

# inVentiv Health Corporate Compliance Program

## Conducting Business with Integrity

inVentiv Health is committed to conducting business with integrity and preserving a culture of high ethical principles and professional standards. To demonstrate our commitment, we have established a Corporate Compliance Program that conforms to the principles and physical requirements published in the Office of Inspector General, U.S. Department of Health and Human Services “Compliance Program Guidance for Pharmaceutical Manufactures.”

inVentiv recognizes maintaining a successful program depends on employees upholding our cultural beliefs and conducting business in accordance with our Code of Business Conduct and Ethics, company policies and procedures, and applicable laws, regulations, and industry standards that govern the pharmaceutical industry.

Our corporate compliance program includes the following elements:

- Written Policies and Procedures
- Corporate Compliance Officer and Compliance Committee
- Effective Training and Education
- Effective Lines of Communication
- Internal Monitoring and Auditing
- Enforcement through Discipline in Pursuant to Published Guidelines
- Prompt Response and Corrective Action for Detected Problems

## Corporate Policies and Procedures

inVentiv Health has established corporate standards to guide and govern the conduct of employees, officers, directors, consultants, contractors and other company representatives to ensure actions on behalf of the Company are honest, ethical and lawful and beyond reproach. These standards also establish conditions for employment and procedures for detecting and reporting illegal or unethical behavior. inVentiv employees are required to acknowledge their responsibility and commitment to conduct company business in compliance with applicable laws, regulations, and company policies.

Additionally, inVentiv’s business divisions and business units have policies and procedures in place that describe acceptable business practices, specific to their business.

Company policies and procedures are made available through employee handbooks, company websites, and inVentiv’s business divisions.

## Corporate Compliance Officer and Corporate Compliance Committee

inVentiv’s Corporate Compliance Program operates under the direction of our Chief Compliance Officer, who reports directly into the COO of inVentiv Health. The Chief Compliance Officer also chairs the Corporate Compliance Committee which is comprised of compliance specialists representing inVentiv’s business divisions. The Chief Compliance Officer has authority to report compliance matters directly to inVentiv’s CEO, COO and CFO. In addition, the Corporate Compliance Committee has direct access to senior executives who have the authority to implement compliance-related change within their respective business divisions.

## Training and Education

An important element of our Corporate Compliance Program is the training and education of our employees. inVentiv Health is dedicated to ensuring corporate training programs are in place to educate

# inVentiv Health Corporate Compliance Program

employees on their responsibility to comply with company policies and procedures, and applicable laws, regulations and industry standards that govern the pharmaceutical industry.

In addition, inVentiv's business divisions have implemented training programs to educate employees on policies and procedures, applicable laws and regulations, and industry standards specific to their business and employee's job function.

## Effective Lines of Communication

inVentiv adheres to an "Open Door Policy," and encourages employees to discuss issues and/or concerns of misconduct with their manager or other senior personnel, Human Resources or a member of the Corporate Compliance Committee. Other avenues made available to employees include:

### 1 Corporate Compliance Anonymous Hotline

inVentiv's Corporate Compliance Hotline is available 24 hours a day 7 days a week. Employees access the hotline by calling 800-673-7309.

### 1 Corporate Compliance Anonymous Allegation Website

Much like the Corporate Compliance Hotline, our Corporate Compliance Website allows employees to report issues or concerns of misconduct while having a choice to remain anonymous. Employees can access the website at: <https://www.compliance-helpline.com/inVentivHealth.jsp>.

### 1 Communication to the Audit Committee

inVentiv's Audit Committee maintains procedures for the receipt, retention, and treatment of complaints regarding accounting, internal accounting controls and auditing matters. The Audit Committee is readily accessible thru the Director of Internal Audit.

### 1 Chief Compliance Officer and Corporate Compliance Committee

inVentiv's Chief Compliance Officer and members of the Corporate Compliance Committee are readily accessible to all employees seeking compliance information and or guidance. Committee includes:

- Chief Compliance Officer
- Compliance Specialist/Privacy Officer, Patient Outcomes
- Compliance Specialist, Clinical
- Compliance Specialist, Communications
- Compliance Specialist, Selling Solutions & Strategy and Analytics

## Monitoring, Auditing and Investigations

The Chief Compliance Officer will review and evaluate all concerns, questions or allegations reported through the Corporate Compliance Program to determine the need for further investigation. The Chief Compliance Officer may request assistance from members of Human Resources and/or members of the Corporate Compliance Committee to conduct investigations on matters related to their respective business divisions. The Chief Compliance Officer will evaluate audit findings and if necessary, collaborate with Human Resources to ensure corrective action occurs in a timely manner.

inVentiv business divisions have also implemented procedures to monitor and audit compliance with their policies and procedures to detect and correct potential issues before they occur.

# inVentiv Health Corporate Compliance Program

## Enforcement through Discipline in Pursuant to Published Guidelines

inVentiv Health has publicized disciplinary guidelines in place to educate employees on the company's commitment to compliance. Employees are informed that failure to adhere to company policies and procedures may include disciplinary consequences, up to and including termination of employment. Policy violations are reviewed on a case-by-case basis and a thorough investigation is conducted before disciplinary action occurs. To the greatest extent possible, all investigations will be conducted confidentially.

## Prompt Response and Corrective Action for Detected Problems

inVentiv Health has various mechanisms in place to detect violations of law or company policies and procedures. It is expected that compliance issues referred through any of the communication channels (personal contact, e-mail, anonymous fax, compliance hotline or website, etc.) will be carefully reviewed, thoroughly investigated and resolved in a timely manner.

**For a written copy of this inVentiv Health Corporate Compliance Program,  
call 732-584-5379**

## Declaration of Compliance

Based upon our good faith understanding of the California requirements, and to the best of our knowledge, we hereby declare that as of the date of this declaration, inVentiv Health is compliant with this comprehensive compliance program as required by the California Health and Safety Code 119400-119402. inVentiv Health is committed to conducting business in accordance with the highest ethical principles and all applicable laws and regulations, thus when appropriate, will amend and update our policies, and this statement to assure compliance with the law.