

CP 817-03

Speak Up Program

Corporate Policy

1. Scope

This Policy applies to Parexel, its subsidiaries and affiliates, and all directors, officers, employees, contractors, agency workers, and third parties conducting business on behalf of Parexel (“Representatives”).

2. Policy Statement

Parexel encourages a culture of openness and urges its Representatives to raise any concern they may have in relation to how Parexel operates as a business. If there is any practice or behaviour that you believe may be contrary to our Code of Conduct, other Parexel policies, or may constitute an unlawful activity, please escalate your concerns using the procedures set out in this policy.

3. Retaliation

As stated in our Code of Conduct, Parexel is committed to fostering an open reporting environment in which every Representative feels free to raise or elevate concerns about compliance with Parexel policies or applicable laws and regulations without fear of retaliation. Parexel has a zero-tolerance policy with respect to any form of retaliation. Retaliation of any kind, direct or indirect, is strictly prohibited against anyone raising a good-faith concern using the process set out in this policy or who participates in an investigation into such concern.

4. Bad Faith Allegations

Parexel has zero tolerance for false claims or allegations made in bad faith by any employee against another individual. Individuals who engage in bad faith allegations are subject to disciplinary action, up to and including termination of employment or termination of the business relationship.

5. Reporting

Each of us has an obligation to ask questions, seek guidance and speak up and share our concerns when we observe or suspect that something is illegal, inappropriate, or violates our Code of Conduct or other Parexel policies, or applicable laws and regulations.

You may notify your immediate manager, your manager's supervisor, your Human Resources (HR) team, the Legal and Risk Management Department (LRM), Internal Audit (IA), or the Compliance Department at Compliance@parexel.com. Supervisors, HR, IA, or LRM professionals who receive a report of a suspected violation must inform the Chief Compliance Officer (CCO) immediately. The CCO is responsible for informing the General Counsel (GC) of all reported matters and the Chair of Audit, Finance and Compliance Committee (AFCC) for matters involving accounting, internal accounting controls, or auditing matters.

All concerns properly raised under this policy will be addressed promptly and treated as confidential information.

6. Hotline

If you feel you are unable to report a concern to any of the recommended individuals or resources outlined in the Reporting Section, you are strongly encouraged to report your concerns through our Ethics Hotline, which is hosted and managed confidentially by an independent third-party provider. This reporting tool is available globally 24 hours a day, seven days a week. The Ethics Hotline can also be accessed by external parties including customers, suppliers and consultants who wish to report an issue.

The Ethics Hotline enables you to submit information confidentially with the option to report it anonymously. Please keep in mind that reporting anonymously can make it difficult for Parexel to conduct a thorough investigation of your report, but we understand the need to sometimes file reports anonymously. The Ethics Hotline also enables you to communicate anonymously with the Compliance team and to obtain and give follow up on the matter under investigation.

You can submit confidential and anonymous reports electronically at www.parexel.ethicspoint.com or you can find the available [toll-free telephone numbers](#) for your country. Hotline callers have the ability to submit their reports verbally in several major languages to the independent third-party hotline staff.

A tracking and case management process is used to ensure reported incidents are collected in a centralized location, investigated promptly, resolved in a timely manner, and accurately reported no matter where or how they originate. All reports will be acknowledged promptly and no later than five (5) business days after they are received. Investigations are expected to be completed no later than 90 days after receipt of a reported concern. However, more complex investigations may take longer. You will be updated on the status of the investigation and advised when the matter is finalized, and the matter closed

7. Investigation

All reported matters are taken seriously and investigated in a prompt, fair and thorough manner to determine if any Company policies or applicable laws and regulations have been violated.

Parexel's CCO, or delegate, is responsible for investigating all reported concerns regarding compliance with Parexel's Code of Conduct or other Company policies, or applicable laws and regulations. The CCO will notify and update the Executive Leadership Team and the Audit, Finance & Environmental, Social, Governance (ESG) Committee of the Board of Directors (Audit Committee).

Parexel has appropriate escalation procedures in place to deal with circumstances where the potential misconduct involves executive management, financial improprieties, or a danger to any Representative.

