



**CODE OF ETHICS
AND
BUSINESS CONDUCT**

**From Curiosity
to Cure**

Table of Contents

- 1. Application of the Code 2
- 2. Our Core Values : The Curia Way 3
- 3. Raising Concerns and Reporting Violations 4
- 4. Discipline 5
- 5. Code Principles 6
- 5.1. Operational Excellence 6
- 5.1.1. Product Quality and Safety 7
- 5.1.2. Data Integrity 8
- 5.1.3. Environmental Protection and Occupational Health and Safety 8
- 5.2. Corporate Integrity and Compliance 10
- 5.2.1. Anti-Corruption and Anti-Bribery Guidelines 10
- 5.2.2. Accuracy of Books and Records 11
- 5.2.3. Proper Use of Company Assets 11
- 5.2.4. Confidentiality of Business Information 11
- 5.2.5. Trade Controls 11
- 5.2.6. Fair Dealings 12
- 5.2.7. Managing Conflicts of Interest 13
- 5.2.8. Anti-Money Laundering 15
- 5.2.9. Additional U.S. Government Ethics Concerns 15
- 5.2.9.1. Lobbying 15
- 5.2.9.2. Current and Former Government Employees 16
- 5.2.9.3. Procurement Integrity 16
- 5.3. Our People and Partners 19
- 5.3.1. Equal Employment Workplace Free from Harassment and Discrimination 19
- 5.3.2. Freedom from Substance Abuse and Workplace Violence 20
- 5.3.3. Interactions with Business Partners 20
- 5.3.4. Combating Trafficking in Persons 20
- 5.3.5. Social Media 21
- 5.3.6. Privacy 22



1. Application of the Code

This Code of Ethics and Business Conduct (the “Code”) is applicable to all employees, directors, officers and agents of Curia Global, Inc. and its subsidiaries (collectively, the “Company” or “Curia”). It also sets forth expectations of conduct from our business partners. It is therefore the responsibility of each such person to ensure compliance with the provisions of the Code at all times. Any references to “you” or “your” in this Code shall be understood as a reference to the person(s) subject to this Code and “we” includes “you”.

As a global business organization, Curia is committed to conducting its business in compliance with applicable laws and regulations of the locations in which it operates. At times, it is possible that the local laws of a particular jurisdiction in which the Company operates conflict with the provisions of the Code. Such conflicts shall be resolved by complying with the more restrictive provisions of the two: i.e., where the standards set forth in the Code are higher and more stringent compared to local laws, you should comply with such higher standards in the Code, and where local laws are more restrictive than the provisions of the Code, you should comply with the more restrictive legal requirements. Also, such conflicts between the Code and applicable law should always be brought to the attention of the Human Resources Department or the Legal Department for further guidance.

COMPLIANCE IN PRACTICE

- Understand the provisions of the Code, our values and underlying corporate policies and procedures.
- Be familiar with the laws and regulations governing your duties and responsibilities.
- Conform your actions to the letter and spirit of the Code, policies and applicable law.
- Seek clarifications and ask for guidance when unsure of the proper course of conduct.

2. Our Core Values : The Curia Way

Curiosity

We are relentlessly curious, committed to innovation, continuous improvement and growth.

Urgency

We work with urgency and energy because patients can't wait.

Respect

We treat others with respect and work to be worthy of their time.

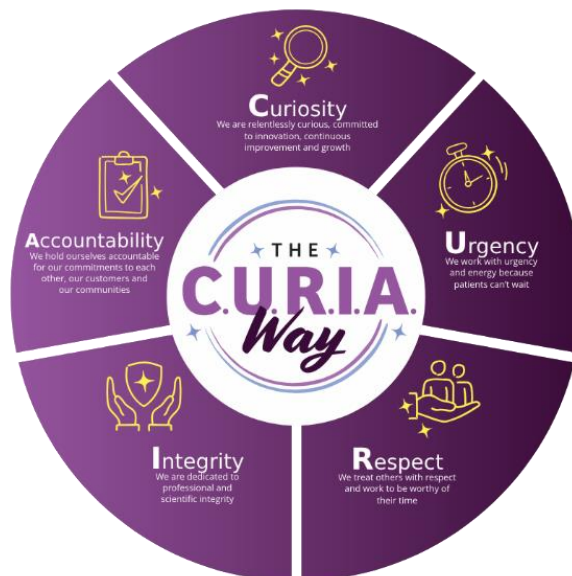
Integrity

We are dedicated to personal, professional and scientific integrity.

Accountability

We hold ourselves accountable for our commitments to each other, our customers and our communities.

Our core values act as an ethical compass helping us navigate the complex and sensitive business environment in which we operate . This Code is essentially a codification of our value system intended to provide guidance to employees on business conduct as well as Company expectations and commitments. The Code, however, does not and cannot, address every possible situation that you may encounter. We expect that you will exercise good business judgment, raise concerns, ask questions and ensure that your conduct is guided by, and upholds, the Company's values and beliefs at all times.



3. Raising Concerns and Reporting Violations

It is our collective responsibility to abide by the Code and our values and therefore, each one of us has an obligation to report in good faith any concerns or violations, whether actual or suspected, so that appropriate preventive or remedial action can be taken immediately.

