LABCORP CODE OF CONDUCT AND ETHICS

A guide to help us make the right choices and smart decisions consistent with ethical standards
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To My Colleagues and Fellow Employees,

LabCorp takes great pride in the contribution we make to patients and their physicians in the diagnosis and monitoring of medical conditions and disease, and in improving treatment options through our important role in the development of new drugs and knowledge services. We are equally committed to providing services of the highest quality and to conducting our business and workplace activities with uncompromising integrity. This means complying with legal standards and with the ethical obligations incumbent upon a company of our global reach and reputation. We succeed only by each of us taking these commitments to heart. We hope and expect that every employee, officer, and director, as well as our agents, representatives, consultants, vendors and contractors, read, understand, fully commit to, and take pride in these standards as outlined in our Code of Conduct and Ethics.

“Our updated Code of Conduct and Ethics addresses the evolving compliance and regulatory framework in which our different businesses operate; its message reflects the core values and culture that LabCorp has always strived to maintain.

This Code establishes the basic framework for how we conduct our business, and the expectations for conduct on the part of everyone working on the company’s behalf. It contains the basic tools necessary to navigate what can sometimes be difficult questions and to make the right decisions. Ultimately, LabCorp’s goal – and the objective of this Code – is simple and straight-forward: Do the right thing. However, inevitably, you may encounter situations when you are uncertain how to proceed or how to apply the Code. If you are in doubt, or have any concerns, be sure to ask a supervisor or any other appropriate person as described throughout this Code.

Management expects everyone to “do the right thing” and we should all expect that of each other. Each of us is responsible for adhering to the principles of this Code, asking questions, and reporting any suspected or potential violations. Managers must promptly respond to any employee concerns, seek guidance when needed, and demonstrate their own commitment to our Code. No one may retaliate against any other employee for raising a question or concern.

I want to thank each of you for your commitment to maintaining the culture of compliance and integrity that this Code promotes. Your efforts will help LabCorp fulfill its mission of improving the health care of patients around the globe.

Sincerely,

David P. King
**What is Expected of Us?**

**ETHICS**
LabCorp holds itself to the highest ethical standards, and expects all employees, officers, directors, contractors, and vendors to do the same. This Code of Conduct and Ethics is intended to serve as a guide to help us make the right choices and decisions consistent with the highest ethical standards.

**INTEGRITY**
LabCorp is committed to uncompromising integrity in all that we do and in how we relate to each other, our customers and vendors, and to the communities in which we operate and provide services.

**LEGALITY**
Obeying the law is one of the foundations on which LabCorp’s ethical principles are built. Each of us must respect and obey the governmental laws, rules, and regulations of the cities, states, and countries in which we operate. Although we are not expected to know the details and nuances of each law, rule, and regulation, it is critical that we know enough to determine when to seek advice from supervisors, managers, or other appropriate personnel.

If a law has stricter requirements than a LabCorp policy or this Code, you must comply with the law. But if a LabCorp policy or this Code is stricter than local practice, customs, or law, you must comply with the Code. Questions about a possible conflict between local law or practice and the Code should be raised with your supervisor, the Law Department, or the Corporate Compliance Department.

“Each of us must respect and obey the governmental laws, rules, and regulations of the cities, states, and countries in which we operate.”
“Questions about a possible conflict between local law or practice and the Code should be raised with your supervisor, the Law Department, or the Corporate Compliance Department.”
“Everyone at LabCorp has a duty to adhere to this Code and promote this culture of integrity and compliance.”
How Does the Code Work?

This Code is designed to (1) deter wrongdoing, (2) promote honest and ethical conduct, (3) address compliance with applicable governmental laws, rules, and regulations, (4) enhance the well-being of LabCorp, its employees, and the community, and (4) foster full, fair, accurate and timely disclosure of concerns or violations. Everyone at LabCorp has a duty to adhere to this Code and promote a culture of integrity and compliance. To do so, it is critical that each of us:

**Strive to do what is right.**
Everything may not always be black and white, so you must exercise good judgment. If you observe or are asked to do something that seems improper, unlawful, or is contrary to LabCorp 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 manager, Divisional Senior Vice President, or the Law or Compliance Department 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, and maintain confidentiality.

**Not retaliate against anyone reporting a concern or violation.**
LabCorp prohibits retaliation of any form (whether by a manager, coworker, or anyone else) against someone who has made a good faith report of a suspected violation of this Code, LabCorp policy or applicable law or regulation.

