



Action With Integrity

Code of Ethics

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CEO Message



I am pleased to present the Quest Diagnostics Code of Ethics. The Code is an important part of our commitment to Integrity, empowering us with the tools and information we need to improve health outcomes and earn and maintain the trust of our patients, customers, shareholders and colleagues. Our Code is not merely a set of rules: It sets out the principles we should follow to make good decisions no matter where we work or what job we do.

We are proud to be industry leaders in ethics and integrity. Acting with integrity and living our Values is critical to our success and inspires trust on the part of those we serve. It creates a sense of pride among all of us.

What should we expect of each other? Nothing less than our very best. In every interaction, ask yourself: Am I doing what's right for patients? Am I promoting integrity in my business relationships? Am I being fair?

If something isn't right, take action. If you observe a violation of our Code, speak up. If something isn't clear to you, ask for guidance.

Compliance with the Code is an expression of the commitment we share in achieving our vision of empowering better health with diagnostic insights. Taking Action With Integrity brings us closer to achieving that vision.

Thank you for your commitment.

Jim Davis
Chairman, CEO and President



Our Values

QUALITY

The patient comes first in everything we do. Our passion is to provide every patient and every customer with services and products of uncompromising quality – error free, on time, every time. We do that by dedicating ourselves to the relentless pursuit of excellence in the services we provide.

INTEGRITY

Credibility is the key to our success. All of our processes, decisions and actions ultimately are driven by integrity. We are honest and forthright in all our dealings with our customers and with each other. We are responsible corporate citizens in the communities we serve. We fully comply with the laws and regulations governing our business, not only as a legal obligation and as a competitive necessity, but because it is the right thing to do.

INNOVATION

We constantly seek innovative ways to enhance patient care and provide value to our customers. We support the creativity, courage and persistence that transform information into knowledge, and knowledge into insights. We seek continuous advancement through the adaptation of existing knowledge, as well as through experimentation, with the full understanding that we learn from our failures as well as our successes.

ACCOUNTABILITY

As a company and as individuals, we accept full responsibility for our performance and acknowledge our accountability for the ultimate outcome of all that we do. We strive for continuous improvement, believing that competence, reliability and rigorous adherence to process discipline are the keys to excellence.

COLLABORATION

We believe in teamwork and the limitless possibilities of collaborative energy. We achieve excellence by putting collective goals ahead of personal interests. We support and encourage open communication and meaningful cooperation among colleagues from varying backgrounds and disciplines. We respect individual differences, and we value diversity.

LEADERSHIP

We strive to be the best at what we do – both as a company, and as individuals. We embrace the qualities of personal leadership – courage, competence, confidence and a passion for surpassing expectations. We will provide growth opportunities for our employees, quality services and products to our customers and superior returns to our shareholders.



How to Use Our Code

Our Code is our resource for doing the right things the right way.

Our Code is provided to help you make good decisions. Read it, understand it and use it. Act on its principles and encourage your colleagues to do the same. Remember, when it comes to acting ethically and with integrity, the smallest decision or action can have a huge impact on your team, your department, your region or function, and our entire Company.

Our Code provides you with an outline of our key policies and principles and tells you where to go and who to ask to get more detailed answers. No Code can cover every possible situation. For many of the topics in the Code, we have more detailed policies and procedures, many of which are referenced in the Code with hyperlinks.

If you encounter a situation that is not covered in our Code, or have a question or concern about any of the subjects covered in the Code, speak up. Ask your manager or supervisor. If you are uncomfortable speaking directly with him or her, use one of the other options and resources listed in the [Who to Contact](#) section of our Code. Remember, you have a responsibility to report any inappropriate behavior or suspected violation of our Code, our policies, our procedures or the law.

WHAT IS “ETHICS”?

Ethics means the moral principles that govern a person’s or group’s behavior. Ethics is doing the right thing because it is the right thing to do.

WHO DOES THE CODE APPLY TO?

Our Code and Compliance policies apply to all of us, employees, directors, executives as well as our vendors, contractors, suppliers, interns, business partners and representatives who work on our behalf.

WHAT SHOULD I DO?

I am trying to do the right thing, but the Code isn’t specific or detailed enough on the issue I am wrestling with. What should I do?