If you wish to ask questions, raise concerns or report any issues concerning compliance with the Code or relating to any suspected or potential violations of the Code, a law, a regulation or a policy, you may choose to do so through a number of different communication channels i.e.,

- Your manager or supervisor
- The Human Resources Department
- The Legal Department, including directly to the Deputy General Counsel & Compliance Officer
- The Reporting Hotline

Site Directors and your local Human Resources representative or a member of Corporate Human Resources are always available to answer and address any questions or concerns you may have regarding the Code or otherwise. Reports may be made orally, via electronic website submission, or in written form.

Questions or reports concerning any actual, potential or suspected violations of this Code, including but not limited to accounting, auditing or financial matters, or interpretation of the Code, corporate policies or applicable law, as well as requests for guidance on matters not specifically addressed in the Code or corporate policies, may be directed to the Company's Compliance Officer, the General Counsel or the Senior Vice President, Human Resources.

A dedicated Reporting Hotline is also made available to employees as well as third parties 24 hours a day, 7 days a week and 365 days a year, enabling you to report concerns and violations via an anonymous (where permitted by law) or non-anonymous phone or web submission. The Reporting Hotline can be accessed via the Ethics Point Website at <https://curiaglobal.ethicspoint.com/> or by phone by way of the EthicsPoint Reporting Hotline.

China: 400 120 0241
France: 0 800 99 17 04
Germany: 08001821139
India: 000 800 919 1442
Italy: 800715077
Spain: 900876232
UK: 0800 048 5844
US: 1-888-475-0480

You are generally not required to identify yourself while submitting a report or concern. All reports will be reviewed and investigated as appropriate regardless of whether you identify yourself but you must understand that anonymous reporting may restrict the Company's ability to undertake the investigation and follow-up required to resolve the issue.

If you do choose (or are legally required) to identify yourself, the Company will use reasonable efforts to protect the confidentiality of your identity and any information you provide. Any such information will be shared only on a "need-to-know" basis with those responsible for investigating and addressing your concerns, subject to applicable law or regulation.

Directors, officers and employees are expected to cooperate in internal investigations.

No retaliatory action will be taken or permitted against any employee making good faith reports of a violation or suspected violation of the Code. Retaliation can include any negative job action, such as demotion, discipline, firing, salary reduction, or job or shift reassignment. Any action which would dissuade an employee from raising a concern about a possible violation or engaging in other related protected activity can constitute retaliation. Retaliation can have a negative impact on overall employee morale. In order to effectively implement and enforce the Code, it is important that employees feel comfortable speaking up about their concerns and are able to report Code, policy and legal violations without fear of any negative consequences.

If you believe you have been retaliated against (or were threatened with retaliation) for reporting a concern or providing information regarding misconduct in good faith, please contact the Human Resources Department or the Legal Department or alternatively use the Reporting Hotline to report the matter.

Any person who violates this anti-retaliation policy will be subject to disciplinary action, including termination.

COMPLIANCE IN PRACTICE

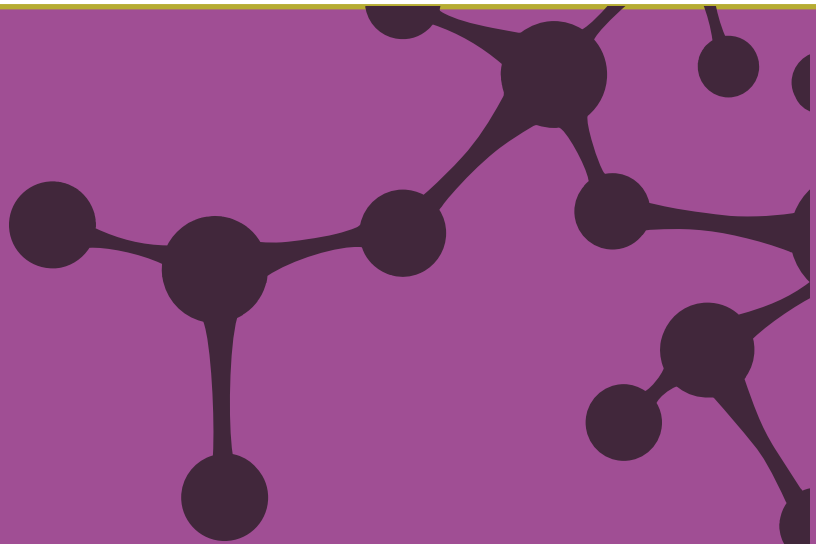
- Use reporting channels to submit genuine concerns, suspicions or complaints in good faith (even if such concerns may be ultimately revealed to be unfounded in an investigation).
- Provide as much relevant information as possible to enable a thorough investigation of the issue.
- Do not knowingly submit false or frivolous reports or otherwise misuse the channels in bad faith.