This Code is a guide to overall conduct in our global operations. It is not a substitute for the detailed guidance provided in LabCorp’s Business Practices Manual or HIPAA Privacy and Security Manual, Human Resources, or other specific company policies. You should consult with the Corporate Compliance Department and the Business Practices Manual for further guidance and discussion of many of the topics addressed in this Code, and look to any specific policies of LabCorp’s various subsidiaries for guidance on specific topics and activities relevant to your responsibilities.
Those who violate this Code will be subject to such disciplinary action as LabCorp deems appropriate, up to and including discharge from LabCorp, 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.

• **Seek help from LabCorp resources.** In the event you do not feel comfortable approaching your supervisor with your question, or you have done so but still have a concern, discuss it with the Corporate Compliance Department or Law Department. Ask questions.

• **Always ask first, act later.** If you are unsure of what to do or uncomfortable in any situation, seek guidance before you act. Ask questions.

**Who Does the Code Apply To?**

This Code applies to all LabCorp employees, officers, directors, vendors, and contractors, including any consultants, who conduct business on LabCorp’s behalf. Each of us is obligated to read, understand, and follow all relevant company policies and procedures and this Code. Compliance is everyone’s responsibility.

**What Do I Do If I Know About a Violation of the Code?**

If you believe any violation of any laws, rules, regulations, or this Code has occurred, you must promptly report the violation. 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 supervisor or manager;
• contact the Law Department or the Corporate Compliance Department;
• speak with anyone else on the management team;
• call or email the compliance action line (described below).

Any supervisor or manager who receives a report of violation or potential violation of this Code or law must report it immediately to the Chief Legal Officer or the Corporate Compliance Department. Complaints made relating to accounting, internal accounting controls, or auditing matters will be forwarded to a member of the Corporate Internal Audit Department.

**What Do I Do If I Have a Question or Concern?**

For the Code to work properly, it is important to ask questions and voice concerns. LabCorp’s “open door” policy gives employees 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 we cannot anticipate 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 illegal, unethical, or improper, do not do it. If something makes you feel uncomfortable, do not do it. Ask questions.

• **Discuss the problem with your supervisor.** This is the basic guidance for all situations. In many cases your supervisor will be more knowledgeable about the question and will appreciate being brought into the decision-making process. Ask questions.
LabCorp has established a compliance action line (CAL), which can be used to ask questions or to report perceived illegal or unethical behavior and any violations of law, rules, or regulations of this Code. You can reach the hotline Monday-Friday from 8-5 Eastern Standard Time at: 800-801-1005 or by submitting an electronic report through the CAL form on OneWorld. This line may also be used to reach the Corporate Internal Audit Department to report a complaint regarding accounting or auditing matters. For employees located outside the United States, use our toll-free number + 800-1777-9999 or report online at www.LabCorp.com/globalactionline.

Any report made through these action lines or reporting portals will be taken seriously and investigated in full. Reports may be made anonymously, but we encourage you to provide your name and a thorough description of your specific concern in order to facilitate the investigation. Whether or not you provide your name, all reports 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 his or her own legal advice.

LabCorp will not discharge, demote, suspend, threaten, harass, or in any manner retaliate against any employee for good faith reporting of suspected or observed violations of this Code of Conduct and Ethics.

US Employees:
“You can reach the hotline Monday-Friday from 8-5 Eastern Standard Time at: 800-801-1005 or by submitting an electronic report through the CAL form on OneWorld.”

Employees outside the US:
+ 800-1777-9999
Respect For Each Other

A. ENVIRONMENT, HEALTH AND SAFETY
LabCorp strives to provide each employee with a safe and healthy work environment. Each officer and employee has responsibility for maintaining a safe and healthy workplace for all employees 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;
- taking all reasonable precautions when handling hazardous or unsafe materials.

B. EMPLOYEE PRIVACY
LabCorp respects the privacy rights of employees, as well as clients, vendors, and others with whom we work. LabCorp maintains the privacy of personal information about its employees, former employees, other members of its workforce, and job applicants, as well as vendors and other persons who share personal information with the company for employment or work-related purposes. (Protection of patient and study participant information is discussed later in this code.) LabCorp protects this information by requiring that all personal information in its possession is collected, processed, stored, and transferred with adequate precautions to maintain confidentiality. Access to this personal information is prohibited without authorization, only the amount of information necessary for an authorized purpose may be accessed, and any information accessed may only be used and disclosed for that authorized purpose and in accordance with all applicable laws and contractual commitments. Each employee whose work involves handling personal information is responsible for knowing and following the rules for access, use, disclosure, transmission, and storage of personal information.