Raise the issue. Talk to your manager or supervisor, or use the other resources listed in the [Who to Contact](#) section of our Code.





1 Commitment to **LEADERSHIP**

We strive to be the best at what we do – both as a company, and as individuals. We embrace the qualities of personal leadership – courage, competence, confidence and a passion for surpassing expectations. We will provide growth opportunities for our employees, quality services and products to our customers and superior returns to our shareholders.

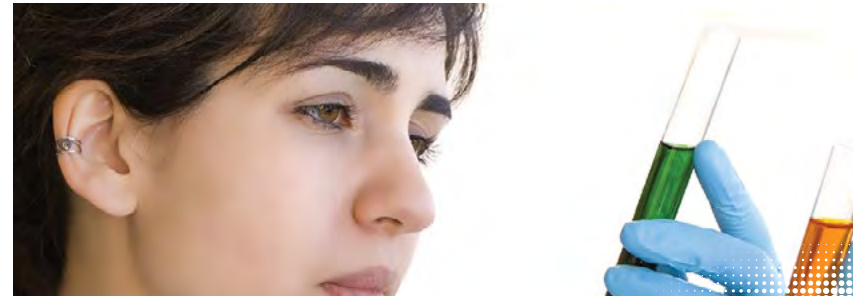
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Leading the Industry in Ethics and Integrity

As the world's leading provider of diagnostic testing, information and services, we have a responsibility to act with the highest ethical standards.

We are proud to be industry leaders in ethics and integrity. Integrity is one of our Values, and reflects who we are as a company and as individuals. Acting with integrity and living our Values is critical to our success and inspires trust on the part of our patients, our customers and our shareholders. It creates a sense of pride among all of us. It is crucial to achieving our goals of a healthier world, building value and creating an inspiring workplace.

Our commitment to ethics and integrity includes the concept of fair dealing. This means that we treat each other and our business colleagues with fairness and respect. You must deal fairly with other employees, customers, patients, vendors and competitors. None of us may take unfair advantage of anyone through manipulation, concealment, abuse of privileged or confidential information, misrepresentation of facts or any other unfair practice.



To protect Quest Diagnostics' position as a leader in ethics and integrity, you have a responsibility to:

ACT WITH INTEGRITY. Observe high standards in every business transaction and in every business relationship. Honor the privacy of all health and personal information.

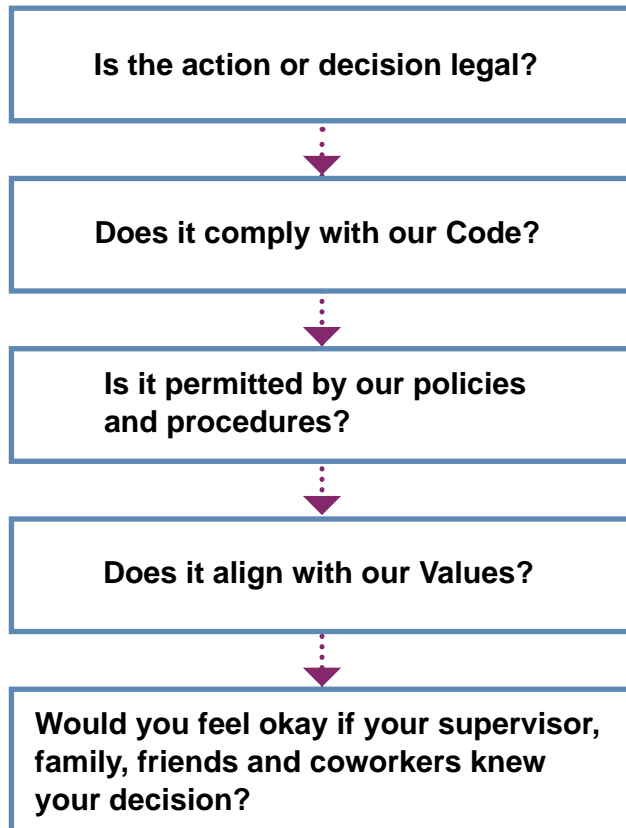
KNOW THE STANDARDS AND LIVE BY THEM. You are expected to be familiar with the Code and the laws and policies that apply to your role. Read and comply with the Code, and always follow applicable laws and regulations.

