



# Corporate compliance policy

<b>Policy Number</b>	BPM-01
<b>Title</b>	Corporate Compliance Policy
<b>Implementation Date</b>	August 1996
<b>Updated</b>	November 2009, October 2010, January 2016, September 2017, March 2020, March 2022, June 2024

## Statement of Policy

Labcorp Holdings Inc. and its subsidiaries (together, "Labcorp") are committed to conducting business in compliance with all applicable laws, regulations, and Labcorp policies and according to the highest standards of ethical conduct and integrity. To help strengthen this commitment, Labcorp maintains an ongoing compliance program (the "Labcorp Business Practices Compliance Program") which is designed to prevent violations by Labcorp and its employees of applicable laws, regulations, and Labcorp policies, and is implemented and enforced with the purpose of detecting any such violations. The Labcorp Business Practices Compliance Program applies to all employees of Labcorp.

Labcorp shall designate a Chief Compliance Officer who reports to the Chief Legal Officer with dotted line reporting to the Chief Executive Officer. In addition, the General Counsel, the Corporate Compliance Department, and the Labcorp Compliance Committee shall assist the Chief Compliance Officer in connection with the implementation and administration of the Labcorp Business Practices Compliance Program. It is the responsibility of every employee and third party, if applicable, of Labcorp to adhere to this Policy.

## Chief Compliance Officer

The Chief Compliance Officer shall have oversight responsibility for the Labcorp Business Practices Compliance Program throughout Labcorp. In connection with these responsibilities, the Chief Compliance Officer shall be responsible for the matters set forth below:

1. Overseeing the implementation of procedures for employees to seek guidance on business conduct issues and for employees to report suspected violations of this Policy, overseeing the enforcement of this Policy to ensure that appropriate disciplinary measures are consistently applied, and coordinating appropriate action to prevent the recurrence of misconduct;

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2. Ensuring that the Labcorp Business Practices Compliance Program satisfies the guidelines set forth in the U.S. Federal Sentencing Guidelines for Organizational Defendants effective November 1, 1991, and all subsequent amendments thereto, and is aligned with the U.S. Department of Justice Evaluation of Corporate Compliance Programs guidance and the U.S. Department of Health and Human Services Office of Inspector General's General Compliance Program Guidance and related documents;
3. Ensuring that adequate training and education is being provided to all employees with respect to the legal requirements and related Labcorp policies that are relevant to their work including, as appropriate, laws and Labcorp policies related to health care fraud and abuse, kickback and false claims prohibitions, clinical laboratory regulation, food and drug, environmental, occupational safety and health, anti-corruption, anti-human trafficking, antitrust, insider trading, HIPAA, data privacy, and equal employment opportunity;
4. Providing for the dissemination to all employees of relevant written materials that explain in a practical manner what is required, including the following:
  - a. Business Practices Manual,
  - b. *Labcorp Code of Conduct and Ethics*, and
  - c. Related guidelines and materials;
5. Establishing and publicizing to all Labcorp employees and third parties (if applicable) a system for reporting suspected violations of this Policy, or other Labcorp policies and/or unlawful conduct, and establishing procedures to assure that the system is appropriately monitored and that all reports are documented, investigated, and appropriately acted upon. The system for reporting shall include a dedicated email address or website and toll-free telephone number ("Labcorp Action Line") for use by employees and others to report violations or suspected violations of the law or Labcorp policies;
6. Reporting periodically to the Chief Executive Officer, the Board of Directors, the Board's Quality and Compliance Committee, and the Executive Committee regarding the operation of the Labcorp Business Practices Compliance Program. The Chief Compliance Officer shall be responsible for presenting information or summaries to the Board of Directors and/or the Board's Quality and Compliance Committee on the following, among other things:
  - a. compliance-related activities and on-going compliance training programs;
  - b. compliance auditing and monitoring;
  - c. the results of internal compliance audits;
  - d. the status and results of audits, inspections, investigations, and enforcement actions by regulatory authorities;
  - e. any significant deviations observed; and
  - f. the status of any corrective and preventative action plans.; and
7. Reporting to the Board of Directors and/or the Board's Quality and Compliance Committee on any other compliance related matter as appropriate.

The Chief Compliance Officer may delegate his/her responsibilities to anyone within his/her organization or to any member of the Labcorp Compliance Committee, but nevertheless will retain overall responsibility for the maintenance and enforcement of the Labcorp Business Practices Compliance Program.

