

CODE OF ETHICS

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I. CODE OF ETHICS

A. Introduction

CAMRIS believes it is not only important to follow the laws and regulations, but also to take it one step further and do the right thing in every situation.

CAMRIS employees hold an important role in supporting our nation's public health, military medicine, and international development efforts. CAMRIS' reputation is dependent upon the behavior of our employees. Therefore, we expect a high standard of conduct from all employees regardless of their position at CAMRIS. By reinforcing and improving our ethics program, CAMRIS continues to strengthen its reputation for upholding the highest standards of compliance, honesty, integrity, and ethical conduct.

We take every reasonable measure to ensure that our business practices are ethically sound. We have developed this detailed Code of Ethics for our employees, and it is also available to our customers, suppliers, subcontractors, and sponsors.

The Code of Ethics applies to all employees, whether full, part-time, or temporary, of CAMRIS and its subsidiaries and affiliates worldwide. For the purposes of this Code of Ethics, "CAMRIS" shall include CAMRIS' sister company Topsail Professional Services, LLC.

The Code of Ethics addresses many of the policies and ethics issues that may arise in the workplace. It attempts to provide guidance that you can use for each ethics question that you may face related to your CAMRIS employment. The Code of Ethics cannot, however, address every issue that arises in the workplace; rather, it sets forth CAMRIS' general policies and guidelines (subject to modification from time to time at CAMRIS' discretion).

One simple rule stands above all others: Do the right thing–and if in doubt about the right thing to do, stop and ask.

In addition to referring to CAMRIS' Code of Ethics, Policies, and Employee Handbook, CAMRIS provides several channels through which employees can seek counsel or disclose ethical issues. You may seek advice from your supervisor, or CAMRIS' Ethics and Compliance team or Legal department regarding any ethics question or if you encounter any situation that you believe compromises our principles of compliance, honesty, integrity, or ethical conduct. Contact information appears below.

Ethics Contact Information

Questions, concerns, or notifications may be sent to compliance@camris.com, drosney@camris.com, or rsweetland@camris.com. Alternatively, you may contact CAMRIS Human Resources Manager at 240-752-9860 or CAMRIS' President and Chief Ethics and Compliance Officer (CECO) Rodney Sweetland at (301) 770-6000, extension 136. If any issue involves CAMRIS' CECO, please contact HJF General Counsel and Secretary William "Buddy" B. Kinner at wkinner@hjf.org or (240) 694-2061. If you prefer to remain anonymous, you may leave a message on our Ethics hotline at 301-770-6000, extension 133.

You may also contact the Ethics resources of CAMRIS' parent company, the Henry M. Jackson Foundation for the Advancement of Military Medicine (HJF) anytime - 24 hours a day, 7 days a week, 365 days a year to report a concern and can choose to make the report as an anonymous party. Call HJF Ethics Anonymous Hotline at 1-866-687-2321 or contact via the web at https://hjf.ethicspoint.com.

Whistleblower Protection – A "Whistleblower" is a term used to describe individuals or entities that report alleged wrongdoing. It is a violation of CAMRIS policy for an employee to be disciplined, lose his or her job, or be retaliated against in any way for asking questions, voicing concerns, or reporting possible violations concerning legal or ethical obligations, so long as the employee acted in good faith. "Good Faith" does not mean the employee has to be right but does mean the employee is truthful and believes that the information provided is accurate.

B. Responsibilities

Federal and state laws and regulations regulate the business community in the United States. CAMRIS must operate within the most comprehensive contractual and legal system in the world because CAMRIS performs work for the United States Government. Your attention and assistance to the matters set out in this Code ensure that CAMRIS obeys all requirements. It also helps ensure that you do not face any prosecution or other adverse action based on your violating a law, regulation, or CAMRIS policy.

CAMRIS employees have the values and common sense to do the right thing without the following express guidance. Because the topic is so important for you and CAMRIS, however, it is worth your time to review this Code of Ethics. Employees are required to report to their supervisor, manager, Legal Team, or other appropriate personnel about observed illegal or unethical behavior. Failure to report such existing or potentially wrongful behavior is itself a violation of the Code.

If, after reading the applicable section, you have any questions or are still in doubt about any aspect of the proper course of action, stop, and ask.

1. Kickbacks

CAMRIS employees may not ask for or accept any type of kickback from any supplier, subcontractor, or sub-awardee, or from any employee of a supplier, subcontractor, or sub-awardee. CAMRIS employees may not offer a kickback to any customer or employee of a higher-tiered contractor, subcontractor, or sub-awardee.

- "Kickback" means any money, fee, commission, credit, gift, gratuity, thing of value, or compensation of any kind which is provided, directly or indirectly, to any third party including, but not limited to, any vendor, vendor employee, prime contractor, prime contractor employee,

subcontractor, or subcontractor employee for the purpose of improperly obtaining or rewarding favorable treatment.

- Kickback can include meals, money, souvenirs, gift certificates, invitations to attend or participate in any entertainment, sporting, hunting, or another event, or any other item of any value. Furthermore, any amount paid to a CAMRIS employee for an item that is greater than the item's fair market value could be considered a kickback.