ASK QUESTIONS. If a policy, standard or principle is unclear, or you are not sure of the right thing to do, ask before you act.

SPEAK UP. If you spot a violation of the Code, a policy, a law or regulation, don't ignore it – [report your concerns](#) immediately. Management is committed to making sure that we uphold our standards and that any concerns are addressed.

MAKE GOOD DECISIONS

For most routine on-the-job decisions, you can reference this Code, relevant policies or SOPs, and trust your judgment. When making tougher decisions about the right thing to do in a difficult situation, see if you can truthfully say “yes” to each of these questions. If so, your decision is probably the right one. If you are ever in doubt about the right thing to do, ask before you act:



Leading With Integrity as a Supervisor

We expect our leaders to set the right tone and lead by example.



Managers and supervisors have additional responsibilities, and play a critical role in promoting our Code, leading with ethics and integrity and creating an inspiring workplace.

As a supervisor, you have a responsibility to:

ACT AS A MODEL. Make ethical decisions and demonstrate – through your words and your actions – your commitment to integrity. Remember that your employees are watching how you act.

DO THE RIGHT THING. The decisions and situations that reach management level are, at times, not easy ones, and making the right decision may not be the most popular thing to do, but you are accountable for maintaining our Company’s integrity.

USE THE CODE. Make the Code come alive in your daily work. Visibly use and support the Code in your interactions with your team. Refer to it often to answer questions. Encourage your employees to do the same.

HAVE AN OPEN DOOR. Create an environment where all employees are encouraged to raise concerns and propose ideas. When an employee raises a concern, listen and address the concern promptly. If the concern involves a violation of the Code, [report it](#).

PREVENT RETALIATION. Never retaliate against an employee for bringing forward a concern in good faith and don’t allow retaliation by others. Be aware that either real or perceived retaliation can prevent employees from speaking up.

MAKE SURE YOUR TEAM GETS THE TRAINING THEY NEED. Ensure your employees receive the training and education they need to properly perform their job duties, including training on this Code and Compliance training. Follow up to ensure what they learned is implemented in their job duties.

BE PRESENT. Your direct reports rely on you for guidance and support. Always be available to them whether in person or via phone. Your relationship with your direct reports is the cornerstone of solid management in a high-performing company.

WHAT SHOULD I DO?

A member of my team told me that in order to meet a deadline on an important project, she signed my name on an approval form because I was tied up in meetings. She said the approval was just a formality and it was probably no big deal, but she felt she should let me know. As her supervisor, what would be the best course of action?

Forging a signature is serious. It’s best to address the problem with your employee and be transparent with others about what happened. Keeping silent sends a message to your employee and your team that skipping a requirement is okay, and it’s not – even if it seems like just a formality. As a supervisor, you have a responsibility to model ethical behavior and do the right thing. Report the incident to the HR Service Center.

An employee came to me to discuss a disparaging comment regarding racial discrimination that she overheard from a member of our department. This is not the first time I picked up on the employee’s discrimination, and since she confided in me as a leader, I need to address her concern. I don’t know that I’m equipped to approach the employee directly, so is it ok to report this to the CHEQline, or should I call my HR team?

Although the CHEQline is always an option for reporting concerns, when someone comes to you directly, you have a responsibility to listen, thank the employee for having the courage to come forward, and promptly take the appropriate action. In this case, there might be more direct resolution if you speak directly with your HR support.



Duty to Report

It is your duty to report if you have knowledge or a good faith belief that this Code, a law, Company policy or ethical guideline has been, is being, or may be violated.



Preventing ethical violations can be as easy as taking a coworker aside and saying that something is “not okay.” However, if you know or suspect someone – including an employee, member of management, supplier, business partner or other third party – is violating our Code, our policies, applicable laws or regulations, you have a [Duty to Report](#) it.

You have many avenues to raise concerns, including your manager, any member of Human Resources (HR) or the [HR Service Center](#), or any member of the

[Compliance](#) or [Legal](#) Departments. You are encouraged to identify yourself when you file a report and provide as much information as possible to facilitate an effective investigation. Employees in the United States and most other locations can also raise concerns anonymously or confidentially through our CHEQline, which is available 24 hours a day, 7 days a week, and is operated by an independent third-party organization. The Company will maintain the reporter's identity for all compliance related reports to CHEQline unless the matter is turned over to law enforcement or disclosure is required during a legal proceeding.

