might adversely affect the conduct of an Associate or Business Partner's activities or a laboratory's operations, or a situation in which a person is in a position to derive personal benefit from actions or decisions made in their official capacity.
Impartiality	Impartiality is defined by ISO as the presence of objectivity. Objectivity, in turn, means that conflicts of interest do not exist or are managed such that conflicts do not adversely impact operational activities. Impartiality also means that personnel are able to carry out operational activities free from the influence of any individual or organization that has a vested interest in the outcomes.

7. Laws, Regulations and Contractual Obligations

- 7.1. At a minimum, NAMSA expects Associates and Business Partners to perform all duties, services and contractual obligations in compliance with all laws and regulations applicable to their business. In addition, they must comply with the Terms and Conditions and other provisions specified in any Contracts and Agreements entered into with NAMSA.

8. Labor Practices

- 8.1. All NAMSA Associates are entitled to work in a supportive and mutually beneficial environment, and NAMSA expects that all Business Partners provide the same for their Associates while adhering to all appropriate labor laws and regulations as well as the conventions of the International Labor Organization (ILO). The following requirements are upheld by NAMSA and are expected of all Business Partners:

8.1.1. Freely Chosen Employment

Employment must be freely chosen. Forced or bonded labor, human trafficking, forced prison labor, or involuntary labor through threat, force, coercion, confiscation of government identification, or fraudulent claims are all strictly prohibited.

8.1.2. No Child Labor

Child labor must not be used. They must only employ Associates that are at or above the minimum legal age for employment in each country where they operate and avoid employment that may be mentally, physically, socially, or morally dangerous to children, which by its nature or as a result of the circumstances in which it is carried out, is likely to jeopardize the health and safety of young persons.

8.1.3. Non-Discrimination

Existing and prospective Associates are treated fairly, and are not discriminated against on the basis of race, color, descent, religion or belief, political opinion, national or ethnic origin, nationality, sex, pregnancy, age, disability, health, physical or genetic characteristic, sexual orientation, gender identity, marital status, military service, membership of a union or any other status protected by law.

8.1.4. Respect and Dignity

Associates are treated with respect, and any forms of corporal punishment, threats of violence, verbal, physical, or visual abuse, or other forms of mental, sexual, or physical coercion or harassment are actively deterred and prohibited.

8.1.5. Labor Laws

Compliance to all applicable labor laws (including any applicable collective bargaining agreements), particularly those related to wage, vacation and working hour regulations, as well as those in relation to the occupation of foreign workers, the use of such works or providing workers to third parties is upheld.

8.1.6. Employee Privacy

Only personal information on employees needed for effective operation or as required by law must be collected and retained. All information collected is to be kept confidential and released only to those with a legitimate need to know or where explicit consent has been provided.

9. Safety Practices

9.1. NAMSA and Business Partners take precautions in regards to the safety of their Associates and take responsibility for keeping themselves and each other safe, secure and healthy in the workplace.

9.1.1. Safety Standards

As NAMSA does, Business Partners must make efforts to institute best practices in regards to safe working environments for its Associates. These environments will fully comply with all safety and health laws, regulations, and practices, including those applicable to the areas of occupational safety, emergency preparedness, occupational injury and illness, industrial hygiene, physically demanding work, and machine safeguarding. Appropriate steps must be taken to minimize the causes of hazards in the workplace.

9.1.2. Training

NAMSA and Business Partners will provide adequate training for Associates on applicable workspace safety practices mandated by local, state and federal regulations. Such practices should be designed to help prevent accidents and injuries.

10. Environmental Practices

10.1. NAMSA is responsible for minimizing the environmental impact of our operations. We conduct our business so that it meets or exceeds all applicable laws and regulations and minimizes risk to our Associates, the public and the environment. We expect that our Business Partners share in this undertaking as well.

10.1.1. Environmental Laws

Business Partners must comply with all applicable environmental laws and regulations regarding hazardous materials, waste and wastewater discharges, air emissions, etc.

10.1.2. System Improvement

NAMSA actively pursues ways to minimize its environmental footprint, and we expect Business Partners to do the same. Business Partners are encouraged to identify and adopt environmental best practices into their business processes, particularly those that reduce waste, air emissions, and energy costs. Any risk that could negatively impact the natural environment, as well as the health and rights of individuals and communities, should be mitigated.

11. Fair Business Practices

11.1. NAMSA competes energetically and honestly for business. Our success is attributed to our ability to implement innovative ideas and processes that bring value to clients, and never through inappropriate conduct in the marketplace. As part of our commitment to ethics, NAMSA requires that its Business Partners maintain the same ethical business standards of operation, as described below.

11.1.1. Fraud and Corruption

NAMSA is committed to conducting its business honestly and free from extortion, bribery, and all unlawful, unethical, deceptive or fraudulent activity. Business Partners must follow all applicable anti-corruption laws and regulations. Any forms of bribery, kickbacks, corruption, extortion, voluntary untruths, or embezzlement are prohibited. Business Partners are expected to institute adequate procedures to prevent the aforementioned activities.

