



# Fortrea Code of Conduct and Ethics

A guide to help you make the right choices and smart decisions consistent with ethical standards.

## Message from the CEO

Colleagues,

Fortrea's ability to deliver our mission relies on trust. Employee trust. Client trust. Patient trust. Shareholder trust. Trust of the communities where we work. Trust is built day by day based on what we do and how we do it; and it can be broken in an instant.

Fortrea's Code of Conduct and Ethics ("Code") is an essential resource to enable us to do the right thing in the right way so that we can earn and protect the trust of all our stakeholders. It sets out the principles and frameworks we follow and points to where you can find additional help and support.

While Fortrea's Code of Conduct cannot cover every situation you may encounter, reading the Code, along with our policies, will equip you with a working knowledge of relevant laws, regulations and practices so that you can make the right choices and locate the exact guidance you need.

Following our Code is vital. We expect nothing less than an unwavering commitment to operating with the highest levels of ethics and integrity. Every one of us must not only understand our Code, we must live it each day.

I also encourage you to speak up if you ever have a question or concern without any fear of retaliation.

Fortrea managers and people leaders have an additional responsibility to lead by example and to enable their teams to follow our Code.

Please carefully consider our Code in the context of your role and daily activities. It is designed to empower you by informing - not replacing - your own judgement. Thank you for your dedication to **doing the right thing in the right way.**

Sincerely,



Anshul Thakral  
President and CEO  
Fortrea



**What do I do if the Fortrea Code of Conduct and Ethics is stricter than the local law, practice or custom?**

You must comply with the Fortrea Code of Conduct and Ethics.

**What do I do if the local law has stricter requirements than the Fortrea 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 or Legal.**



## Expectations of individuals under the Code

### Who does the Code apply to?

Unless explicitly excepted from a section, the Code applies to all Fortrea employees, officers and directors, as well as contingent workers, independent contractors, suppliers, vendors, student interns, business partners and representatives who work on Fortrea's behalf. Each of us is required to read, understand and follow all relevant Fortrea policies and procedures and this Code. Compliance is everyone's responsibility.

### What is expected of me?

This Code, together with Fortrea'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 Fortrea 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 Legal 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

Fortrea 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, Fortrea 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 Fortrea's Human Resources policies, or other specific Company policies. You should consult with Legal for further guidance and discussion of many of the topics addressed in this Code.

**Those who violate this Code will be subject to disciplinary action as Fortrea deems appropriate, up to and including discharge from Fortrea, 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.

**If you are unsure of “the right thing to do,” before you act, ask these questions to guide you through the difficult situation:**

- Is the action or decision legal?
- Does it comply with the Code of Conduct and Ethics?
- Is it permitted under a Fortrea policy or procedure?
- Would I feel comfortable explaining my decisions or actions to my colleagues, people leader, family or friends?

**If your answer to any of these questions is no, please reconsider your actions and seek guidance to help make the right decision.**

## Ethical decision-making

For the Code to work most effectively, it is important to ask questions and voice concerns. Fortrea'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 Legal or your 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.

### For more information

**People Leaders and Senior Leadership** — can offer advice on how the Code pertains to your particular role at Fortrea.

**Legal** — can advise on how Fortrea 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 issue



## 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 or regulations of 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;
- Contact Legal;
- Speak with anyone else on the management team; or
- Call or report through the online portal for the Fortrea 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 General Counsel or Legal's Compliance department. Reports related to accounting, internal accounting controls or auditing matters will be forwarded to the Internal Audit Department.

Fortrea has established the Fortrea 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 Fortrea Action Line 24 hours a day, seven days a week, in your preferred language by reporting online at [fortrea.ethicspoint.com](https://fortrea.ethicspoint.com). You may also contact the Fortrea Action Line via phone. If located in the U.S. or Canada, dial (844) 612-7369. If located outside the U.S. or Canada, dial the country specific toll-free number provided in the online portal.

Reports may be made anonymously via the Fortrea 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 and 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 Legal 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

## What happens when I report?

### CONTACT

Reports made to the Legal Department directly or via the Fortrea Action Line are reviewed and promptly assigned for investigation.

### REVIEW

Reports may be redirected to another appropriate group, like Human Resources, to address depending on the nature of the concern.

### INVESTIGATION

You may be contacted by an investigator so that more information can be gathered.

A full investigation may take as little as one week up to several months.