### **Corporate Compliance Department**

The Corporate Compliance Department shall manage activities of the Labcorp Business Practices Compliance Program, under the direction of and supporting the Chief Compliance Officer in performing his/her areas of responsibility.

The Corporate Compliance Department, under the direction of the Chief Compliance Officer, shall be responsible for the matters set forth below:

1. Supporting the initiatives of the Chief Compliance Officer and enhancing the Labcorp Business Practices Compliance Program;
2. Establishing, overseeing, monitoring, and maintaining the internal corporate compliance reporting process to ensure that employees can report concerns without fear of retaliation;
3. Ensuring reported concerns are promptly and thoroughly investigated;
4. Providing periodic summaries to the Chief Compliance Officer, as requested from time to time. The
5. Developing and deploying training and education programs including:
  - a. Annual Training regarding the *Labcorp Code of Conduct and Ethics*;
  - b. Annual Compliance Training;
  - c. Annual HIPAA Training;
  - d. Annual Privacy Training;
  - e. Periodic Global Compliance Training;
  - f. Annual Job-specific Compliance Training; and
  - g. Other periodic courses as may be required from time to time by the Corporate Compliance Department.
6. Providing support and consultation to employees on compliance related topics;
7. Developing and/or updating policies, as appropriate;
8. Managing the Labcorp Action Line for employees reporting issues or questions;
9. Investigating compliance inquiries reported to the Department through the Labcorp Action Line or otherwise;
10. Reporting any violation of law to the Chief Compliance Officer and, as appropriate, directly to the Chief Executive Officer;
11. Performing periodic audits to ensure ongoing compliance with Labcorp's compliance policies and reviewing audits from other areas, as appropriate;
12. Conducting or authorizing monthly exclusion and debarment checks;
13. Monitoring and auditing Labcorp systems for retention of Annual Compliance training and *Labcorp Code of Conduct and Ethics* acknowledgement records for compliance with the minimum 10-year record retention requirement; and
14. Such other duties as assigned from time to time by the Chief Compliance Officer.

The Corporate Compliance Department will appoint Compliance Liaisons in designated regional locations to serve as identifiable, direct connections for employees to the Corporate Compliance Department. The Compliance Liaison will participate in quarterly touchpoints with the Corporate Compliance Department, and perform assigned tasks as directed by the Corporate Compliance Department, and ad hoc activities to support Labcorp's Business Practices Compliance Program.

### **Compliance Committee**

The Compliance Committee, chaired by the Chief Compliance Officer, shall act as a resource to assist the Chief Compliance Officer in connection with the fulfillment of his/her duties. In addition to the Chief Compliance Officer, the Compliance Committee shall consist of the Chief Legal Officer, General Counsel, the Chief Medical Officer, and such representatives from corporate or business segment functions including Corporate Compliance, Internal Audit, Finance, Revenue Cycle Management, Human Resources, Information Technology, quality assurance, medical and scientific affairs, and commercial operations as may be designated from time to time by the Chief Compliance Officer. The Compliance Committee working with the Chief Compliance Officer shall be responsible for the matters set forth below:

1. Reviewing the Corporate Compliance Policy periodically to determine whether any changes or additions are necessary to maintain or enhance its effectiveness;
2. Reviewing the *Labcorp Code of Conduct and Ethics* periodically to determine whether any changes or additions are necessary to maintain or enhance its effectiveness and distributing updates, as necessary;
3. Periodically reviewing corporate policies and procedures that affect corporate compliance (such as the policies contained in the Business Practices Manual) to determine whether any changes or additions are needed to maintain or enhance their effectiveness;
4. Monitoring compliance auditing programs and assuring that any needed changes to policies or programs which are identified by the audits are implemented;
5. Providing assistance as requested in connection with the follow-up of reports received in connection with violations or potential violations including those received on the Labcorp Action Line, as appropriate;
6. Providing guidance and review of various employee training programs relating to the Labcorp Business Practices Compliance Program; and
7. Maintaining awareness of and providing assistance as needed to address specific and general compliance risks facing Labcorp.

