

Code of Business Conduct and Ethics

Eurotrials
Scientific Consultants

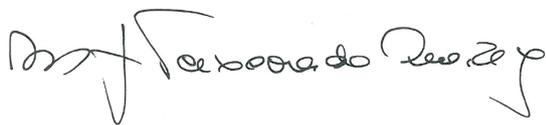
Dear Colleagues

Eurotrials and its employees and associates are committed to observing all the applicable laws and regulations always following the highest standards of good business conduct and ethics and defend Eurotrials' reputation for integrity and fairness in all its dealings.

This code sets forward our key principles of business conduct and ethics that all individuals in our organization have to comply with.

Any questions regarding these principles, their applicability or potential acts of misconduct should be discussed with the respective managers, Quality Assurance and/or Human Resources Supporting Units.

Sincerely,



Maria João Queiroz
Global CEO



Our commitment and values

Eurotrials has, and will continue to uphold, the highest levels of business ethics and personal integrity in all types of transactions and interactions in the countries where it conducts business.

As a company, we work together across geographies to meet our clients' needs and provide services aligned with the most current laws and governing regulations in each country where we operate.

Innovation

In a borderless business world we are keen to position ourselves as a global partner, promoting industry-leading solutions.

Partnership

We are determined to nurture meaningful and collaborative relationships with stakeholders.

Excellence

We are dedicated to deliver a best in class service and to support our performance on the path to success.

Determination

We are focusing our efforts on the establishment of a sustainable business growth and performance achievements.

Commitment

We are entirely oriented to consistently delivering added value, by advancing collective goals.

Scope and applicability

The Code of Ethics and Business Conduct is endorsed by the Board of Directors of Eurotrials and it is aligned with the company mission and vision and applicable legal requirements, regulations and industry codes.

This code is implemented in all Eurotrials subsidiaries and applies to all employees and business partners to whom it is distributed, all referred hereinafter as “Covered Parties”.

The Code of Business Conduct and Ethics serves as a guide to:

- 1 Emphasize Eurotrials’ commitment to ethics and compliance with legal and other business requirements and regulations;
- 2 Describe basic standards of ethical and legal behaviour for Covered Parties and third parties, as applicable, including:
 - A A guide for the decision-making process, to promote accountability and autonomy and help prevention and detection of wrongdoing; it also establish reporting mechanisms for known or suspected misconduct, including ethical or legal violations;
 - B Protection of intellectual property of all parties in what regards to confidential information of Eurotrials employees and business partners;

3 Safeguard the personal data review and processing to guarantee maximum compliance with legal and business partners' data privacy requirements (for employees, partners and study subjects) and emphasize the focus on a Business Continuity Management attitude;

4 Describe Eurotrials' commitment to Social Responsibility.

When confronted with ambiguous situations, the Covered Parties should remember Eurotrials' commitment to the highest ethical and legal standards and seek advice from supervisors, managers or other appropriate personnel (namely Quality Assurance and/or Human Resources Supporting Units) to ensure that all actions taken on behalf of Eurotrials honour this commitment.

Standards to be followed

1 Business excellence

1.1. Our People

The company's success stands on pillars that have marked its personality since it was founded: **creativity in finding solutions, unique technology, multidisciplinary expertise, solid experience and quality.**

Eurotrials has a team of young, diversified and motivated employees that are continuously trained to maintain these business gold standards and meet our stakeholders' requirements.

All employees have the obligation to comply with this code standards, notably acting with honesty, integrity and dignity avoiding any personal and professional conflict of interests.

1.2. Decision-making process

Eurotrials employees are trained on applicable topics and closely followed by a manager (process-oriented).

During their daily practice activities they are encouraged to take ownership in the decision making process. Proactivity/objectivity in assessing risks and finding best possible solutions before taking actions or escalating possible issues is recognized as a best practice within the company (risk-oriented decision).

Employees must always exhibit the highest standards of integrity and professionalism. Questions such as:

is it correct, is it ethical and is it sensitive data/information are to be considered during the decision making process. Whenever advice is needed for professional judgement, the manager, the Quality Assurance Support Unit or Human Resources should be contacted. This same escalation pathway should be used to conscientiously report unethical or misconduct behaviours.

1.3. Privacy & Confidentiality

Eurotrials employees must always safeguard the principles of data privacy while reviewing and processing personal data. These principles apply to employee, clinical subject, client and all other parties' personal information. Any risk or breach will be investigated for process improvement and, if need, a corrective action/preventive action plan will be in place.

All non-public information about the company should be considered confidential information, including all the information that Clients have entrusted Eurotrials. When joining the company, Eurotrials collaborators are requested to sign a Confidentiality Agreement.

The obligation to preserve confidential information continues indefinitely even after employment ends.

Unauthorised use or disclosing of confidential information violates the Company's code and it may result in disciplinary, civil or criminal penalties. Covered Parties must maintain the confidentiality of the information entrusted to them, except when disclosure is authorised by an appropriate legal officer of Eurotrials or required by laws or regulations.