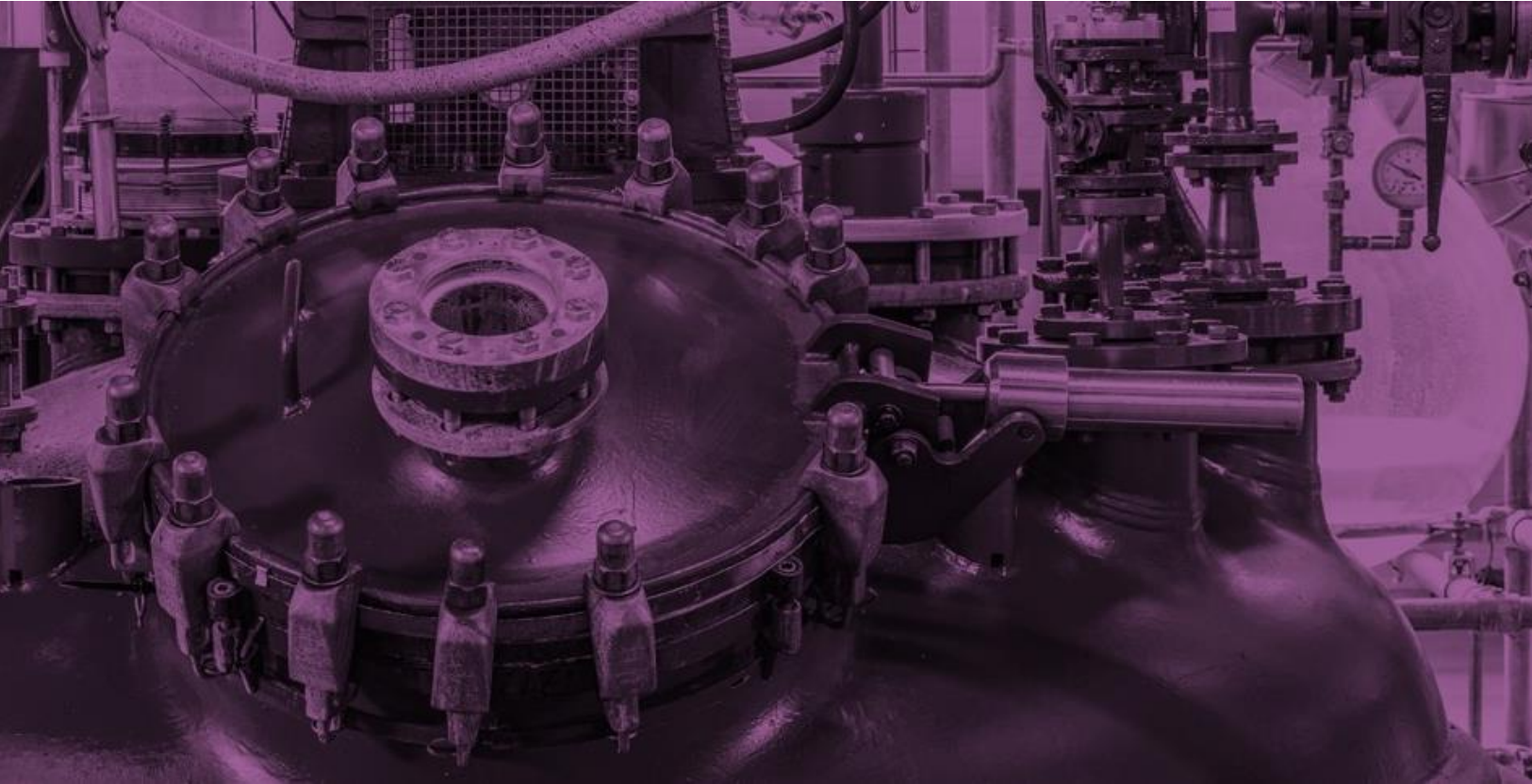
Any non-compliance with the Code or underlying policies will be subject to appropriate disciplinary action up to and including termination of employment. Misconduct inviting disciplinary action includes:

- Violating the Code, any Company policy or applicable law;
- Asking or directing other employees to perform actions that would violate the Code, any Company policy or applicable law;
- Deliberately withholding information or refusing to cooperate in investigations concerning violations of the Code, any Company policy or applicable law;
- Retaliating (or threatening or encouraging retaliatory action) against an employee who reports a Code, policy or legal violation or participates in a related investigation;
- Knowingly submitting false or frivolous reports accusing fellow employees of Code, policy or legal violations.

Managers and supervisors may also be sanctioned for violations committed by employees under their supervision if circumstances indicate lack of reasonable oversight and diligence that could have prevented such violations.

The type of disciplinary action taken will depend upon the nature, gravity and frequency of misconduct, and may range from verbal or written warnings to termination of employment. Legal violations may also be reported to appropriate authorities as necessary for civil and/or criminal prosecution.





5.1.1. Product Quality and Safety

As a global contract research and manufacturing organization dedicated to improving patient outcomes, Curia is heavily focused on the quality and safety of its products. We have built our reputation on the superior quality of our products and operations, and the high safety standards they meet. We implement appropriate internal controls and quality management systems to provide assurance to customers and patients that our manufacturing operations are designed to consistently yield safe, high-quality products. As a manufacturer of pharmaceutical products, we are subject to several regulatory requirements governing certain aspects of our business i.e., Good Manufacturing Practices, Good Laboratory Practices, regulations governing the manufacture, storage, use and handling of controlled substances etc.. Our commitment to quality and safety requires us to demonstrate compliance with the standards set by these laws and regulations as applicable to our operations.