C. EQUAL OPPORTUNITY EMPLOYMENT; NO DISCRIMINATION OR HARASSMENT
The diversity of LabCorp’s employees is a tremendous asset. We are firmly committed to providing equal opportunity in all aspects of employment and will not tolerate any illegal discrimination, harassment or retaliation of any kind. Violence and threatening behavior are not permitted. Examples include derogatory comments based on racial or ethnic characteristics or sexual preference and unwelcome sexual advances. This policy extends to all unlawful discrimination and/or harassment arising out of the work environment, whether at a LabCorp work site, a client or customer work site, at social functions, or elsewhere.
D. SUBSTANCE ABUSE AND TREATMENT
The health and safety of our employees is 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 LabCorp premises;
- possessing, selling, using, transferring, or distributing illegal drugs or controlled substances while working on LabCorp 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 your Human Resources manager to learn of available assistance programs.

Details regarding our drug testing policy are found in the applicable company handbook.

E. BACKGROUND AND EXCLUSION CHECKS
LabCorp employees, temporary workers, and certain contractors will be subject to background checks prior to hiring or placement, and periodically thereafter as allowed or required by law. Employees, temporary workers and contractors must immediately disclose any sanction or exclusion or other event that makes them ineligible from participation in any government-funded program or contract. Any person who is excluded from a government-funded program or contract is ineligible for continued service and will be subject to immediate termination.

F. ANTI-VIOLENCE
LabCorp 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.

Our company 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 the behavior of our employees engaged in LabCorp business anywhere in the world outside of our premises.

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

“LabCorp will not tolerate any illegal discrimination or harassment of any kind.”
A. COMPETITION AND FAIR DEALING
We compete fairly and honestly, providing only truthful information. We seek competitive advantages through superior performance, never through unethical or illegal business practices. 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. Each employee, officer and director should endeavor to respect the rights of, and to deal fairly with, LabCorp’s customers, suppliers, competitors and their affiliates and employees. No employee, officer or director should take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any other intentional unfair dealing practice.

B. BUSINESS COURTESIES AND GIFTS
The purpose of business entertainment and gifts in a commercial setting is to create good will and sound working relationships, not to gain unfair advantage with customers. Our customers include health care professionals (such as physicians) and entities (such as hospitals) and their employees, as well as pharmaceutical and device companies and their employees, and patients. Gifts or entertainment should never be offered, provided, solicited or accepted by any LabCorp director, officer, employee, or agent (or any family member of a director, officer or employee or agent) unless it: (1) is not a cash gift, (2) is consistent with customary business practices, (3) is not excessive in value, (4) cannot be construed as a bribe or payoff, and (5) does not violate any laws or regulations. Please consult the Client Expenses Policy and Anti-Corruption Policy in the Business Practices Manual for specific guidelines, and discuss with your supervisor any gifts or proposed gifts which you are not certain are appropriate.
C. PATIENT DATA PRIVACY AND SECURITY

Protecting the privacy and security of patient information is of paramount importance to LabCorp’s business and key to maintaining the trust of patients, study participants and clients. LabCorp requires that all members of its workforce and all vendors and contractors treat all patient information (including that of study participants) with the strictest confidentiality in accordance with all applicable laws, contractual commitments and ethical standards.

Only those employees, vendors, or contractors with specific authorization may access patient information. That access may be only for an authorized and permissible purpose, and only the minimum amount of patient information necessary for that purpose may be accessed, used and disclosed. Any access, use or disclosure not specifically authorized is strictly prohibited.

All employees, vendors, and contractors are required to protect the security of any patient information over which they have control or to which they have access. Every workforce member and vendor is required to know, understand and follow all information security policies and rules for the access, use, disclosure, transfer or maintenance of patient information.

Employees are required to immediately report to the LabCorp Privacy Officer any incident that may involve the unauthorized access to, or use or disclosure of, patient or study participant information.

“LabCorp requires that all members of its workforce and all vendors and contractors treat all patient information (including that of study participants) with the strictest confidentiality.”
A. 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 LabCorp, such that it may be or appear to be difficult for that person to perform his or her LabCorp 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 supervisor, manager or other appropriate personnel, the Corporate Compliance Department, Human Resources department, and/or the Board of Directors as appropriate and dependent upon to whom you feel comfortable reporting the conflict.

Employees should disclose any potential conflicts of interest to their local Human Resources Representative for guidance.