- For purposes of this rule, the terms "supplier," "subcontractor," and "sub-awardee" include both current and potential suppliers, as well as both current and potential subcontractors and sub-awardees at any tier (above or below CAMRIS). A "subcontractor" or "supplier" is a subcontractor or supplier who provides any good or service required by CAMRIS for the performance of a government contract, grant, or cooperative agreement, or of a subcontract or sub-agreement at any tier below a government contract, grant, or cooperative agreement. "Potential" includes any company or individual that does not currently do business with CAMRIS but is soliciting or attempting to solicit CAMRIS' business.

- Offering or accepting kickbacks is a crime, and CAMRIS will address kickback-related activity with the seriousness it deserves. Moreover, in some circumstances, CAMRIS has the obligation to report employees engaging in kickback-related activity to federal or state authorities, or both.

  Example: *Supplier S invites the employees in CAMRIS' Purchasing Department on a deep-sea fishing trip, completely paid for by Supplier S. Supplier S provides all of the food, drinks, and anything else necessary for the event. If the supplier's purpose in providing this fishing trip for the buyers is to obtain favorable treatment in connection with a contract or purchase order, then that supplier violated the rule against kickbacks. Even offering to provide the outing violates the rule against kickbacks, whether or not a CAMRIS employee accepts the offer. Additionally, if a buyer accepts this offer, then the buyer also violates the rule against kickbacks. Under these circumstances, government enforcement officials are likely to view any favorable action by Purchasing Department personnel toward Supplier S as evidence of a violation.*

2. Gifts and Business Courtesies Offered to U.S. Government Employees

It can be a federal crime to offer a gift or business courtesy to a U.S. Government employee. Therefore, CAMRIS employees may not offer any gift or business courtesy to a contracting officer, grants officer, or another government employee, except with the prior approval of the CECO. It can be a federal crime to offer a gift or business courtesy to a government employee.

a. Gifts and business courtesies of any value may never be given to or received from U.S. Government personnel for the purpose of influencing business decisions.

b. Federal regulations do permit the remittance or acceptance of gifts and business courtesies of nominal value if they are not given for the purposes of influencing official action, but an employee need not intend to obtain favorable treatment to appear to violate this rule. Therefore, except as expressly authorized in advance by the Compliance Team or the Legal Department, CAMRIS employees may not offer a gift or business courtesy to any government employee directly or indirectly under any circumstances, regardless of the intent or value.

c. Federal regulations authorize the giving of occasional de minimis refreshments, such as soft

drinks, coffee, and doughnuts, so long as they are not part of a meal. Such items are not usually considered gifts or business courtesies that must be tracked for purposes of the $50 per year aggregate limit.

d. Gifts and business courtesies to a government employee's "parent, sibling, spouse, child, or dependent relative" are counted as gifts and business courtesies to the government employee and are prohibited except as expressly authorized in advance by the CECO or the Legal Department.

e. CAMRIS and its employees may not knowingly make any cash or in-kind payment to a government employee or to the federal government that is prohibited by law or regulation.

3. Gifts and Business Courtesies Offered to any Foreign Official

If a law or regulation prohibits a government employee from receiving a payment, CAMRIS policy prohibits CAMRIS employees from making the payment (directly or indirectly) even if the law or regulation does not directly apply to CAMRIS. For example, laws and regulations generally prohibit payments to foreign government officials. If an employee of a foreign government-owned entity (e.g., health ministry official, professor at a state university, etc.) asks a CAMRIS employee for payment (or a "honorarium") to attend a company-sponsored event, the employee should decline or seek guidance from the Legal Department.

4. Gifts and Business Courtesies Offered to CAMRIS Employees by Entities and Individuals Having a Business Relationship with CAMRIS

CAMRIS employees may not accept gifts or business courtesies from any entity which has a business relationship with CAMRIS – including any supplier or subcontractor, any employee of a supplier or subcontractor, or from any potential supplier, or subcontractor or their employees, at any time, except for occasional meals, souvenirs, mementos, and promotional items of nominal value.

a. Gifts include anything of monetary value, which you obtain for less than the fair market value. The gift might be tangible or intangible. Gifts might also include gift cards of the type that are redeemable only at one store or at a group of affiliated stores.

b. Business courtesies include, but are not limited to, the following: any favor, entertainment (attendance at a non-business event, such as a sporting event, golf tournament, social gathering, etc. where the giver accompanies the recipient), services, transportation, lodgings and meals, admittance to a business-related event (conference, briefing, seminar, training – vendor and non-vendor related, advisory board, committee meetings, etc.), door prizes and raffles, loans, as well as benefits and discounts not available to the general public or provided at below fair market value.

c. CAMRIS prohibits its subcontractors and suppliers from giving or receiving gifts in the form of cash or other cash equivalents, such as pre-paid credit cards, certificates, and promotional codes that function as cash, virtual currency, and the like.

d. Nominal value means a gift or business courtesy that is $20 or less in fair market value per source per occasion, or $50 aggregate market value in any calendar year. Gifts and business courtesies that have been purchased/obtained from a collection of contributions (cash or cash equivalents, and the like) cannot be used to bypass the nominal value threshold.