It is therefore extremely critical that you adhere to appropriate quality guidelines and regulatory requirements in the fulfillment of your responsibilities. It is also equally important that you seek opportunities for continuous improvement and embrace newer and better processes and practices that enhance product quality and efficacy without compromising on safety.

5.1.2. Data Integrity

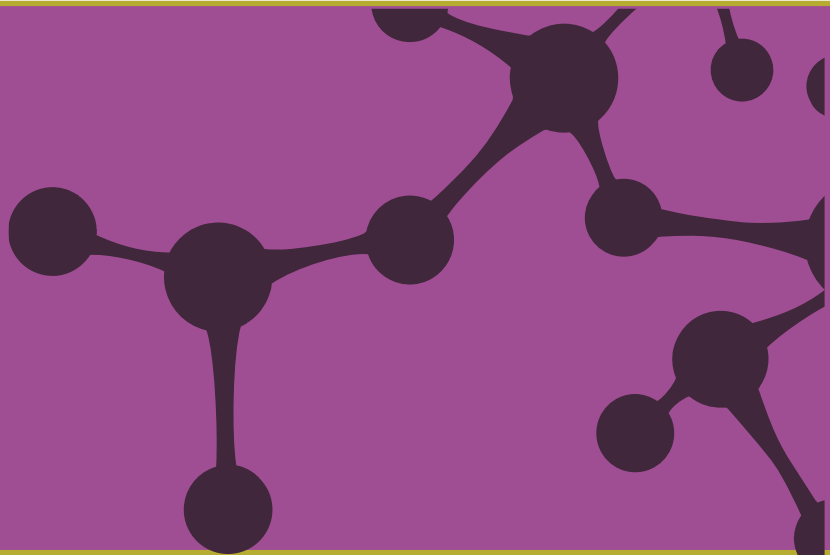
Data integrity is a fundamental component of our product and service offerings and is indispensable to meeting our quality and patient safety commitments. Be it research and development or the manufacture and testing of products, the quality of data generated is what drives critical decision-making at different stages of the pharmaceutical development cycle. Data integrity requires that data collected be complete, consistent and accurate throughout the data lifecycle. Consistent with good operating practices, data integrity controls are embedded into the Company's quality assurance system to ensure that data conforms to the ALCOA principle (i.e., it is attributable, legible, contemporaneously recorded, original or a true copy and accurate) and other guidance set forth by regulatory agencies. In addition to implementing a quality system that is designed to inhibit data integrity deficiencies, it is also imperative that we apply the data integrity principles set forth in Company policies, procedures and systems to every aspect of our day-to-day work life.

5.1.3. Environmental Protection and Occupational Health and Safety

Excellence in the way we do business is truly achieved only when we conduct operations in an environmentally responsible manner and are able to assure a safe and healthy working environment for our colleagues. In fulfilling its commitment towards protecting the environment and its people, Curia maintains a continuous and strong focus on the environmental, health and safety (EHS) aspects of its business. The Company insists on strict compliance with applicable EHS laws and regulations and related internal policies and procedures. We also encourage you to seek opportunities to minimize the total environmental footprint of our activities. We value the health and safety of our colleagues and establish safeguards to prevent occupational hazards, illnesses and workplace accidents. We require prompt reporting and management of safety issues and incidents. Ultimately, we expect that each of us will take personal responsibility for our own safety and that of our colleagues by following safety rules and regulations, providing and receiving appropriate training for the performance of our duties and acting in a diligent and responsible manner at all times.

COMPLIANCE IN PRACTICE

- Strictly follow protocols and procedures set forth in Curia's quality assurance system and EHS guidelines at all times.
- Report deviations, quality concerns, injuries and similar incidents immediately in accordance with applicable notification and escalation protocols to ensure that prompt corrective action can be taken.
- Do not prioritize meeting deadlines or generating cost savings at the cost of product quality, safety or data integrity.
- Conserve resources and minimize waste; responsibly handle equipment and materials; manage, store and dispose of any hazardous substances in accordance with applicable laws and regulations.



5.2. Corporate Integrity and Compliance



5.2.1. Anti-Corruption and Anti-Bribery Guidelines

Curia prohibits bribery and corruption of any form in the conduct of its business activities. No person acting on behalf of the Company may, directly or indirectly, offer, authorize, solicit or receive, a bribe, kickback, other corrupt payment or anything of value for the purpose of improperly influencing the actions of a government official or private individual, or otherwise in exchange for an unfair advantage in connection with Curia's business.

The Company is subject to, and committed to complying with, global anti-corruption laws and regulations, including but not limited to the U.S. Foreign Corrupt Practices Act and the U.K Bribery Act. The requirements of these laws and corresponding Company policies are strictly enforced by the Company in its efforts to recognize, detect and prevent potential anti-corruption violations in a timely and effective manner. For more information, please read the Company's Anti-Bribery, Anti-Corruption, U.K. Bribery Act, and U.S. Foreign Corrupt Practices Act Policy available at <https://curiglobal.com/about-us/corporate-responsibility/>.