I Want To ...	Who should I call?	Contact Info
Make a suggestion or get a question answered by senior management with subject matter expertise	- Employee Response Line	PH: 1.800.513.6287 Email: ERL@questdiagnostics.com
Ask an employment-related question or concern	- HR Service Center	PH: 1.855.411.8511
Report a potential or suspected violation of our Code, a Company policy, a regulation or the law	- Your supervisor or manager - Another member of management - Your Compliance director - The Compliance Department - The Legal Department - HR or the HR Service Center - The CHEQline	See Who to Contact for contact information PH: 1.800.650.9502 Website: MyComplianceReport.com Use access ID: QDI

WHAT SHOULD I DO?

What if I report conduct that I think violates our Code but I am wrong?

Q&
A

If you make the report in good faith, which means you are acting on what you honestly believe to be true and reporting the facts as you know them, you will not be subject to disciplinary action.

I overheard my co-workers discussing the test results of another employee who has called out for a few days. I understand it's my responsibility to report it, but I don't want to get anyone in trouble.

Q&
A

It is your responsibility to speak up about any suspected violations of our Code or policies. [Report it](#) to your manager or supervisor or to the other resources listed in this section who will report it to Compliance. In this case, your co-workers have an obligation to respect the privacy of the employee, and this needs to be addressed.

Violations of the Code

Compliance with our Code is a critical part of working for Quest, and we take violations – of the law, our Code or our policies – seriously. We proactively investigate reports of misconduct and take corrective action, which may include discipline up to and including termination, depending on the seriousness of the violation.

Non-Retaliation

We do not tolerate retaliation against anyone for speaking up in good faith about misconduct, including a violation of this Code or policy. Retaliation may be direct or indirect, and take many forms including dismissal, demotion, threats, harassment or discrimination. If you feel you or someone else has been the victim of retaliation, [report it](#).





2 Commitment to **INTEGRITY**

Credibility is the key to our success. All of our processes, decisions and actions ultimately are driven by integrity. We are honest and forthright in all our dealings with our customers and with each other. We are responsible corporate citizens in the communities we serve. We comply with the laws and regulations governing our business, not only as a legal obligation and as a competitive necessity, but because it is the right thing to do.

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Obeying the Law

Quest Diagnostics is committed to compliance with all laws and regulations that govern our business operations.

You have a responsibility to understand and follow the federal, state and local laws that apply to your job and the location in which you work. This includes laws that pertain to clinical laboratories that seek reimbursement from the Medicare and Medicaid programs and laws that pertain to relationships between our Company and referral sources such as physicians, hospitals and nursing homes.

If U.S. laws conflict with the requirements in the country or countries where you work, always observe the more restrictive requirement. If you are unsure about a law or legal obligation, consult the [Compliance](#) or [Legal](#) Departments.

BECAUSE WE ARE BASED IN THE UNITED STATES ...

There are various laws that apply to our business including:

- The Anti-Kickback Statute
- The Stark Law
- The False Claims Act
- The Food, Drug and Cosmetics Act
- The Civil Monetary Penalties Statute
- Clinical Laboratory Improvement Amendments (CLIA)
- HIPAA Privacy and Security Regulations
- State False Claims Acts

Interactions With Healthcare Providers

We interact ethically with healthcare providers.

All of our engagements with healthcare providers are transparent and appropriate. We believe in building relationships with our customers by providing industry-leading quality, innovation and service, not by offering bribes or other improper inducements. We do not engage in any conduct that is intended to, or has the appearance of, improperly influencing a healthcare provider's judgment.

We follow all federal and state laws that govern our relationships with healthcare providers, including the Anti-Kickback Statute and the Stark Law. These laws can be complicated and very strict. For example, the Stark regulations impose detailed requirements governing how we may enter into and manage contracts with physicians, and may prohibit various payments to physicians even if the payments are not made with an impermissible purpose.

Always be careful in any situation where we are providing, buying or selling anything other than diagnostic information services to or from an actual or potential customer. Review the applicable Compliance policies and contact the [Compliance](#) or [Legal](#) Departments for guidance if you have any questions.

WHO IS A HEALTHCARE PROVIDER?