e. "Meals, souvenirs, mementos and promotional items of nominal value" is a very narrow window of acceptability. Remember, an item must be both a meal, souvenir, memento, or promotional item and of nominal value for the employee or for CAMRIS to accept it.

   i. Example: A six-pack of beer may be of nominal value, but it does not fall within the definition of meal, souvenir, memento, or promotional item. It is not an acceptable gratuity.

   ii. Example: If a buyer were the best man at a subcontractor-friend's wedding and reception, CAMRIS would likely approve the buyer's accepting the gift normally given to the best man as well as food and drink on this occasion. There is little likelihood of an appearance of impropriety.

f. The fact that an offer of a gratuity is phrased in a way to benefit a group of employees or CAMRIS as a whole, as opposed to benefiting an individual CAMRIS employee, does not change the rule or the exception. If a contractor or supplier desires to make a donation of any kind to CAMRIS, contact the CECO or the Legal Department for guidance.

Only the CECO can waive CAMRIS policy prohibiting gifts and business courtesies. Each such waiver is only for the single specific purpose stated in the written approval.

5. Gifts Between Company Employees

CAMRIS employees may give gifts to and receive gifts from other CAMRIS employees so long as there is no actual or perceived conflict of interest and the gift is of nominal value. It may be appropriate to give a higher value gift in honor of significant life events or career milestones. Prior review and approval by the CECO are required in these circumstances.

Except as noted below, CAMRIS employees cannot give (or contribute toward) a gift for a person above them in their supervisory chain.

- On special, infrequent occasions, such as life events (marriage, birth of a child, retirement), a CAMRIS employee may give a superior a gift appropriate to the occasion.

- On annual occasions where gifts are traditionally given (birthdays, winter holidays), a CAMRIS employee may give a person above them in their supervisory chain, items valued at $10 or less, or items, such as food and refreshments to be shared in the office.

- On annual occasions where gifts are traditionally given (birthdays, winter holidays), a CAMRIS employee may give a person above them in their supervisory chain, items valued at $10 or less, or items, such as food and refreshments to be shared in the office.

- There may be other circumstances where gifts may be permissible to those in an employee's supervisory chain. The CECO must review individually and in advance any consideration for such exceptions.

6. Gifts of Free Attendance at Widely Attended Gatherings

CAMRIS may offer a U.S. Government employee a gift of free attendance at a widely attended gathering that it is not sponsoring only if the event is expected to be attended by more than 100 persons and the

value of the gift of free attendance does not exceed $390. The Government employee remains responsible for obtaining approval to accept the gift from his or her designated agency ethics official.

CAMRIS may offer a U.S. Government employee a gift of free attendance at a widely attended gathering that it is sponsoring so long as it is not offered to influence business decisions.

Any gift of free attendance must be approved in advance by the CECO. For non-government employees, the nominal value threshold applies unless the CECO makes an exception.

This is not an exception to Section 3 on offering gifts (including free attendance at widely attended gatherings) to foreign officials.

7. Accuracy of Information

CAMRIS employees are required to make accurate entries in books and records and to be truthful and accurate when making statements related to CAMRIS business.

CAMRIS employees are prohibited from making any false or fraudulent entry in the company's books or records. CAMRIS employees are also prohibited from making any type of false statement, written or otherwise, to any other CAMRIS employee, supplier, governmental official, or any other person in connection with any contract, subcontract, cooperative agreement, grant, sub-award, or company record.

False or artificial entries include backdating documents, altering data to make research results look better than they are, and tampering with or making false or incomplete entries on timesheets. A document's credibility comes from a reliable process of creating it. The rush of business can sometimes cause errors in paperwork. Correcting such errors is encouraged but doing so in a manner that makes the form look as if it were done properly and timely the first time is not an authorized way to fix the error. For example, when possible, cross out and initial corrections instead of erasing or using a new blank form.

It is a federal crime to falsify a document or to make any other false statement, written or oral, in connection with a government contract, grant, or cooperative agreement.

8. Combating Human Trafficking

CAMRIS has a zero-tolerance policy regarding trafficking in persons. CAMRIS employees are prohibited from engaging in trafficking in persons, procuring commercial sex acts, and using forced labor in the performance of a government contract or award.

a. Human trafficking is generally defined to include any conduct or condition that involves sex trafficking or involuntary servitude.

b. A commercial sex act is where anything of value is given in exchange for a sexual favor. CAMRIS employees are prohibited from procuring commercial sex acts, even in a jurisdiction where it may be lawful, during the period of performance of a government contract.

c. Forced labor generally includes any circumstances where labor or services are obtained from a person using acts or threats of harm to the person or their family, physical restraint, or abuse of the law or legal process.

d. Other examples of human trafficking tactics, which are forbidden by federal law and CAMRIS

policy, include the confiscation of documents (e.g., passports, immigration documents, or other forms of identification); withholding of pay, such that individuals do not feel free to leave their working environment; coercion or threats of bodily harm to the worker or her/his family; inhumane working or living conditions; and inadequate food or medical care. No CAMRIS employee or vendor may charge or be charged recruiting fees or engage in fraudulent or misleading recruitment practices.