11.1.2. Gifts

While relationship-building is beneficial to all parties involved, Business Partners should be wary of attempting to give gifts to NAMSA Associates, contractors and subcontractors. Even well-intentioned gifts may constitute a bribe in certain circumstances, or create a conflict of interest. Business Partners should not offer anything of value in order to obtain a benefit or advantage, and must not offer anything that might appear to influence, compromise the judgment of, or obligate a NAMSA Associate, contractor or subcontractor, as they are not permitted. Gifts of nominal value are permitted.

11.1.3. Conflicts of Interest

NAMSA puts company goals and client interests before personal gain to promote unbiased, smart decisions that benefit all as detailed in section 13. Business Partners should avoid conflicts of interest, or even the appearance of a conflict of interest. A conflict of interest occurs when a person has a personal interest or is involved in an activity that could interfere with such person's ability to perform tasks in an objective, impartial and effective manner. All actual and apparent conflicts of interest between NAMSA and its Business Partners shall be reported to NAMSA prior to entering into any business transaction.

11.1.4. Insider Trading

NAMSA Associates and Business Partners must ensure that non-public information obtained over the course of their relationship is not used for personal benefit or to advise others ("tipping").

11.1.5. Export/Import Controls

As NAMSA practices, Business Partners will also comply with all applicable laws and regulations governing the import, export and re-export requirements and restrictions of domestic and foreign origin parts, components and related technical and personal data.

11.1.6. Record Retention

Business Partners must honestly and accurately keep records of all pertinent business information and comply with all applicable laws and regulations regarding their completion, accuracy and retention. Accounting records must, in reasonable detail, accurately and fairly reflect transactions, assets, liabilities, revenues and expenses. Participation in money laundering or the financing of terrorists or criminal activities in any way is strictly prohibited. To the extent that any of these records contain personal data, Business Partners must comply with all applicable data protection laws, as outlined in the Terms and Conditions.

11.1.7. Fair Competition

NAMSA will only seek competitive advantage through fair and lawful means. Our Business Partners must not engage in collusive bidding, price fixing, price discrimination, or other unfair trade practices in violation of fair competition laws or antitrust laws that govern their jurisdiction.

11.1.8. Confidentiality/Intellectual Property

- 11.1.8.1. Business Partners will respect the intellectual property and confidentiality rights of others. In particular, Business Partners will protect and responsibly use the physical and intellectual assets of NAMSA, when given written permission to use said assets.
- 11.1.8.2. If NAMSA Associates must transmit intellectual and confidential property, Associates must use approved systems and tools (refer to GNQS-POL-00003).

12. Right to Monitor, Audit and Terminate

- 12.1. In the event that NAMSA becomes aware of any actions or conditions that violate our Business Code of Conduct, we will request that appropriate corrective actions be taken. In the event that appropriate corrective actions are not taken, NAMSA reserves the right to terminate any business relationship without judicial intervention and without any indemnity being due.

13. NAMSA Impartiality Risks

- 13.1. NAMSA has structured its clinical operations, consulting services and laboratory operations to avoid potential conflicts of interest in the management of its businesses. This structuring also ensures that laboratory and clinical study results are objectively reported, with impartiality.
- 13.2. The following areas have been identified as having a potential impartiality risk. These risks are reviewed on an ongoing basis through the management review process.

Potential Conflict	Description
Legal Entities	NAMSA has ensured clear separation between legal entities where required by country-specific laws.
Organizational Structures	Clinical, Consulting and Laboratory personnel have separate operational reporting structures up to the level of the CEO.
Consulting Activities	When NAMSA consultants recommend testing to be conducted on a client's device, it must be clear that the client may determine where this testing is completed.
Laboratory Activities	<ul style="list-style-type: none">Laboratory management is responsible for the impartiality of its laboratory activities and shall not allow commercial, financial or other pressures to compromise impartiality.Data integrity practices are implemented in each laboratory per GNQS-PD-00001 to ensure all results meet good data integrity practices that support ALCOA elements.
Sales Activities	Laboratory management receives no monetary incentives or commissions based on laboratory sales volume.
Associate Relationships	Associates who have close personal relationships (immediate family or marital/domestic partnerships) shall not have direct organizational reporting structures or direct oversight/approval of each other's reports or results (e.g. nonconformance report or laboratory result approval).

Revision Change History

Rev.	Description of Change	DCR Initiator	DCR#	Effective Date
A	Initial Release	Jacqueline Torfin	DCR-0053	22 MAY 2018
B	Added instructions to ensure Associates maintain confidentiality when transmitting information, per GNQS-POL-00003.	Melissa Cadaret	DCR-0209	02 JUL 2020