For purposes of this Code, a healthcare provider includes:

- Any person (including a physician), hospital, group practice or other entity that is authorized to order testing or employs anyone authorized to order testing.
- A client, potential client or any other person who is in a position to influence the purchase or referral of our Company’s products or services.
- The immediate family members of anyone noted above.

As used in this Code, “healthcare provider” does not include any employee of our Company.



WHAT SHOULD I DO?

What if a client at a large physician practice calls and requests the testing be written off for her nephew who just started a new job and has a large deductible?

Don’t do it. This would be considered a “professional courtesy” and honoring the request would violate our policy. This could also violate our agreements with health plans.

I have been placed in a client’s office as an in-office phlebotomist. Often, when I don’t have any patients to draw, the client’s staff uses the Quest phlebotomy chair to give injections, takes my supplies, and disposes the needles in my bio-waste container. Is this permitted?

No. Quest supplies, equipment, and services should be used for Quest testing only. You should report this to your supervisor or Compliance Director so they can re-educate the client, and put measures in place to secure our supplies and equipment. If you are ever unsure, consult the Phlebotomy and Other Healthcare Services and Supplies, Equipment and Services Policies or ask before you act. If you are ever unsure, consult the [Phlebotomy and Other Healthcare Services Policy](#) and ask before you act.

I work as an IOP in the office of a large client and have noticed that the client is using Quest Diagnostics tubes to collect specimens for testing in its own laboratory. What should I do? [Report it.](#)

Although our [Supplies, Equipment and Services Policy](#) allows us to provide certain supplies exclusively for use in collecting specimens to be sent to Quest for testing, clients may not use those supplies for any other purpose.



Gifts, Meals and Entertainment

Federal and state laws and our policies limit what we may give our customers in the way of gifts, entertainment, promotional items and other hospitalities and courtesies. Make sure you know and comply with our policies.

Our [Gifts, Entertainment and Promotional Items Policy](#) prohibits giving gifts to our customers, or potential customers, in the United States. Modest business meals and entertainment are permissible if:

- We are promoting Quest services.
- A Quest representative attends the meal or entertainment with the customer.
- The cost and frequency are moderate.
- New or continued business is not an implicit or explicit condition of the meal or entertainment.
- The meal or entertainment does not violate any local, state or federal law, rule or regulation.
- The value of the entertainment would not exceed the annual dollar limits provided in our Policy.

A CLOSER LOOK

[Gifts, Entertainment and Promotional Items Policy](#)
[Charitable Contributions Policy](#)

WHAT SHOULD I DO?

I met two of my physician clients at a dinner meeting to discuss new testing that Quest is rolling out which will help in the diagnosis of their patient population. I forgot to check the Stark Report, and I might have exceeded the annual spending limit. Now what?

Q&
A

You must immediately report this to your manager and Compliance Director. It's always best to be up front and honest about potential issues or mistakes. The Compliance Department will work with you to best resolve the issue.

A tax-free charitable foundation formed by a local hospital is having a fund drive for a new clinic to serve poor families in the community. Can my local Quest laboratory make a donation?

Q&
A

Maybe. Quest Diagnostics makes charitable contributions to charities that are aligned with our Values and Vision. If a charity is a customer or potential customer, follow the special requirements in the [Charitable Contributions Policy](#). If you have any questions, consult our Charitable Contributions Policy or contact your Compliance Director.

Interactions With Government and Government Officials

As good corporate citizens, we are honest and forthright in all dealings with government authorities, and we cooperate with government inspections, investigations and inquiries.

Responding to Inquiries and Requests for Information

To make sure we respond appropriately, promptly contact the [Compliance](#) or [Legal](#) Departments for assistance if you receive an inquiry or request from a government official or agency. Do not provide information until you have obtained permission to do so. Certain routine inspections may be handled without the involvement of the [Compliance](#) or [Legal](#) Departments.

If you are questioned as part of an investigation or audit:

- Provide truthful, accurate and complete information.
- Never impede, obstruct or improperly influence an audit or investigation.
- Never lie or make false or misleading statements – whether in writing or verbally.
- Never attempt to persuade someone else to provide false or misleading information.
- Never destroy or alter documents or records following, or in anticipation of, a request to turn them over to the government or a government official.