### CASE CLOSED

If permissible, you may receive an update that the report has been investigated and action taken.

Due to privacy concerns, you may not receive additional information about the outcome of the investigation.

## No retaliation

Fortrea 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.

## 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

Fortrea 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 e.g. on the basis of an individual's Protected Status.
- Harassment involves any unwelcome 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 unwelcome 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.

**Fortrea does not tolerate harassment or the creation of a hostile work environment from anyone e.g. a coworker, people leader, vendor, supplier, customer or patient.**

### Code in Action: Case Study

**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 Fortrea 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.

### 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 Fortrea premises;
- Possessing, selling, using, transferring, or distributing illegal drugs or controlled substances while working on Fortrea 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. Fortrea's vendors and suppliers are subject to additional scrutiny, as permitted by law, and under the requirements set forth in the Fortrea Supplier Code of Conduct.

### Anti-violence

Fortrea 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.

Fortrea 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 Fortrea business anywhere in the world outside of our premises.

Don't delay – speak up and report threats or potential violence immediately to local management.



## The way we do business

### Fair competition and fair dealing

We compete fairly and honestly. Fortrea complies with all applicable antitrust and competition laws. These laws are intended to foster competition and encourage Fortrea 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, Fortrea'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 Legal 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 Fortrea.

## Business courtesies and gifts and entertainment

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. Fortrea 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 Fortrea or by its pharmaceutical and device company customers). Any such gifts or entertainment to, from or for third parties should be consistent with the Fortrea Gifts and Hospitality Policy and in accordance with applicable laws and regulations.

### Code in Action: Case Study

#### **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 Fortrea policy limitations on acceptable meals and entertainment.

#### **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 Fortrea 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".

#### **Courtesies and gifts may be accepted if:**

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

## Privacy, information protection and security

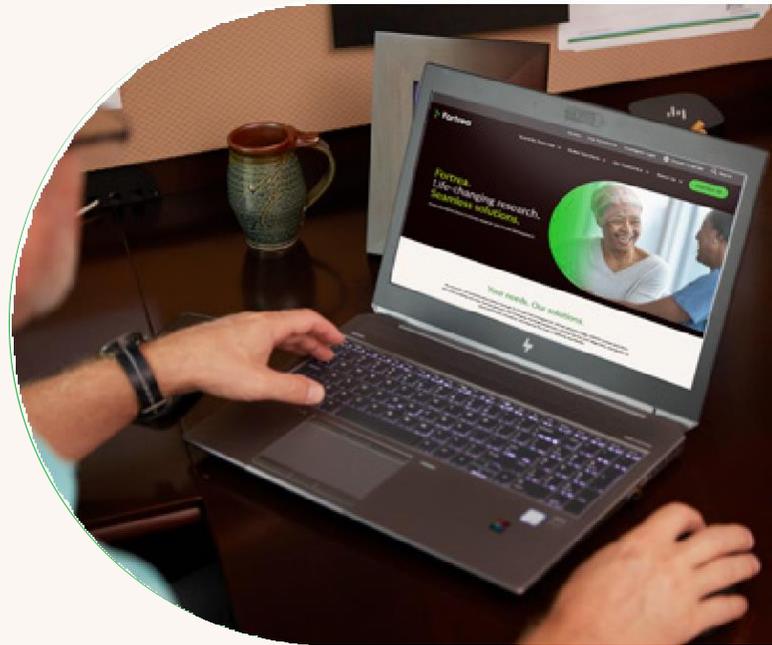
Fortrea respects the privacy rights of those with whom we work, including patients, study participants, employees, clients and vendors. Protecting the privacy and security of patient information is of utmost importance to Fortrea's business and key to maintaining the trust of patients, study participants and clients.

Fortrea 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 European Union General Data Protection Regulation (GDPR).

All personal information maintained by Fortrea 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 Fortrea Data Protection Officer or General Counsel, 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 Fortrea or its customers, except when Fortrea Legal 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 Fortrea 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 Fortrea ends.

You must not send any confidential information or third-party personal data to your personal email address, or an email address of a third party not entitled to receive that information. **Check before you send.**

At Fortrea, we understand the importance of using artificial intelligence ("AI") to forward our mission to make life-changing healthcare solutions possible. Only Fortrea approved AI tools must be used, and your use of such AI must comply with Fortrea's AI/Machine Learning, Privacy and IT Policies.