Any CAMRIS employee who becomes aware of any CAMRIS employee, agent, or subcontractor, to the lowest tier, engaging in any tactic or form of human trafficking, has a responsibility to report the suspected activity to jbejarano@hjf.org or https://hjf.ethicspoint.com. Alternatively, you may contact the Global Human Trafficking Hotline at (844) 888-3733 or help@befree.org.

Under no circumstances will any CAMRIS employee suffer any form of reprisal or retaliation for good faith reporting or whistleblowing on trafficking in person violations, any activity that violates the Federal Acquisition Regulation (FAR), the Defense Acquisition Regulation Supplement (DFARS), the Executive Order on Combating Trafficking in Persons, or the CAMRIS Policy on Combating Trafficking in Persons. Additional information about trafficking in persons can be found on the website for the Department of State's Office to Monitor and Combat Trafficking in Persons.

If you ever have reason to believe that any individual or entity related to CAMRIS, including, by way of example, an employee, subcontractor, agent, or vendor, is promoting, supporting, or participating in any tactic related to trafficking in persons, consult your supervisor, the Legal Department, or the CECO without delay.

9. Customer Property

CAMRIS employees may use customer-furnished property only in a manner specifically authorized by their supervisors.

From time to time, the U.S. Government or other customer delivers its property to CAMRIS for use in connection with CAMRIS contracts. While in the custody of CAMRIS, all such customer property must be strictly accounted for until it is returned to the customer or otherwise disposed of at the customer's direction. To prevent the incurrence of civil and criminal penalties by both CAMRIS and its employees, CAMRIS employees must not use customer property in any manner other than as directed by the employee's supervisor. In no case may such customer-furnished items be used for any purpose other than in connection with the contract for which the property was provided.

If you are ever unsure of whether a piece of property is government or other customer property or whether your use of it would constitute unauthorized use, consult your supervisor or the CECO.

10. Confidential Information or Private Data

a. CAMRIS employees will protect the confidentiality of trade secrets and other proprietary or confidential business information.

   CAMRIS employees may not use or disclose the trade secrets or other proprietary or confidential business information of CAMRIS or other entities (including any employee's former employers) except as specifically authorized. It is critical to the future of CAMRIS that CAMRIS' trade secrets and other proprietary or confidential business information remain confidential. Likewise, it is critical to CAMRIS' relationship with the government and with other companies that

CAMRIS protect any trade secrets and proprietary or confidential business information that those entities have entrusted to CAMRIS.

CAMRIS is subject to numerous confidentiality agreements, contracts in support of the Federal Government, and other agreements that prohibit disclosure of confidential business information. Employees must comply with such agreements and must keep such information strictly confidential at all times.

i. While sensitive information may be marked, employees must protect all such information, whether it is marked or not.

ii. Confidential information includes, but is not limited to pricing, business terms, and other confidential information contained in grants, contracts, and cooperative agreements; applications and proposals prepared by or for CAMRIS; tax records; information about present or future services, including marketing plans, strategies, forecasts, blueprints, specifications, programs, ideas, customer lists, vendor lists, pricing structures, marketing and business plans, strategies, budgets, projections, licenses, prices, costs, and financial data; patentable inventions and related products and licenses; and documentation related to the foregoing, including electronic documents and computer programs.

Nothing herein prohibits employees from reporting possible violations of federal law or regulation that are protected under applicable whistleblower provisions, and you are not required to seek authorization from or provide notification to CAMRIS of any such reports or disclosures.

b. CAMRIS employees shall not disclose to a supplier or potential supplier any information concerning the bid, bidding techniques, or operations of another supplier or potential supplier.

Information regarding suppliers must be kept strictly confidential from other suppliers to maximize competition and preserve the integrity of the bidding process for CAMRIS subcontracts and purchases. Suppliers should be able to disclose information to CAMRIS and know that such information will not be misused.

c. CAMRIS employees shall not attempt to obtain any proprietary or source selection information, directly or indirectly, from any government employee during the conduct of a government procurement. No CAMRIS employee will discuss future employment or business opportunities with any government employee either during the procurement or the contract administration.

Such conduct can be, or appear to be, an attempt to obtain "inside information," which might expose both the employee and CAMRIS to allegations of Procurement Integrity Act violations. The "conduct of a government procurement" begins on the earliest date of specific governmental action on a procurement, such as drafting a specification or statement of work or developing a procurement or purchase request. This conduct period ends with the award of the contract or cancellation of the solicitation.

d. CAMRIS employees will protect information of a personal nature concerning current and former employees of CAMRIS, also known as personally identifiable information.

Employees must protect all such information, whether it is marked or not. This information includes, but is not limited to, social security numbers, home addresses, home telephone numbers, dates of birth, information and evaluations concerning employee performance and disciplinary action, and employee compensation data.

e. Employees must not: (1) use any of the foregoing information for personal benefit, (2) disclose or authorize the disclosure of such information to anyone not employed by CAMRIS without specific authorization from the employee's supervisor, or (3) disclose such information to anyone employed by CAMRIS other than persons with a reasonable need to know for the performance of CAMRIS duties. Employees are required to take all reasonable precautions to protect against the intentional, negligent, or inadvertent disclosure of such information to any other person or entity.