A CLOSER LOOK

[Cooperation with Government Inspections and Inquiries Policy](#)

Political Contributions and Political Activity

The Quest Diagnostics Political Action Committee, QuestPAC, is authorized to make political contributions to federal and state candidates with prior approval of the QuestPAC Board of Trustees. Other than through QuestPAC, Quest Diagnostics funds may not be used for political contributions.

Certain employees may need pre-clearance from our Government Affairs Department before making political donations in some jurisdictions. Otherwise, you are free to participate in the political process and make political contributions – just make sure you do not use Quest’s name, resources or time to support your personal political activities. For additional information, contact our [Government Affairs Department](#).

A CLOSER LOOK

[Political Contributions Policy](#)

Bribery and Anti-corruption

We do not tolerate bribery in any form. You may never pay, promise to pay, agree to accept or accept anything of value, either directly or indirectly, in exchange for obtaining or retaining business or to gain an improper advantage. This prohibition also applies to facilitation payments. Always follow our procedures for screening suppliers working for us outside the United States (“business intermediaries”).

There are various laws that govern our interactions with governments and government officials, including the United States Foreign Corrupt Practices Act, the Criminal Law Convention on Corruption from the Council of Europe, and anti-bribery and anti-corruption laws of the countries in which we do business.

Be aware that healthcare providers who work in, on behalf of, or are affiliated with a government healthcare facility, institution, university or hospital are also considered government officials. Ensure that your conduct with them, as in any of your business relationships, is honest, transparent and legal. Always follow our standards on [Interactions with Healthcare Providers](#).

A CLOSER LOOK

[\(FCPA\)/Anti-Corruption Policy](#)

WHAT SHOULD I DO?

I manage a business outside the United States. We are having trouble obtaining a local permit that we need to open a patient service center. A local contractor tells me that if I pay him a “consulting fee,” he can obtain the permit. Can I hire him?

No. We may not make improper payments directly or through others, and we have various procedures in place to help make sure our representatives are acting lawfully. Consult the [FCPA Policy](#) or call the [Legal](#) Department for guidance.

Q&
A



Import and Export Controls

The laws that apply when we send something to another country or receive something from another country are complex. They may apply even when we are not physically sending something to, or receiving something from, another country. In particular, U.S. export control laws may restrict the transfer of technical information to foreign nationals even when the transfer takes place wholly within the United States. We must also comply with anti-boycott laws, which in general prohibit us from refusing to do business with another country.

If your job involves sending anything to, or receiving anything from, another country, make sure you:

- Do not transact business with countries that are subject to United States trade embargoes or economic sanctions.
- Contact the [Legal](#) Department if you receive a request for the Company to engage in or support a boycott.
- Ask questions anytime you're unsure of the proper course of action.

A CLOSER LOOK

[Import Controls Policy](#)

[Export Controls and Trade Sanctions Policy](#)

Interactions With Our Competitors

We believe that society benefits from fair, free and open markets. We interact fairly and honestly with our competitors.

Fair Competition

Quest Diagnostics competes vigorously and fairly by providing industry-leading quality, innovation and service. We comply with all antitrust and fair competition laws. Although these laws are complex, they generally prohibit agreements between competitors to fix prices, allocate markets or otherwise restrain trade.

Do not participate in any plan, discussion, understanding or agreement with a competitor or supplier that could appear to interfere with free competition, including discussing pricing or allocating markets or territories. Doing so could violate the law and lead to serious penalties. If you have questions about what is permissible to discuss with competitors, contact our [Compliance](#) or [Legal](#) Departments.

A CLOSER LOOK

[Antitrust Policy](#)

WHAT SHOULD I DO?

During a break at a recent medical meeting, a competitor tried to engage me in a conversation about pricing. Is that an off-limits topic?

Q&
A

Yes. In any situation where you are interacting with a competitor and the conversation turns to pricing or price-related topics, let the competitor know that you will not engage in the discussion. Then, excuse yourself and immediately report the incident to the [Legal](#) Department.



Competitive Intelligence

Gathering information about our competitors and their products in an ethical and lawful way is a legitimate business activity. We gather and use competitive information legally, and never acquire information about our competitors through improper means such as theft, deception or misrepresentation.

Activities such as obtaining information from publicly available sources, attending open meetings or seminars, or passing on non-confidential information provided by customers are acceptable.