5.2.2. Accuracy of Books and Records

The Company requires that all books and records be maintained in order to reflect complete, relevant and accurate information that can be relied upon by all stakeholders for sound decision-making and fulfillment of our legal, financial and contractual responsibilities. Recording of information in a dishonest, deceptive or misleading manner is strictly forbidden. Financial records must accurately represent the fair value of Company assets, liabilities, income and expenditure, and reflect the true nature of business transactions. If you are involved in accounting or financial reporting activities, you must be fully conversant with the accounting and financial policies, rules, regulations and practices applicable to your work and must adhere to the Company's internal financial controls and protocols to ensure fair and accurate presentation of financial information.

5.2.3. Proper Use of Company Assets

Company assets such as intellectual property, equipment, facilities and other physical, financial, personnel and informational resources must be utilized for business purposes only. We are all responsible for safeguarding Company assets under our care or use from loss, damage and misuse and must promptly report any loss or unauthorized access or improper use of business assets that we become aware of.

5.2.4. Confidentiality of Business Information

The Company's proprietary information and intellectual property are extremely valuable corporate assets that provide significant competitive advantage to Curia and must be protected from unauthorized disclosure and use at all times. We are also frequently entrusted with the confidential information of third parties such as customers, suppliers, business partners etc. and must protect such information from improper disclosure or use with the same care and diligence as we protect our own.

Confidential business information may be used only for authorized purposes in furtherance of the Company's interests. Except where disclosure is required by law, confidential information may be typically shared only with those with a legitimate need-to-know (even within the Company) and who have undertaken confidentiality obligations under contractual arrangements with the Company. All employees and agents are required to execute and abide by agreements undertaking to protect the confidentiality of business information, which obligations continue even after termination of employment or association with the Company.

5.2.5. Trade Controls

A number of countries in which Curia has operations have implemented laws that regulate and control the import, export and re-export of certain products, impose economic sanctions and embargoes against specific individuals, entities, countries and governments, and prohibit certain restrictive and unfair trade practices. The

Company requires that its business across the globe be conducted in full compliance with any such applicable trade controls.

Any transaction with a country or individual or entity against which restrictions, sanctions or trade embargoes are in place under applicable law must be referred to the Legal Department for review and approval as to whether it is a legally permissible transaction, before it can be proceeded with.

Employees must diligently contribute to, and cooperate in, the Company's efforts to ensure that its activities do not violate any national or international trade laws as such violations could result in severe penal consequences for the Company including fines, prosecution or restrictions on trade privileges in or with a country.

5.2.6. Fair Dealings

Fairness in dealing with our colleagues, business partners and the public helps us earn the trust of our stakeholders and strengthens our reputation as an ethical and responsible member of the business community.

We believe in competing in a lawful and ethical manner and do not seek to benefit from any competitive intelligence or information that has been obtained in an improper, unfair or illegal manner. You must be careful to not accept or use competitive information unless you have reason to believe that it has been obtained in a lawful and ethical manner. To avoid even the semblance of impropriety in collecting market or competitive intelligence, you must be careful to rely on publicly available sources and refrain from soliciting or accepting information from current or former employees of, or third parties with access to confidential information about, competitors.

We are committed to promoting free and fair competition and do not engage in restrictive, unfair or anti-competitive practices. We require strict compliance with the competition and anti-trust laws of the countries in which we operate. You must understand that due to the complexity and jurisdictional variations of these laws, specific assessment by the Company's Legal Department will be required in many cases before certain actions and transactions can be authorized. Nevertheless, as a general, non-exhaustive guidance, most laws and the Company's fairness standards require us to refrain from engaging in (i) agreements with competitors or partners that attempt to improperly create a monopolistic situation or otherwise restrict competition by dividing or allocating markets, restricting output or fixing prices; (ii) collusive agreements to disadvantage third party rivals (eg. boycott a certain entity's products); (iii) making false or disparaging statements and remarks about third party products and services in order to promote the Company's offerings.

5.2.7. Managing Conflicts of Interest

Conflicts of interest arise when personal interests interfere with one's ability to perform job responsibilities in the best interests of the Company. You must make every effort to avoid potential conflicts of interest. All business decisions and actions must be taken independent of any personal considerations. You must learn to recognize potential and apparent conflicts of interest and when such conflicts arise, you must disclose and resolve them in accordance with guidelines set forth by the Company. Below are a few examples of actual and potential conflict of interest situations with guidance on the proper course of action in the relevant cases. If the guidelines below require disclosure to, and approval by, the Company, of certain matters or transactions, such disclosure must be made to, and approval received from, the General Counsel or the Compliance Officer of the Company. For matters concerning the General Counsel or the Compliance Officer, disclosure to, and approval of, Chief Executive Officer is required. If your specific situation is not addressed anywhere in the Code or other Company policy, you should contact your manager, the Human Resources Department or the Legal Department for assistance.

- **Related Party Transactions:** Transactions involving the Company on the one hand, and you, persons related to you or entities in which you have a direct or indirect interest on the other, always require scrutiny to ensure that the transaction is conducted at arm's length and no improper personal gain is derived. Examples of such transactions include sale or purchase of property, goods and services to or from the Company, loans or other financial transactions with the Company etc. No such related party transaction may be proceeded with unless full disclosure of all material facts, terms and your interest is made to, and the transaction is approved by, the Company.
- **Gifts and Hospitality:** Any gifts, discounts, favors, perks, benefits or other hospitality you (or an immediate family member) give to, or receive from, persons doing or seeking business with the Company may improperly influence business decision-making and are generally prohibited except for:
 - Gifts, contributions or prizes of modest value as per local standards and customs, provided that even such gifts are not permissible if given in the form of cash or if repeatedly offered to or by the same party; or
 - Business entertainment and meals that are lawful as well as reasonable and customary in the normal conduct of business.