## 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 Fortrea, such that it may be or appear to be difficult for that person to perform their Fortrea 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, Legal 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 Fortrea’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 Fortrea business opportunities for personal gain.

Officers and employees must notify and obtain approval from Legal 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
- 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 Fortrea business?
- Escalate to Legal if necessary.

## Advisory board participation

Fortrea employees are known around the world as thought leaders and key influencers. We encourage employee participation in the broader healthcare and philanthropic community. But it's important to participate in the right opportunities. What should you consider before you participate?

Consider this:

- Do your personal interests obstruct or conflict with Fortrea’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 Fortrea?
- Do you have decision making authority or responsibilities that could impact either Fortrea or the Advisory Board Company if it were to compete or engage with Fortrea?

## External communication and social media

**Media:** If you are contacted and asked to discuss Fortrea 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 [media@fortrea.com](mailto:media@fortrea.com).

**Social Media:** Social media is an integral part of our personal and professional lives. It is appropriate to celebrate and discuss Fortrea while protecting the privacy, safety and dignity of friends, clients and coworkers. You may not post sensitive, proprietary, confidential or unpublished financial information about Fortrea, or any Protected Health Information (PHI) on social networking sites and blogs. Communicating confidential and/or proprietary information about Fortrea 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 Fortrea or its subsidiaries without appropriate Fortrea approval. Federal Trade Commission regulations apply to publishing promotional content online including content designed to endorse, promote, sell, advertise or otherwise support Fortrea 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 Fortrea.

When using social media, you should be clear that you do not speak on behalf of Fortrea. You should always:

- State that the materials and opinions you are posting are yours and not Fortrea'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 Fortrea 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 Fortrea 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 Fortrea.

## Protection and proper use of Fortrea 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 Fortrea assets should be used for legitimate business purposes and should not be used for non-Fortrea 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.

This obligation includes protection of Fortrea'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 Fortrea policy. It could also be illegal and result in civil or even criminal penalties.

## Intellectual property

Fortrea'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 Legal. 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 Fortrea. 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 Fortrea 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.

## Record keeping and retention

Fortrea requires honest and accurate recording and reporting of information to make responsible business decisions. Fortrea 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.

Fortrea provides financial information to the public that is accurate. All of Fortrea's books, records, accounts and financial statements must be maintained in reasonable detail, must appropriately reflect Fortrea's transactions, and must conform both to applicable legal requirements and to Fortrea's system of internal controls.

All employees are responsible to report to Fortrea 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 memoranda 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 Legal before disposing of any documents potentially relevant to any litigation or internal or governmental investigation.



### **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.



## 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 Fortrea 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 Fortrea’s customers, suppliers, third parties and any of their affiliates.

#### Watch out for:

- Buying, selling or otherwise trading in:
  - Fortrea stock while aware of inside or non-public information about Fortrea; 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 officer

In addition to complying with all other parts of this Code, if you are Fortrea’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 Fortrea’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 Fortrea files with, or submits to, the Securities and Exchange Commission (SEC) and in other public communications made by Fortrea.

## 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. Fortrea 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 Fortrea 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 Legal.

Moreover, any financial arrangement with a client or potential client should be carefully structured according to applicable Fortrea 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 covers both public and private sector employees.

### 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 Fortrea.
- All third party suppliers, vendors or others receiving payment from Fortrea must comply with the Fortrea Supplier Code of Conduct.

### 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;
  - Customs and importation officials;
  - Healthcare regulators; and
  - Public international organizations.

## Quality

Fortrea upholds the highest ethical, scientific and medical standards in all research and development activities.

Fortrea 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 Good Clinical Practices (GCP), 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 Fortrea'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 Fortrea's Quality Management System. We are responsible for maintaining complete, consistent and accurate data from creation through archival and destruction.

## International trade and sanctions

With global reach and locations worldwide, Fortrea 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 re-export 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 Fortrea because Fortrea will not boycott Israel.
4. Other import and export laws and other regulations may exist to restrict trade with certain countries.

## Human rights

Fortrea 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, Fortrea 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.

### 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.

## Environment, health and safety

Fortrea strives to provide a safe and healthy work environment. 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.



For more information

[Fortrea 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 Fortrea's Board or a Board committee and will be promptly disclosed to Fortrea's shareholders and otherwise as required by law, regulation of the SEC or stock exchange regulation.

## Administration

**The Fortrea Board of Directors**, through the Audit Committee, 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.