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 LabCorp’s time and assets for personal benefit;
4. Acceptance of gifts and entertainment;
5. Supervision of, or negotiation with, family members and others with whom you have a close personal relationship; or
6. Taking of potential LabCorp business opportunities for personal gain.

Other situations may also raise actual, potential, or apparent conflicts of interest (e.g. testifying as an expert witness). You should familiarize yourself with LabCorp’s Conflicts of Interest Policy in the Business Practices Manual, which provides more detailed information about potential conflicts. If you have any questions about whether an actual, potential, or apparent conflict of interest exists, you should contact the Human Resources Department.

B. CONFIDENTIALITY OF INFORMATION
Employees, officers and directors must maintain the confidentiality of information entrusted to them by LabCorp or its customers, except when LabCorp’s Chief Legal Officer or Law Department 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 LabCorp or its customers, if disclosed. It also includes information that suppliers and customers have entrusted to us. Confidential information may also include information regarding LabCorp’s competitors. The obligation to preserve confidential information continues even after employment with LabCorp ends.

C. EXTERNAL COMMUNICATION AND SOCIAL MEDIA PRESS: If an employee is contacted and asked to discuss company business with any members of the press, 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 the spokespeople designated in our Media Policy.

SOCIAL MEDIA: Employees, Officers and Directors may not post on social networking sites and blogs sensitive, proprietary, confidential or unpublished financial information about the company, or any Protected Health Information (PHI). Communicating confidential and/or proprietary information about the company or PHI is forbidden and is grounds for immediate termination. This prohibition does not apply to discussions regarding the terms and conditions of employment.
Employees may not use social networking to promote or advertise on behalf of LabCorp or its subsidiary companies without company approval. Federal Trade Commission regulations apply to publishing promotional content online including content designed to endorse, promote, sell, advertise or otherwise support the company and its products and services. Therefore, employees who engage in such social networking activities for personal purposes must indicate that their views are their own and do not necessarily reflect the opinions of LabCorp. Executives, officers, directors and managers have a special responsibility when posting communications since their opinions may still be deemed to express the position of LabCorp.

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

• state that the materials and opinions you are posting are yours and not the company’s;
• take every possible precaution to protect confidential information from disclosure;
• refrain from using any third party logos or trademarks without express permission.

D. PROTECTION AND PROPER USE OF LABCORP ASSETS

All employees, officers, and directors should protect LabCorp’s assets and use such assets appropriately. 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 LabCorp assets should be used for legitimate business purposes and should not be used for non-LabCorp business, though incidental personal use may be allowed by your supervisor. Employees should be careful to spend the company’s money wisely; 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 supervisor, the Travel Department or the Accounts Payable Department. Consult the Travel and Entertainment Policy for company requirements.
The obligation of employees, officers and directors to protect LabCorp’s assets includes protection of its 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 LabCorp policy. It could also be illegal and result in civil or even criminal penalties.

E. INTELLECTUAL PROPERTY
Always use our trademarks and other intellectual property properly.

LabCorp’s intellectual property is an invaluable asset that must be protected at all times. Intellectual property includes our trademarks, brands, logos, copyrights, inventions, patents 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 the Law Department. Furthermore, our trademarks should never be used in a degrading, defamatory or otherwise offensive manner.

Our intellectual property also includes employees’ work product. As a company employee, any work you create, in whole or in part, in connection with your duties, and/or using company time, resources or information, belongs to LabCorp. For example, inventions, ideas, discoveries, improvements, artwork, processes, designs, software or any other materials you may help to create or author in connection with your work for our company belongs to LabCorp. You should promptly disclose any invention related to our business, so that it may receive the same protection as other intellectual property of our company.

F. PERSONAL FINANCES
Employees, officers, and directors should manage their personal financial affairs so as not to reflect negatively on LabCorp. Employees are encouraged to meet their financial obligations on time and to maintain a good credit rating. Employees may not borrow from nor lend personal funds to customers or suppliers.

“The obligation of employees, officers and directors is to protect LabCorp’s assets including its proprietary information.”
G. PUBLIC SERVICE AND POLITICAL CONTRIBUTIONS

We encourage our employees to be active in the political and civic life of their communities, including charitable or educational activities. When doing so and making any public communication, you should clarify that your views are yours individually and are not being expressed as an employee of LabCorp. You may not engage in any type of solicitation or distribution activities not relating to the business of LabCorp on LabCorp’s premises without the approval of your immediate supervisor.