One cardinal rule should be remembered when contemplating disclosure of information: If in doubt about the propriety of a disclosure, stop and ask before making the disclosure.

11. Inside Information

CAMRIS employees shall not use or disclose material nonpublic information obtained as a result of an association with CAMRIS.

Employees will not engage in "insider trading" or participate in any communication or activity that involves or appears to involve the direct or indirect use of "inside information" to obtain any gain for themselves or others.

"Insider trading" can generally be defined as personally using nonpublic information to trade in securities or using that information to "tip" others so that they may trade in securities based on that information. "Inside information" is information obtained as a result of being a CAMRIS employee that is not generally available to the public.

> ***Example:*** *Assume a CAMRIS employee overhears the vice president of a CAMRIS supplier tell a CAMRIS vice president that the government is placing a substantial order for 1,000 additional units on an existing contract. Assume also that the supplier is a publicly-traded company. Neither the CAMRIS employee nor the CAMRIS vice president could use that information to buy stock in that supplier, nor could either of them share that information with relatives, friends, or anyone else except CAMRIS employees who need to know the information to perform their duties at CAMRIS.*

> ***Example:*** *A CAMRIS employee learns that a co-worker is engaged in an undiscovered scheme to receive additional expense reimbursement. The CAMRIS employee does not participate in the scheme and does not report it. Six months later, the contract the CAMRIS employee is working on is in the midst of the re-bid process. Upon invitation, the CAMRIS employee agrees to take lunch with a competitor employee. During the lunch, the competitor employee prods the CAMRIS employee to open up about anything scandalous occurring under the contract. Under this example, the CAMRIS employee should have reported the scheme to their supervisor or the Legal Department immediately. Under no circumstances should the CAMRIS employee disclose confidential company matters to a third-party without prior clearance from the Legal Department.*

12. Improper Influence

CAMRIS employees are prohibited from using their positions to induce, coerce, or in any way influence any person, including subordinates, to provide any unauthorized benefits, financial or otherwise, to themselves or others.

Example: *A supervisor cannot order an employee whom he supervises to mow the lawn at the supervisor's house.*

"Improper influence" also includes threatening or taking steps to prevent an employee from reporting information to a government agency or to the CECO, and it includes any retaliation against an employee solely based on such reporting.

13. Employment Discrimination

All CAMRIS employees will comply with the CAMRIS Equal Employment Opportunity Policy and with all requirements of applicable federal, state, and local laws.

CAMRIS offers equal employment opportunities for all persons, regardless of race, creed, color, sex, sexual orientation, religion, marital status, national origin, age, veteran status, disability, or any other class protected by state or local laws applicable to the employee's work location. CAMRIS employees are prohibited from engaging in any form of unlawful employment discrimination.

The Human Resources Manager serves as the Equal Employment Opportunity (EEO)/Affirmative Action Officer for CAMRIS. Employees with EEO-related questions, problems, or complaints should contact the Human Resources Manager.

14. Sexual and Other Forms of Harassment

All CAMRIS employees will comply with CAMRIS' Harassment Policy and with all requirements of applicable federal, state, and local laws.

CAMRIS supports a productive work environment free from any employee conduct that harasses, disrupts, or interferes with the work performance of another employee of CAMRIS. CAMRIS employees are prohibited from any verbal, visual, or physical conduct that creates an intimidating, offensive, or hostile work environment at CAMRIS.

The Human Resources Manager serves as the Equal Employment Opportunity (EEO)/Affirmative Action Officer for CAMRIS. Employees who suspect sexual or other forms of harassment should report the incident(s) to the Human Resources Manager and provide details of the complaint and the remedy requested.

15. Drug-Free Workplace

CAMRIS employees will comply with CAMRIS' drug-free workplace policy and with all requirements of applicable federal, state, and local laws.

CAMRIS is required to maintain a drug-free workplace. Illegal drug use by an employee is incompatible with CAMRIS' standards of employee conduct and performance. Moreover, drug use in the workplace could adversely affect safety, risk damage to CAMRIS and personal property, and significantly impair day-to-day operations.

16. Lobbying Restrictions

a. CAMRIS employees may not use CAMRIS funds for political contributions.

It is unlawful and against CAMRIS policy for CAMRIS or any CAMRIS employee to use CAMRIS funds to make any direct or indirect contribution to political parties, candidates, or political action committees.

b. CAMRIS employees may not engage in lobbying activities unless specifically authorized by CAMRIS management.

   Because lobbying and lobbyists are heavily regulated by federal and state laws, and because CAMRIS' parent company is a 501(c)(3) tax-exempt organization subject to significant Internal Revenue Code restrictions on its lobbying activities, no CAMRIS employee shall engage in activities on behalf of CAMRIS that could be construed as lobbying without specific authorization from CAMRIS management. Such authorization generally will be granted only after consultation with the CECO of CAMRIS because the legal repercussions of improper activities in this area can be severe.

c. CAMRIS employees may not use federally appropriated funds for certain lobbying activities.