Representatives are expected to cooperate fully and completely with any investigation. This means that you must respond truthfully and completely to investigators, answer questions that may be asked in interviews, and provide documents, records, and other materials upon request. The failure to cooperate in an investigation may be considered misconduct and can lead to serious discipline, up to and including termination.

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Effective Date: 05 Oct 22

Confidential

Developed from TP-BPM-WW-010; related to SOP-BPM-WW-001

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8. Reporting to the Board of Directors

The Audit Committee will receive a summary of reported matters submitted under this Policy together with additional information about any material matters raised at least quarterly. Individual reports may be escalated to the Audit Committee at any time, as necessary and appropriate.

9. RASCI Chart

	Chief Executive Officer (CEO)	GC	CCO	Managers	AFCC	Employee
Creation, Maintenance, and Communication of Policy	C _a	A	R		C _i	
Reporting issues			A	R		R
Determine Issues Requiring Investigation	C _a	C _i	A, R		C _a	
Investigate Issues	C _i	C _i	A, R		C _i	
Oversee and monitor the program		A	R			
Promote the program to all potential Representatives		A	R			

Legend:

R - RESPONSIBLE	Person/people who are/will be responsible for implementation of the decision
A - ACCOUNTABLE	Individual who has ultimate authority/responsibility to make a decision
S - SUPPORT	Individual who supports process activity
C - CONSULTED	Person/people whose input/opinion is required for the decision
C_i -	CONSULTED for input
C_a -	CONSULTED for agreement
I - INFORMED	Person/people who need to know of the decision

10. Revision History

Code Version:	817-03	Effective Date:	05 Oct 22
Policy Owner:	Chris Kiezulas	Replaces Document:	817-02
Responsible Unit:	Corporate	Active Country / Region / Unit:	Worldwide
Summary of Change:			
<ul style="list-style-type: none"> • Scope expanded to include third parties. • Inserted sections covering investigations and confirming reporting to the Board of Directors. • Changed responsibility from GC to CCO for handling reported matters and investigations. • Adapted to new CP Template. 			
Associated Documents:			
New	None		
Updated (Changed)	None		
Retracted (Removed)	None		
Obsolete (Replaced)	None		
Code Version:	817-02	Effective Date:	19 Dec 18
Policy Owner:	Marty Mahoney	Replaces Document:	817-01
Responsible Unit:	Corporate	Active Country / Region / Unit:	Worldwide
Summary of Change:			
<ul style="list-style-type: none"> • Updated text to provide more clarity. • Aligned group names to recent organizational changes. 			
Associated Documents:			
New	None		
Updated (Changed)	None		
Retracted (Removed)	None		
Obsolete (Replaced)	None		
Code Version:	817-01	Effective Date:	01 Jul 14
Policy Owner:	Dennis Barnes	Replaces Document:	N/A
Responsible Unit:	Corporate	Active Country / Region / Unit:	Worldwide
Summary of Change:			
<ul style="list-style-type: none"> • New CP. 			

Code Version:	817-01	Effective Date:	01 Jul 14
Policy Owner:	Dennis Barnes	Replaces Document:	N/A
Responsible Unit:	Corporate	Active Country / Region / Unit:	Worldwide
Summary of Change:			
Associated Documents:			
New	None		
Updated (Changed)	None		
Retracted (Removed)	None		
Obsolete (Replaced)	None		

11. Deviations

Applicable deviations to this Policy may be accessed in the Deviations area of the Controlled Documents Library (CDL).	
Location: PMED	Responsible Administrator: BPM Representative

12. Storage

Storage of Original Document	
Location: PMED	Responsible Administrator: BPM Representative

13. Signatures

Technical Content Approval	Signatory
	Shailaja Mahagaonkar Director & Quality Documents Committee Chair, Business Process Management

Legal & Risk Management Approval	Signatory
	Mike Crowley Executive Vice President, Chief Administrative Officer and General Counsel

Authorization by CEO	Signatory
	Jamie Macdonald Chief Executive Officer

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