#### **Responsibilities of Business Areas and Individuals**

Each business and functional area of Labcorp, and each of their employees and third parties, if applicable, shall exercise due diligence in attempting to prevent and detect unlawful conduct by employees and third parties or conduct in violation of Labcorp's policies. Consistent with their responsibilities, each business area shall establish and maintain appropriate procedures in addition to corporate procedures that are designed to maintain compliance with applicable laws, regulations, and Labcorp policies. Those procedures shall address the matters set forth below:

1. Identifying (through consultation with the Law and/or Corporate Compliance Department) applicable laws;
2. Establishing and maintaining policies and practices that help assure compliance with the Labcorp Business Practices Compliance Program to reduce the prospect of unlawful conduct or conduct in violation of Labcorp's policies;
3. Communicating the policies and practices to all employees and other third parties; and
4. Completing training as required under the Business Practices Compliance Program. Specifically, each newly hired employee must complete the following training within the first 30 days of employment:
  - a. Annual training regarding the *Labcorp Code of Conduct and Ethics*;
  - b. Annual Compliance Training;
  - c. Annual Privacy Training;
  - d. Annual Job-specific Compliance Training (if assigned); and
  - e. Annual HIPAA Training (if assigned).

#### **Reporting Alleged Misconduct**

1. Any employee of Labcorp who becomes aware of any issue or practice that involves a violation or potential violation of law or Labcorp policy must immediately report the matter. Any manager or supervisor who receives a report of violation or potential violation of law must report it immediately to the Chief Compliance Officer, the Chief Legal Officer or to the Corporate Compliance Department.

2. Each escalated report shall be promptly investigated, using the Law Department, the Corporate Compliance Department, Human Resources, outside counsel or other resources (such as representatives from the Compliance Committee), as the Chief Compliance Officer may deem appropriate.
3. If after investigation, the Chief Compliance Officer determines that further action (including disciplinary action or action to prevent similar future offenses), is warranted he/she shall report the findings to the appropriate managerial personnel.
4. If, in the opinion of the Chief Compliance Officer, a violation of the law has occurred, he/she shall so advise the Chief Legal Officer or Chief Executive Officer, shall determine whether the violation should be disclosed to the appropriate authorities, and shall promptly make, or cause to be made, any required or appropriate disclosure. In any event, if an unlawful offense is detected, the relevant business/functional area must take all reasonable steps to respond appropriately to the offense and to prevent the recurrence of the offense or any similar offenses.
5. Any reported or suspected fraud, waste and abuse as related to a Medicare Advantage Plan shall be reported to the Medicare Advantage Plan Sponsor in accordance with the applicable contract terms and federal law. Such reports shall be managed in consultation with the Law Department.
6. It is a violation of this Policy for any employee to retaliate in any way against any person for reporting in good faith any suspected violation or potential violation of law or Labcorp policy.

### **Enforcement of Policy**

Any violation of this Corporate Compliance Policy shall be consistently enforced by managers and supervisors as a disciplinary offense. Violations include not only a failure to comply with applicable laws and regulations and Labcorp policies, but also a failure to detect, report, and/or correct any offense. Violations of this policy and/or any law or other Labcorp policy and procedure related to compliance will result in disciplinary action, up to and including termination of employment.

### **Monitoring and Auditing**

The Chief Compliance Officer shall be responsible for ensuring the maintenance by Labcorp of appropriate monitoring and auditing systems that are reasonably designed to assure that the activities of Labcorp comply with all applicable laws, regulations, and Labcorp policies. To this end, the Corporate Compliance Department, the Internal Audit Department, the Corporate EHS Department, and the segment quality functions shall be responsible for appropriate periodic audits.

### **Other Policies and Practices**

This Corporate Compliance Policy is intended to establish a procedural framework for compliance by Labcorp. It is not intended to set forth fully all of the substantive programs and practices of Labcorp that are designed to help achieve compliance. Additional compliance standards are established and maintained through many practices, procedures, and policies established by each business/functional area, which are an integral part of the overall compliance efforts of Labcorp. Labcorp maintains various compliance practices and policies in addition to this Corporate Compliance Policy and which continue to be a part of the overall compliance efforts of Labcorp.

### **Corporate Compliance Department Review, Approval, And Assistance**

Any exception, change or deviation from this Policy must be reviewed and approved by the Corporate Compliance Department. The Corporate Compliance Department and the Law Department will be available to answer any questions and to provide assistance and advice to employees concerning this Policy. Questions regarding specific terms, situations, or problems may be forwarded to the Corporate Compliance Department or the Law Department for assistance and advice.

APPROVED BY COMPLIANCE COMMITTEE: June 17, 2024 Meeting Minutes