Care must be taken to ensure that even though certain modest gifts and customary business courtesies may be permissible, they should be given or accepted only if they are unsolicited by the recipient, and must never be offered to public or government officials (or employees of existing or potential subcontractors and suppliers on government contracts that could be construed as being for the purpose

of having an improper influence in connection with work on a government contract). Such modest gifts and business courtesies must also not be offered or given to, or accepted from, any person under circumstances where the recipient may feel obliged to return a favor or benefit. Moreover, gifts received or offered that have a value in excess of USD 50.00 (or equivalent in local currency) must always be notified to, and pre-approved by, Curia's Compliance Officer and where possible, shared with colleagues.

If you have any questions or are unsure whether a particular item of gift or hospitality is permissible, or if you believe that any person is violating the Company's rules regarding gifts and hospitality, you should immediately report your concerns to your manager, Curia's Compliance Officer/Legal Department or through the Reporting Hotline.

- **Corporate Opportunities:** Company resources must be used only to pursue and further legitimate business interests of the Company. Diverting or taking advantage of corporate opportunities, i.e., opportunities uncovered through use of Company funds, property or position, for personal gain is strictly prohibited, unless such opportunity has been presented to, and rejected by, the Company, acting through the Senior Vice President of the relevant business group.
- **Outside Business and Financial Interests:** You must not let your external business or financial interests interfere with or influence your actions or decisions involving the Company. It is the Company's policy that outside business and financial interests not be acquired by employees, officers and directors unless they have been fully disclosed to, and approved by, the Company. Outside business and financial interests for this purpose refer to any employment, director or officer positions, consulting or supplier relationships or any other direct or indirect business/financial interest (1) in or with a competitor, customer, supplier or other entity with whom the Company has business dealings, that is held by an employee, officer or director of the Company or their immediate family members, where such individual is in a position to influence the business of, or with, the Company; and (2) in any external organization, that is held by Company directors and certain key employees (i.e., Manager/Site Heads and Business Unit Leaders/ Vice Presidents and employees with equivalent or higher title and responsibilities) or their immediate family members. Ownership of, or interest in, publicly traded securities that is not in excess of one percent (1%) of the securities of that corporation is however excepted from this disclosure and approval requirement.
- **U. S. Government-related Conflicts:**

- **Organizational Conflicts of Interest:** The U.S. Government has organizational conflict of interest (OCI) rules that are intended to prevent unfair competitive advantages by restricting a contractor from engaging in roles that might bias the contractor's judgment or advice. For example, a contractor generally cannot draft specifications for the U.S. Government and then participate in the resulting competition. Also, a contractor generally cannot evaluate its own proposal in a competition or its own work during performance on behalf of the U.S. Government. Curia will seek to take appropriate steps to identify, avoid or mitigate OCIs. If a Curia employee believes that there may be an OCI, he or she should seek advice from the Company's Compliance Officer.
- **Personal Conflicts of Interest:** Curia employees must avoid any circumstances that could create the appearance that a government employee is violating the conflict of interest rules. U.S. Government employees are prohibited from engaging in any activity that constitutes a personal conflict of interest and are restricted from participating in matters that could undermine their impartiality. Curia employees will not put government employees in a situation in which their responsibilities to the U.S. Government (including their objectivity and judgment) are compromised by an outside transaction or relationship. Determining what circumstances constitute a prohibited conflict requires case-specific consideration and often can prove difficult. If you are not sure whether a situation poses a potential conflict of interest, you must seek guidance from Curia's Compliance Officer.

5.2.8. Anti-Money Laundering

Money laundering is the process of concealing funds that have been illegally obtained. Curia strictly prohibits using a relationship with Curia to disguise or attempt to disguise the sources of illegally obtained funds. For more information regarding Curia's policies and protocols in this regard, please read the Company's Anti-Money Laundering Statement. This statement can be found at <https://curiaglobal.com/about-us/corporate-responsibility/>.

5.2.9. Additional U.S. Government Ethics Concerns

5.2.9.1. Lobbying

Interactions with U.S. federal or state government personnel for the purpose of influencing legislation, regulations, or decision-making may constitute "lobbying". Curia is required by federal law, and many state laws, to disclose publicly its lobbying expenditures on a regular basis. If a Curia employee communicates with any public official or the public official's staff, the employee and/or the Company may be obligated to register as a lobbyist and/or comply with additional laws, regulations, and rules.

All Curia employees must contact the Legal Department for written approval before engaging in any potential lobbying-related activities. If you are unsure whether or not an action constitutes lobbying, please contact the Legal Department. Every employee is responsible for adhering to this policy. Non-compliance could put the Company at risk and may subject the employee to internal disciplinary action, up to and including termination, and external civil and criminal sanctions.

5.2.9.2. Current and Former Government Employees

U.S. Federal government employees, including members of the armed forces and former employees, are subject to certain limitations on their ability to accept employment with private enterprises. Before conducting potential employment discussions with any individual, it is Curia's policy to verify whether the individual is or was a federal government employee.