   In addition to the general restrictions on CAMRIS lobbying activities, federal procurement law specifically prohibits the recipient of a federal contract, grant, loan, or cooperative agreement from using appropriated funds to pay anyone for influencing or attempting to influence government or congressional personnel in the awarding or modifying of any federal contract, grant, loan, or cooperative agreement. Federal law also requires the offeror or recipient to furnish a declaration consisting of a certification and a disclosure to be submitted during the procurement process. Employees must use caution to ensure that appropriated funds are not used for any prohibited lobbying activities and that all certifications and disclosures are accurate.

17. Unauthorized Statements or Commitments Concerning CAMRIS Agreements

Only specifically authorized CAMRIS employees may commit CAMRIS to any agreement, including, but not limited to, any contract, subcontract, cooperative agreement, grant, subaward or non-disclosure agreement.

Unauthorized employees will not commit or attempt to commit the CAMRIS to any agreement. Such unauthorized commitments are serious matters, and CAMRIS will address them accordingly. If you are not sure whether you have appropriate authority, **ask first**.

18. Corporate Espionage

CAMRIS employees will gather information only in a lawful manner.

CAMRIS employees may not gather information from competitors in an improper manner, nor may a CAMRIS employee improperly obtain, attempt to obtain, or accept proprietary, private or competition-sensitive information from competitors or from the government.

CAMRIS employees may not resort to unfair or unreasonable tactics to gain information on competitors or subcontractors for any reason. Legitimate public sources of information (i.e., those that would be available to anyone) may be used.

If you have questions about what may be "improper" or "unfair," consult your supervisor or the CECO.

As a general rule, if the contemplated information-gathering technique involves telling any type of lie, or breaking any type of rule or law, then that technique is improper.

19. Unfair Competition

No CAMRIS employee may enter into any type of agreement or contract that unreasonably restrains trade.

a. Any agreement entered into by an employee with a supplier or other outside party (or in some cases, another CAMRIS employee) that serves to hinder free competition in bidding for prime agreements or in bidding for CAMRIS subcontracts or sub-awards may be a violation of federal antitrust laws that could expose CAMRIS and the employee to criminal penalties, including prison sentences.

b. Taking kickbacks from a supplier, offering kickbacks to a customer or to a government employee, disclosing confidential information about one supplier to that supplier's competitors, or awarding a subcontract on any basis other than legitimate business reasons may be antitrust violations because such actions serve to restrain fair and equal competition.

c. For purposes of this rule, an "agreement" need not be in writing or even explicitly stated between the actors. If there is an unspoken understanding between the CAMRIS employee and the other party that the party will receive preferential treatment from the CAMRIS employee, then an antitrust violation may have occurred.

d. If an employee believes that any existing or contemplated future arrangement with any person or entity may hinder free competition unfairly or unreasonably, the employee should notify his supervisor or the CECO immediately.

20. Copyright

CAMRIS recognizes and respects intellectual property rights, including copyrights. CAMRIS employees shall not violate a copyright.

As part of our goal of maintaining the highest ethical standards of conduct, we are committed to fulfilling our legal obligations concerning the use of copyrighted works.

Original works are copyright-protected under U.S. law, even if they are not registered with the U.S. Copyright Office and even if they do not carry the copyright symbol (©).

The consequences of not complying with copyright law can be very costly, both for CAMRIS and for the individual employee who violates the law. As a matter both of ethical integrity and of adherence to U.S. copyright law, CAMRIS sets forth the following policies:

a. No employee of CAMRIS may reproduce any copyrighted work in print, video, or electronic form in violation of the law, and the easiest way to comply is by receiving the express written permission of the copyright holder. Copyrighted works include, but are not limited to, printed articles from publications, TV and radio programs, videotapes, music performances, photographs, training materials, manuals, documentation, software programs, databases, and World Wide Web pages. In general, the laws that apply to printed materials are also applicable to visual and electronic media (e.g., diskettes, CD-ROMs, and World Wide Web pages).

b. Employees must obtain permission from the copyright holder (or its licensing representative) whenever reproduction or duplication exceeds "fair use" as that term is defined in the copyright law. Determining what a "fair use" is often a complex legal question, and employees are required to consult CAMRIS' CECO on all questions involving copyright procedures, including the question of what constitutes fair use.

c. If CAMRIS needs a copyright license for you to take some action that you contemplate, contact the CECO.

Remember, when in doubt, stop and ask before taking action that might violate a copyright.

21. Research Protocols

CAMRIS employees are required to follow approved human and animal use protocols. CAMRIS employees are also required to obtain the appropriate review and approval for such protocols.

Research and clinical trials involving human or animal subjects are properly subject to strict regulatory requirements governing the approval and observance of protocols. It is CAMRIS policy to obtain all necessary reviews, approvals, and – for human subject research or clinical trials – approved participant consent forms and faithfully comply with all approved protocols. If you have any questions regarding review and approval of or compliance with protocols, or any general questions regarding the rules and regulations applicable to research involving human or animal subjects, contact the CECO.

22. Scientific Misconduct

CAMRIS employees are expected to exercise the highest level of integrity in the conduct of science, extending to basic research, research in which animals are used, and clinical trials.