You may not make any political contribution as a representative of LabCorp, and you must also avoid lobbying activities or even the appearance of lobbying any governmental body or public official as a representative of LabCorp, in each case without the express approval of LabCorp’s Chief Compliance Officer.

No officer or employee shall make, authorize or permit any unlawful contributions, expenditure or use of corporate funds or property for political purposes. Employees must obtain approval from the Corporate Compliance Department 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.

“You may not make any political contribution as a representative of LabCorp, and you must also avoid lobbying activities or even the appearance of lobbying.”
A. CODING AND BILLING FOR MEDICAL ITEMS OR SERVICES
Each claim that LabCorp submits for payment or approval must be truthful, accurate, and contain appropriate codes reflecting the item(s) or service(s) that LabCorp has delivered or performed and must be properly documented. We bill only for items and services we provide. We timely correct any billing errors, and make timely refunds of any amounts determined to be due.

The requirement of truthful and accurate billing applies not only to billing of patients and payors (governmental and private entities) for health care items and services furnished, but also to billing of customers for clinical trial testing and other services provided.

B. RECORD KEEPING AND RETENTION
LabCorp requires honest and accurate recording and reporting of information to make responsible business decisions. LabCorp 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.

LabCorp strives to provide financial information to the public that is always accurate and not misleading. All of LabCorp’s books, records, accounts and financial statements must be maintained in reasonable detail, must appropriately reflect LabCorp’s transactions and must conform both to applicable legal requirements and to LabCorp’s system of internal controls.

All employees are responsible to report to LabCorp any questionable accounting or auditing matters that may come to their attention. 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 memos, and formal reports.

Company records, including e-mails, 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 the Law Department before disposing of any documents potentially relevant to any litigation or internal or governmental investigation.
“LabCorp strives to provide financial information to the public that is always accurate and not misleading.”
REGULATORY OVERSIGHT

A. SECURITIES REGULATION – INSIDER TRADING
LabCorp employees may not use insider information for personal gain, and any such improper use of this information may be a serious violation of US 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 LabCorp 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. A more detailed discussion of the insider trading laws can also be found in LabCorp’s Insider Trading Policy in the Business Practices Manual. If you have any questions, please consult LabCorp’s Chief Legal Officer or Law Department. The above restrictions on trading also apply to the securities of LabCorp’s customers, suppliers, partners, and any of their affiliates.

B. SECURITIES REGULATION – RULES FOR PRINCIPAL EXECUTIVE OFFICER AND SENIOR FINANCIAL OFFICERS
In addition to complying with all other parts of this Code, if you are LabCorp’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 LabCorp’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 LabCorp files with, or submits to, the Securities and Exchange Commission (SEC) and in other public communications made by LabCorp.

C. ANTI-CORRUPTION AND BRIBERY – PAYMENTS OR GIFTS TO OBTAIN AN IMPROPER BUSINESS ADVANTAGE
Corruption undermines our integrity and values, and also 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. We strictly prohibit making or asking for any payments to obtain an improper business advantage, whether to or from government officials or commercial entities. Because payments (and other things of value) to government officials of any country require particular care, we strictly prohibit these without first obtaining prior review and written approval by the Chief Compliance Officer or his designee.

“All non-public information about LabCorp should be considered confidential information.”
The US 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 in order to obtain an improper business advantage. Other countries have enacted similar restrictions, such as the United Kingdom’s Bribery Act, that cover both public and private sector employees.

The US government also has laws restricting business courtesies and other payments that may be provided to government personnel. Most state and local governments have similar rules. The promise, offer, or delivery to an official or employee of any government of a gift, favor or other payment in violation of these rules would not only violate LabCorp policy but could also be a criminal offense.

D. KICKBACKS INVOLVING HEALTH CARE PROVIDERS

We do business with health care providers (such as physicians and hospitals) who order or purchase our services and who also order or purchase products and services from our pharmaceutical and device company customers. In the US, our business dealings must be conducted in accordance with federal and state laws that prohibit the provision of anything of value to induce or reward patient referrals or the order or purchase of products and services that may be paid for by federal health care programs such as Medicare and Medicaid. Business dealings with health care providers, including any discounts, must be at fair market value, and negotiated at arms-length consistent with LabCorp policy. Employees are forbidden from offering any sort of payment, gift, or any other compensation to health care providers in order to influence them to refer or prescribe treatment (whether provided by LabCorp or by its pharmaceutical and device company customers) payable by federal health care programs. Employees may not provide anything of value to any health care provider except pursuant to the LabCorp Client Expenses Policy in the Business Practices Manual, or upon the prior written approval of the Law Department or Corporate Compliance Department, and must properly document any approved expenditures.
The relevant statutes provide for both civil and criminal penalties for violations of these laws, including exclusion from participation in US government health care programs. Other countries increasingly have similar restrictions with which employees must comply.