- **Employment discussions with current government employees.** Curia employees must not negotiate employment with a government employee while that employee is participating in a matter involving Company. Further, U.S. government employees involved in certain procurement activities cannot accept compensation from a contractor within one year after the government employee served in certain capacities relating to a solicitation under which the Company received a contract exceeding \$10 million.
- **"Revolving door" restriction.** Former government employees are subject to complex "revolving door" and other restrictions that place limits on their post-government activities. Company employees must consult with the Company's Compliance Officer/Legal Department to determine which activities former government personnel are restricted from supporting.

It is Curia's policy to abide by all applicable laws, regulations, and rules regarding employment of current and/or former government employees. For more information regarding these complex employment requirements, please contact Curia's Compliance Officer/Legal Department.

5.2.9.3. Procurement Integrity

It is Curia's policy to refrain from engaging in in any practice that could potentially compromise the integrity of a U.S. government procurement. This includes, but is not limited to, attempting to improperly obtain source selection information, or proprietary nonpublic information of a competitor, such as bid or proposal information or prices, either through improper discussions with government procurement officials, industrial espionage, or any other means. Seeking or obtaining such information is against federal law.



All Curia employees must ensure that Company is entitled to any and all information gathered or received for use in a proposal or in how we interact with government entities. Unless you have obtained prior written approval from an authorized government official, you may not obtain oral or written information (including government planning or budgetary information) that has not been released to the general public or that is subject to restrictions regarding its use. Also, it is against Curia's policy to obtain or seek to obtain non-public information about a competitor's bid, or the government's decision-making process. These restrictions apply to information obtained from third parties, such as consultants, lobbyists, and others.

Examples of protected government source selection information include:

- Bid prices or proposed costs submitted by offerors in response to a government solicitation;
- Any documents reflecting the Government agency's plans for the competition, including source selection and technical evaluation plans;
- Any documents reflecting the Government agency's evaluations of offerors' proposals, such as competitive range determinations, rankings of offerors, selection committee reports, and award recommendations; and
- Any documents marked "source selection information" or with a similar legend.

Examples of protected competitor bid or proposal information include:

- Any information related to cost or pricing, methods for developing cost or pricing, or indirect costs and labor rates that is not in the public domain;
- Any information about proprietary processes and business strategy that is not in the public domain; and
- Any documents marked as "contractor bid or proposal information."

If you inadvertently receive mail or email that you think may contain competitor or government procurement information, do not open the correspondence, and contact the Vice President of Global Procurement. For more information regarding the Curia procurement integrity rules, please contact your manager or the Vice President of Global Procurement or the Legal Department.

COMPLIANCE IN PRACTICE

- Do not offer, promise, give, request, facilitate, receive or accept bribes, corrupt payments or anything of value in exchange for an unfair advantage or improper benefit.
- Record transactions and report information accurately and in compliance with Company's internal controls and protocols.
- Use Company assets responsibly and promptly report any loss or unauthorized/improper use thereof.
- Protect confidential information of the Company (and that of third parties entrusted to the Company) from unauthorized disclosure and use.
- Understand and comply with any trade controls applicable to the business activities of the Company with which you are involved.
- Conduct business activities in a lawful and ethical manner and do not seek or obtain any information or benefits in an illegal, improper, restrictive, unfair, anti-competitive or unethical manner.
- Keep business decisions independent of personal influences; learn to recognize potential and actual conflicts of interest and disclose and resolve such conflicts in accordance with the guidelines set forth in this Code.
- Seek guidance from Legal Department on proposed interactions with Government officials and requirements of Government contracting.



5.3. Our People and Partners



5.3.1. Equal Employment Workplace Free from Harassment and Discrimination

The Company values its workforce immensely and strives to treat its colleagues with dignity and respect. We are committed to providing equal employment and advancement opportunities to all qualified persons without regard to race, color, gender, religion, national origin, age, marital status, disability, veteran status, sexual orientation, or any other personal characteristics protected by law. Employment decisions must be always made based on merit and business needs. We encourage and promote diversity in our workforce and seek to provide a comfortable and productive work environment that is inclusive and free from harassment or discrimination of any kind.

Curia prohibits, and will not tolerate, harassment of or by an employee by a co-worker, a customer, client, vendor, visitor, member of management or any other person in violation of the Code, its policies, or applicable law. Curia also prohibits retaliation against any individual who in good faith complains of perceived harassment or who provides information, or otherwise assists, the Company or a government agency in any investigation of a harassment complaint. Any employee of the Company who engages in harassment or retaliation against

anyone in violation of this Policy will be subjected to disciplinary action, up to and including termination of employment.

5.3.2. Freedom from Substance Abuse and Workplace Violence

We have a responsibility to create and maintain a safe, secure and collaborative workplace. Acts or threats of violence, bullying or other intimidating behavior will not be tolerated and will be dealt with appropriately. The use of drugs or alcohol in a manner that could impair one's ability to safely perform work activities is strictly prohibited. Possession, distribution, sale, purchase or use of alcohol or illegal drugs, while on the job or on Company premises or property (including vehicles) is forbidden and will be subject to appropriate disciplinary action. Due to the substantial health and safety implications inherent in our operations and the products we make and sell, it is critical that each of us strictly complies with these requirements and reports any suspected or actual violations promptly. Any medical situations that may warrant concessions or exceptions to policy must be brought to the attention of your Human Resources manager.