You should never:

- Solicit, obtain, use or disclose a competitor's information if you know, or have reason to know, that it is confidential. You should assume that if Quest considers the information confidential, our competitors do as well.
- Ask any former employee of a competitor to reveal confidential information.
- Misrepresent yourself to obtain information or lie about who you work for.

If you have any questions about gathering competitor information, check our guidelines or contact our [Legal](#) Department.

A CLOSER LOOK

[Competitive Intelligence Guidelines](#)



3

Commitment to **QUALITY AND INNOVATION**

The patient comes first in everything we do. Our passion is to provide every patient and every customer with services and products of uncompromising quality – error free, on time, every time. We do that by dedicating ourselves to the relentless pursuit of excellence in the services we provide.

We constantly seek innovative ways to enhance patient care and provide value to our customers. We support

the creativity, courage and persistence that transform information into knowledge, and knowledge into insights. We seek continuous advancement through the adaptation of existing knowledge, as well as through experimentation, with the full understanding that we learn from our failures as well as our successes.

Quality of Our Products and Services 21

Quality of Our Products and Services

Our diagnostic insights inspire actions that transform lives. When our customers use a Quest Diagnostics product or service, they put their trust in its consistent and uncompromising quality. This absolute standard of excellence is instrumental in achieving our objective of creating a healthier world.



Customer trust and satisfaction is the foundation of everything we do. We earn this trust by our commitment to developing and setting the standard for quality processes which will provide customers and patients with a superior experience and diagnostic information services that inspire action. We meet every challenge and opportunity with methodical precision every time, using proven, powerful tools and strategies. We rely on our expertise and training to improve performance consistently and continuously.

The Quest Diagnostics Quality System Framework provides the basis of our Quality Management System. The Quality Management System includes policies and procedures to document, measure and monitor the effectiveness of laboratory operations in improving quality and meeting regulatory requirements of agencies governing the laboratory industry.

To make sure we maintain the highest quality:

- Live the principles of Everyday Excellence.
- Always follow our SOPs and other guidelines. If you think an approved procedure doesn't work well, raise the issue with your supervisor. Don't take it on yourself to modify the way things are done without changing the procedure.
- Understand and follow the CLIA requirements relevant to your job. Those requirements include:
 - Performing tests only with written authorization of a physician or other individual authorized under state law to order laboratory testing.
 - Releasing test results only to an authorized person.
 - Obtaining the necessary CLIA certificates before performing a test.
 - Insuring adherence to CLIA requirements when participating in proficiency testing surveys.
- **SPEAK UP** – if you see a violation of procedures or anything else that makes you uncomfortable, raise it to your supervisor, manager or Laboratory Director. Remember, the [Duty to Report](#) applies to quality.



4

Commitment to **COLLABORATION**

We believe in teamwork and the limitless possibilities of collaborative energy. We achieve excellence by putting collective goals ahead of personal interests. We support and encourage open communication and meaningful cooperation among colleagues from varying backgrounds and disciplines. We respect individual differences, and we value diversity.

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Interactions With Our Colleagues

We celebrate our differences and respect the unique skills and experiences of our fellow employees.

Embrace the diversity of our workforce and be open to the ideas and contributions of others. This helps build a stronger company that is better prepared to meet customers' needs in an expanding global marketplace, and is crucial to achieving our vision of empowering better health with diagnostic insights.

Equal Employment Opportunity

Quest Diagnostics is an equal employment opportunity employer. We prohibit unlawful discrimination in our employment practices. We recruit, hire, train, pay and promote qualified individuals without regard to race, color, religion, sex, age, national origin, disability, veteran status, sexual orientation, gender identity or any other status protected by federal, state or local law. We make employment decisions based on each individual's qualifications, experience and suitability for the role. For more information, see our [Equal Employment Opportunity Policy](#).

Harassment

We prohibit any conduct, whether verbal or physical, that is abusive or offensive or that involves harassment, intimidation or bullying. In particular, we do not tolerate any such behavior that is related to a person's race, color,

sex, age, religion, national origin, disability, veteran's status or sexual orientation or any other status protected by federal, state or local law. Sexual harassment includes sexually suggestive objects or images, jokes or comments, degrading words, or unwanted touching or propositions. For additional information, review our Harassment Policy.