Integrity in research is not just the avoidance of wrongdoing but also the rigor, carefulness, and accountability that is expected in good research. This includes an emphasis on the quality of research, appropriate supervision, maintenance of accurate and detailed research procedures and results, and suitable assignment of credit and responsibility for research and publications, all of which are essential for fostering intellectual honesty and integrity in research.

CAMRIS research personnel are to refrain from all scientific misconduct. If allegations of scientific misconduct are made, CAMRIS will make an inquiry into and/or investigate the matter.

All CAMRIS employees are required to cooperate with any inquiry or investigation.

23. Conduct of International Business

CAMRIS employees conducting business internationally must comply with all applicable laws and regulations of the United States and the relevant foreign country or countries.

Compliance with such laws, as well as with CAMRIS policies (including this Code of Ethics), is required even if they seem inconsistent with local practice in foreign countries and even if they would place CAMRIS at a competitive disadvantage.

a. Employees are prohibited from making or offering unlawful payments or bribes.

The Foreign Corrupt Practices Act and other anti-corruption laws bar the payment or offering of anything of value to officials or politicians of foreign governments or any other person to obtain or retain business. Such laws also require proper accounting for transactions. CAMRIS employees are prohibited from making or offering to facilitate any payments to expedite or secure a routine governmental action.

b. Employees are required to comply with import and export control laws and regulations.

   U.S. laws and regulations control the import and export of goods, services, and technical information to other countries and to non-U.S. persons in the U.S., as well as the re-export of U.S. products from other countries. Many foreign countries have similar laws. CAMRIS employees are required to comply with these laws to the extent they apply to CAMRIS' activities.

c. Employees are required to obey U.S. economic boycott laws and regulations.

   U.S. laws and regulations restrict or prohibit trading with certain foreign countries and prohibit U.S. entities, such as CAMRIS, from complying with certain boycotts imposed by other countries. Anti-boycott regulations also require CAMRIS to notify the U.S. government of any boycott request received from a foreign government or official. Boycott laws, including the countries affected, change from time to time and must be closely monitored.

The application of U.S. and foreign laws and regulations is complex and changes frequently. Sometimes, U.S. law conflicts with foreign law. Whenever you have a question about U.S. or foreign laws or regulations, and if you ever perceive a conflict between U.S. and foreign law, contact the CECO for guidance.

24. Personal Conflicts of Interest or Commitment

CAMRIS has no desire to control the personal activities of its employees. Some employee activities, however, affect CAMRIS no matter when or where they occur. CAMRIS has a right to protect itself from employee conduct or relationships that might harm it or create an appearance of impropriety. This section discusses employee obligations, after hours, as well as on the job, in situations known as "conflicts of interest" and "conflicts of commitment."

a. A conflict of interest may arise in any situation that, based on the surrounding circumstances, could call into question an employee's impartiality. An employee is considered to have a conflict of interest whenever he or she, or any of his or her family, has an existing or potential financial or other material interest that either impairs or might appear to impair the employee's independence and objectivity in the discharge of responsibilities to CAMRIS. A close personal relationship that might cause an employee to choose between personal interests and interests of CAMRIS can also be a conflict of interest.

b. A conflict of commitment may arise when the external activities of a CAMRIS employee, such as secondary employment, teaching, or extensive volunteer service, do, or could, adversely impact, or appear to impact, his or her capacity to meet the expectations for his or her CAMRIS job responsibilities. A conflict of commitment may exist if external activities routinely occur during CAMRIS' normal business hours or impact an employee's ability to meet the position's requirements.

c. Employees must disclose all actual conflicts. Employees must also disclose any appearance of a conflict because the appearance of a conflict can affect outside perception of CAMRIS as much as an actual conflict of interest. When in doubt, whether a disclosable conflict exists, the employee is required to disclose.

d. An employee must disclose to their supervisor when there is an actual conflict or the appearance of a conflict. Supervisors receiving a disclosure are required to notify CAMRIS' CECO and propose a plan to address the conflict.

e. Personal relationships or financial interests with competitors, contracting parties, grant recipients, sub-awardees, subcontractors, suppliers, customers of CAMRIS, or others having CAMRIS Business Relationships, can create the appearance of a conflict of interest. To avoid the effect of any appearance of a conflict of interest, all family relationships and close personal relationships with and financial interests in competitors, contracting parties, grant recipients, sub-awardees, subcontractors, suppliers, customers of CAMRIS, and others having CAMRIS Business Relationships, must be disclosed.

f. All new employees will be required to review and acknowledge Personal and Organizational Conflicts of Interest Notice as part of initial in-processing. An employee must disclose on the Conflict Disclosure and Certification all interests and relationships that may conflict with the interests of CAMRIS, even if the employee does not believe that an actual conflict exists.

g. For purposes of the CAMRIS' Conflict of Interest & Commitment Policy, the following definitions apply:

- The term "Family Member" includes an employee's spouse, parent, dependent child, or stepchild and any relative by blood or marriage with whom the employee has similarly close personal ties.