E. US FEDERAL AND STATE PROHIBITIONS AGAINST FALSE AND FRAUDULENT CLAIMS

In the US, our services may be billed to government health care programs such as Medicare and Medicaid as well as to other government programs for contracted services. The federal False Claims Act (FCA) and the laws of many US states contain specific prohibitions against the submission of false or fraudulent claims to these government health care programs and provide for the imposition of civil, criminal and administrative penalties. Actions that violate the FCA include: (1) submitting a false claim for payment, (2) making or using a false record or statement to obtain payment, (3) conspiring to make a false claim or get one paid, or (4) making or using a false record to avoid payments owed to the government.

Individuals may bring qui tam actions asserting civil false claims under the FCA. A qui tam action is a lawsuit filed under seal in court by a private citizen on behalf of the United States. The government investigates the allegations in the complaint and decides whether it will join the action, in which case the Department of Justice or comparable state agency takes the lead role in prosecuting the claim. If the government decides not to join, the qui tam relator may pursue the action alone. Qui tam relators are also offered certain protections against retaliation for bringing an action under the FCA. Employees who bring a qui tam action against an employer may not be discharged, demoted, harassed, or otherwise discriminated against for bringing forth such an action in good faith.

F. CLINICAL RESEARCH – PHARMACEUTICAL AND DEVICE DEVELOPMENT

LabCorp complies with all applicable food, drug, and cosmetic laws, regulations and standards. LabCorp is committed to testing drugs and devices and to conducting clinical studies in compliance with all applicable laws, rules, and regulations, including the United States Food, Drug, and Cosmetic Act and the International Conference on Harmonization Guidelines. LabCorp maintains and follows standard operating procedures implementing FDA standards for Good Laboratory Practices, Good Manufacturing Practices, and Good Clinical Practices, as applicable.

In addition, where applicable, LabCorp complies with the rules of the Clinical Laboratory Improvement Act (CLIA) and adheres to other regulatory and professional association requirements for pathology and clinical laboratory testing.

It is fundamental to LabCorp’s integrity that we assure the integrity of the results and data provided to clients, as well as of the services we provide. Each LabCorp employee is responsible for adhering to all applicable LabCorp Policies and Procedures [SOPs], and complying with all applicable laws, regulations, and standards governing clinical studies.

LabCorp also complies with all applicable local, state, federal, and international laws concerning the care, treatment, and use of animals in biomedical research, including the United States Animal Welfare Act and the laws of the European Community. LabCorp maintains and follows standard operating procedures to achieve compliance with these requirements.

G. FAIR COMPETITION AND ANTITRUST

LabCorp complies with all applicable antitrust and competition laws. These laws are intended to foster competition and encourage LabCorp and its competitors to compete fairly and aggressively in the marketplace. To maintain robust and fair competition, these laws generally forbid (1) any explicit or implicit agreements – especially with competitors – that unreasonably limit competition; and (2) improper actions to create or maintain monopolistic power. Agreements need not be in writing and do not require any formal acknowledgment. Employees 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. Employees should consult with the Law Department or Corporate Compliance Department before attending any meetings likely to facilitate communication with competitors.
H. INTERNATIONAL TRADE AND SANCTIONS
With LabCorp’s global reach, employees dealing in international trade must be aware of the United States’ restrictions on trade with foreign entities, as well as any restrictions on trade in other countries in which we do business. Employees should be aware of import and export laws and other regulations restricting trade with certain countries. Further guidance is provided in LabCorp’s International Trade Law Policy in the Business Practices Manual. If you are concerned about the dealings with any particular entity or to seek further clarification about these restrictions, you should consult the Corporate Compliance Department or Law Department.

I. HUMAN RIGHTS
LabCorp 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, LabCorp 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;
- address the human rights and environmental issues connected with the mining and trading of Conflict Minerals.

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

Administration

Board of Directors
The Board of Directors, through the Audit and Quality and Compliance Committees, 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 health care 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.

Officers, Managers and Supervisors
All officers, managers and supervisors shall be available to answer questions about this Code with their employees. Officers, managers and supervisors are also responsible for the diligent review of practices and procedures in place to maintain compliance with this Code.