Proprietary information of Eurotrials include, among others, protocols and other technical documents, procedures and methodologies, databases, records, business and marketing plans and human resources sensitive information.

Whenever Eurotrials brand is represented (logo, materials, productions) in communications with other stakeholders, Eurotrials' proprietary information and official image must be always preserved & protected by following the Brand Manual indications for brand protection.

1.4. Conflicting Activities

Prior to accepting any services from clients Eurotrials shall run a conflict of interests check. In case no conflict of interests is deemed as existing, Eurotrials may carry out the services within its business activity.

All clients are entitled to the equal treatment and assistance and no employee may give any preferential treatment to a client over another client.

Eurotrials also undertakes to assure strict confidentiality regarding each clients' information and data.

Confidential information regarding each client shall only be disclosed to employees that need such information in order to perform their jobs.

2 Business Integrity Anti-bribery Code

The purpose of business hospitality, entertainment and gifts in a commercial setting is to create goodwill and sound working relationships, not to gain unfair advantage with other parties or to gain anything in return.

No gift or entertainment should ever be offered or accepted by a Covered Party unless it:

- 1 Is consistent with customary business practices;
- 2 Is not excessive in value,
- 3 Cannot be construed as a bribe or payoff
- 4 Does not violate any laws or regulations.

The offer or acceptance of valuable gifts or cash gifts by any Covered Party is strictly prohibited.

These principles should also be enforced in the daily dealings with Eurotrials subcontractors.

Covered Parties should discuss with their supervisors, managers or other appropriate personnel any gifts or proposed gifts which they think may be inappropriate and should also report all potential acts of misconduct.

3 Risk Assessment & Continuous Improvement Mind-set

Eurotrials is always concerned with potential risks to its operation and stimulates this attitude within the organization.

The Business Continuity Management System (BCMS) is part of the overall Eurotrials' management system and it prepares the organization to respond adequately in the event of extended service outages, caused by factors beyond our control (e.g. natural disasters, man-made events).

Eurotrials' directors and managers should be aligned with Eurotrials' BCMS documents and all staff should be trained and aware of the Business continuity Plan (BCP) in place for the applicable country.

The training schedule may include some exercises covering specific parts of the overall plan, to analyse and improve this particular component. This training Exercises are the key for a successful implementation of the plan during an emergency situation.

4 Social Responsibility

Eurotrials believes that social responsibility is an obligation, and so the company feels the need to practice it in many ways:

- **Energy Savings**

The company is concerned with saving energy, minimising and recycling waste and preventing pollution.

It also organises the recycling and reuse of paper and the separation of refuse.

- **Social Support**

Every year, Eurotrials supports a social organization, namely fire fight associations, or children/elderly support organizations.

- **Quality Records**

Eurotrials has a procedure for the handling of complaints. It collects and processes feedbacks received from Clients pursuant to legal rules.

- **Publications**

It produces and publishes didactic material on health, which is distributed free of charge and sponsors technical publications, such as "*Guia Prático Climepsi de Estatística em Investigação Epidemiológica: SPSS*" and "*Saúde em Mapas e Números*", a free newsletter Bulletin with health data.

5 Implementation

This Code was issued on 30th September 2015 and it will enter in force one month after its release, therefore 30th October 2015. All Covered Parties must read this document and record the corresponding training in the applicable training records.

It is each Covered Party's responsibility to perform the training and ensure its applicability on daily activities. Eurotrials' Directors and other applicable Managers have additionally the responsibility of ensuring the implementation of this code within his/her area of responsibility.

www.eurotrials.com

Portugal

Rua Tierno Galvan, Torre 3, Piso 16
1070-274 Lisboa, Portugal
T. (351) 21 382 54 40
F. (351) 21 382 54 52
office@eurotrials.com

Brazil

Al. Santos, 787 conju 31, Cerqueira César
01419-001 São Paulo, Brazil
T. (5511) 3842 6888
F. (5511) 3842 6797
office.brasil@eurotrials.com

Argentina

Av. Cerviño 4407, Piso 4to B
CP1425
Buenos Aires, Argentina
T. (5411) 4535 2051
office.argentina@eurotrials.com

Chile

Cerro El Plomo nº 5420, Piso 13, Of. 1305
Las Condes - Santiago, Chile
T. (562) 261 615 19
F. (562) 261 615 01
office.chile@eurotrials.com

Spain

Paseo de la Castellana, 177 - 7 d 1
28046 Madrid, Spain
T. (34) 62 88 73 610
office.espana@eurotrials.com

Mexico

Bosques de Duraznos 65, Piso 1 - 103
C.P. 11 700 México D.F. Bosques de la Lomas
CP 11590 México, D.F.
T. +52 5596 4269
office.mexico@eurotrials.com

Eurotrials
Scientific Consultants