- The term "Close Personal Relationship" includes an employee's fiancé, fiancée, significant other, domestic partner, or any other person with whom the employee has similarly close ties.

- The term "financial interest" includes ownership interests, investments (other than investments in publicly traded mutual funds), loans, wages, other compensation, and any direct or indirect financial interests that place a person in a position where there could be a conflict or the appearance of a conflict between his or her personal interests or affiliations and the interests of CAMRIS.

- The terms "competitor," "contracting party," "grant recipient," "sub-awardee," "subcontractor," "supplier," and "customer" include persons or entities who had previously or have currently any such arrangement with CAMRIS, or who are being considered by CAMRIS for any such arrangement in the future.

- The term "CAMRIS Business Relationships" includes past, current, or potential future competitors, contracting parties, sub-awardees, subcontractors, suppliers, vendors, customers, and the like.

h. CAMRIS and its employees must promptly eliminate any conflict or any appearances of a conflict. One or more of the following steps will usually produce an appropriate resolution: limitation of duties, transfer or reassignment, additional supervisory review, or any other action

considered appropriate by the supervisor and Legal Department.

i. When an employee discloses a personal relationship or other situation that might give rise to an actual or apparent conflict, an employee's supervisor, in consultation with the Ethics Department, will take appropriate action to remove any adverse effect to CAMRIS. Such action will typically include removing CAMRIS employees from business contact with the outside party. In some cases, the supervisor, with the express written approval of the CECO, may permit the employee to retain duties concerning the outside party, but in those cases the supervisor will monitor the situation closely to verify that the outside party receives no favoritism or special treatment from the CAMRIS employee.

j. Additional Rules for PHS and NSF Projects

All CAMRIS employees who are "Investigators"—employees who are responsible for the design, conduct, or reporting of research that is funded by the Public Health Service (PHS, which includes the National Institutes of Health, (NIH), or by the National Science Foundation (NSF) – are required to disclose all significant financial interests to CAMRIS. The significant financial interests to be disclosed are those that would reasonably appear to be affected by the research that is to be funded.

Employees who are Investigators or who submit grant applications to PHS or NSF are required to familiarize themselves with the applicable requirements.

Investigators are required either to certify that they have no significant financial interests or to disclose the significant financial interest before an application is submitted to the agency.

If in doubt as to the applicability of this requirement, the employee should consult the CECO.

25. Organizational Conflicts of Interest

Organizational conflicts of interest may arise when one CAMRIS business activity interferes or conflicts with another CAMRIS business activity. For example, work performed on one contract may make CAMRIS ineligible to compete for another contract if the nature of the first effort is perceived to provide CAMRIS with an unfair competitive advantage on the second effort.

CAMRIS is committed to complying with all applicable laws and regulations relating to avoidance or mitigation of organizational conflicts of interest. Accordingly, employees are prohibited from taking any action that creates or may appear to create an organizational conflict of interest unless authorized by an officer of CAMRIS.

26. Workplace Safety

CAMRIS is committed to providing a safe and secure workplace for its employees. In support of that objective, employees are expected to comply with all safety and security procedures applicable to CAMRIS and customer worksites.

27. Proper Use of Company and Customer Resources

CAMRIS provides certain equipment and other tools and resources for use by its employees in the performance of their job responsibilities. Employees are expected to comply with CAMRIS' policies

regarding the acceptable use of such resources. If employees are granted authorized use of government resources (e.g., if performing work at a customer site), such employees shall comply with the government's acceptable use policies.

C. VIOLATIONS OF THE CODE OF ETHICS

An employee who violates the Code of Ethics is subject to the full range of possible disciplinary actions, including employment termination. Some violations of the Code of Ethics are also crimes, punishable under federal or state law.

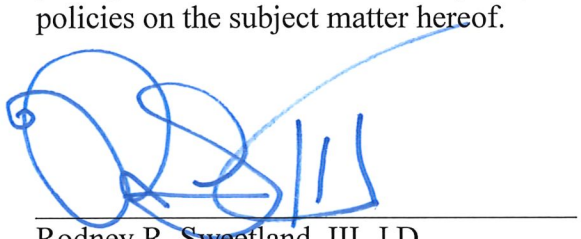
II. RELATED POLICIES

The Code of Ethics is the central CAMRIS ethics policy document. CAMRIS has other related policies and departmental procedures. If an employee has a question outside the scope of this Code of Ethics, then they should refer to and be mindful of any other applicable policies. As always, when in doubt, the employee should consult his or her supervisor, the Chief Ethics and Compliance Team, or the Ethics Hotline. For questions regarding the applicability and interpretation of laws, regulations, or CAMRIS policies or procedures, the employee may also consult the CECO.

This Code of Ethics does not create any right, privilege, entitlement, or cause of action in any person or entity (other than CAMRIS), whether governmental, commercial, private, or otherwise, where such right, privilege, entitlement, or cause of action would not otherwise exist.

EFFECTIVE DATE

This policy updates and memorializes existing policies, procedures, and practices already in place prior to its execution. This policy is signed August 24, 2026, and it supersedes all prior policies on the subject matter hereof.



Rodney R. Sweetland, III, J.D.
President