5.3.3. Interactions with Business Partners

We interact with several business partners such as customers, suppliers, service providers, agents, distributors etc. in the course of our day-to-day business. Our partners are extremely critical to our continued and long-term growth and success and it is important that we select our business partners and manage their relationships in an ethical and responsible manner. We expect that the entities with which we do business share our thoughts and values on ethical behavior in business and hence, will conform their activities to the standards and principles set forth in the Code and Company policies. Our suppliers are specifically asked to commit to adherence to Curia's Vendor Guidelines, available at <https://curiaglobal.com/supplier-information/>.

We must nevertheless exercise due diligence in evaluating our partners and ensure that they can abide by applicable legal requirements and the high ethical standards set forth in this Code and other internal policies. We must also communicate our expectations clearly at the onset of a business relationship and monitor compliance on an ongoing basis as their actions, if improper or illegal, could damage the reputation of the Company, cause financial loss and/or expose the Company to severe penal consequences. You must seek guidance and assistance from your manager if you have questions concerning management of partner relationships.

5.3.4. Combating Trafficking in Persons

Curia supports fundamental human rights and refuses to participate knowingly in business activities that abuse those rights. Curia expects its employees to comply with sound business and employment practices that foster human rights. Accordingly, Curia is committed to full compliance with government laws and regulations that

strictly prohibit human trafficking. In accordance with those rules, Curia employees, agents, and contractors shall not engage or be involved, directly, or indirectly, in any form of trafficking in persons or use of forced labor in the conduct of business.

Specifically, as per the requirements of the U.S. Federal Acquisition Regulations (“FAR”), Curia employees, agents and subcontractors shall not do any of the following (*terms with the asterisk (*) notation shall have the meaning ascribed to them under relevant FAR provisions, and additional information can be obtained on request from the Legal Department*):

- Engage in any form of trafficking in persons during the period of performance of a government contract;
- Procure commercial sex acts* during the period of performance of a government contract;
- Use forced labor* in the performance of a government contract;
- Destroy, conceal, confiscate, or otherwise deny access by an employee to the employee’s identification or immigration documents;
- Use misleading or fraudulent practices during the recruitment of employees or offering of employment;
- Use recruiters that do not comply with local labor laws of the country in which the recruiting takes place;
- Charge employees recruitment fees*;
- Fail to provide return transportation or require payment for the cost of return transportation for employees who are not nationals of the country in which the work is taking place and who were brought into that country for the purpose of working on a government contract or subcontract;
- Provide or arrange housing that fails to meet the host country housing and safety standards; or
- If required by law or contract, fail to provide an employment contract, recruitment agreement, or other required work document in writing in a language the employee understands.

Violations of these requirements have severe consequences and may result in actions against Curia employees, agents, and subcontractors. Violations can also have significant adverse consequences for the Company, including contract termination and debarment from government contracting. It is therefore mandatory that all Curia employees adhere strictly to these requirements without exception.

5.3.5. Social Media

Social media provides a digital platform for generating and sharing content, including, thoughts, opinions and beliefs. The Company uses social media for business purposes and respects the right of its people to use it for personal purposes. However, the Company expects that you will engage in social media activities in a



responsible, transparent and respectful manner. When using Company-sponsored social media or engaging in personal use using Company resources or referencing Company interests, you must comply with applicable policies and guidelines set forth by the Company. If you are posting personal comments or opinions, you must take care to not represent your views as those of, or endorsed by, the Company. You must also never discuss or disclose Company confidential information on social media without proper authorization.

5.3.6. Privacy

The Company respects the privacy rights of its employees and informs employees of the collection and processing of their personal data, allowing employees to make decisions and exercise their rights. The Company collects and processes personal data for specific and legitimate business purposes. More information about how Curia handles employee personal data can be found in the Company's Employee Privacy Policy.

Curia also protects and processes the personal data of its customers, vendors, visitors and other third parties in accordance with applicable privacy laws. Anyone utilizing Curia's Information Technology ("IT") resources, including but not limited to, computer systems, email, the network, and the corporate Internet connection, is required to abide by Curia's Computer and Internet Use Policy. If a security incident or breach of any security policies is discovered or suspected, employees must immediately notify his or her supervisor, email itsupport@curiaglobal.com and/or contact the Reporting Hotline.

Additional details regarding Company processes and procedures for handling personal data can be obtained by contacting the Legal Department.

COMPLIANCE IN PRACTICE

- Help us maintain a safe, secure and collaborative workplace without any threat or acts of harassment, discrimination, abuse, or violence of any kind.
- Manage relationships with business partners in an ethical and responsible manner; exercise good business judgment and conduct appropriate due diligence in selecting, evaluating and dealing with business partners.
- Engage in social media activities in a responsible, transparent and respectful manner; do not discuss or disclose Company confidential information and do not represent your personal views or comments as those of the Company.
- Respect privacy rights of individuals and comply with applicable privacy laws, regulations and internal policies in collecting or processing personal information.