Global Inclusion

The richness of our diversity makes Quest stronger, more innovative and a better performing company across all dimensions. Inclusion creates an inspiring culture and enables Quest to better understand and be relevant to our clients. It also allows us to create unique opportunities in the marketplace.

Our Employee Business Networks (EBN) are a key part of this effort. We encourage employees to join an existing EBN or start a new one whose mission is aligned with Quest's goals. If you have an idea for an Employee Business Network, email DiversityInclusion@QuestDiagnostics.com

WHAT SHOULD I DO?

My co-worker is initiating unwelcomed physical contact that is making it difficult for me to perform my job because I'm always on edge. I'm not sure if this is considered sexual harassment. How do I handle this situation?

Tell the person to stop, if you feel comfortable doing so, and immediately report the conduct to your supervisor, manager, the director of your department or operational group, the [HR Service Center](#), [CHEQline](#), or online at [MyComplianceReport.com](#).



External Communications

We ensure that communications about our business are consistent, accurate and balanced.



In order to make sure that correct and complete business information is conveyed to the public, regulatory authorities, investors and others, we have designated individuals to serve as our official Company spokespersons. Unless you are authorized to do so, do not make any statements on behalf of Quest Diagnostics.

If you receive a request or inquiry:

- Refer all inquiries from newspapers, magazines or other external media sources to [Corporate Communications](#).
- Refer all requests from government agencies and officials to the [Legal](#) Department.
- Refer all requests from analysts, brokers, investment advisors and other members of the investment community to Investor Relations.

WHAT SHOULD I DO?

An online business website requested my opinion on a healthcare issue. Can I give them a statement that reflects our Company's position?

No. You must direct this inquiry, and any other inquiries from the media, to [Corporate Communications](#).



Social Media

Social media gives us the opportunity to share knowledge, information and opinions with the broader community. However, it also carries risks. Be careful what you share and use good judgment in what you publish online. This includes social networks as well as your own website, blog or page. Our [Social Media Policy](#) applies to all Quest Diagnostics employees, contractors and consultants.

When using social media:

- Make it clear that your opinions, comments and other posts are yours and are not representative of our Company.
- Use your personal email address rather than your Company email address in any of your posts, unless you are approved to use social media internally on our behalf.
- Do not post anything that violates our policies or laws pertaining to discrimination, harassment, bullying, abuse, retaliation, or health and safety.
- Do not post Protected Health Information (PHI) or Personally Identifiable Information (PII) of our patients or employees.
- Correct mistakes if you do post inaccurate information about our Company.
- Never post Company logos or trademarks for commercial use unless authorized by the Company to do so.
- Never post confidential, proprietary or material nonpublic information about Quest Diagnostics, our customers, patients, vendors or business partners.
- If you see content online about Quest that you believe is inaccurate, contact [Corporate Communications](#) with a brief note and a link to the online content. Send your questions about social media to: SocialMedia@QuestDiagnostics.com.

WHAT SHOULD I DO?

On my blog I mentioned that I work for Quest Diagnostics. I never reveal confidential information or use Company logos. Is this acceptable?

Q&
A

Yes. If you do not express your opinions about the Company, and are careful not to reveal confidential or proprietary information about our business or the businesses of our vendors, customers or business partners.

A coworker recently mentioned our Company in a comment she made on a social network. I found the comment offensive, but I'm not sure it violates our Code. Should I alert someone?

Q&
A

Yes. When you are unsure whether a social media post is in compliance with our policies, discuss it with a manager or supervisor or request advice from: SocialMedia@QuestDiagnostics.com.

Is it okay for me to share social media content from the Company?

Q&
A

Yes. Quest regularly publishes original content and shares business-related content from other sources. Sharing our content among personal networks can increase our awareness and visibility. Please note, no employee can be compelled to do so.

Environment, Health and Safety

Maintaining a safe and healthy workplace is everyone's responsibility.

Wherever you work, comply with our Environment, Health and Safety policies and procedures, as well as all applicable laws and regulations.

- **TAKE AN ACTIVE ROLE** in promoting your own safety. Observe safe work practices, obey posted warning signs and wear personal protective equipment whenever it's required. Follow all applicable regulations and procedures when disposing of waste in order to protect the environment we all share.
- **IMMEDIATELY REPORT** to your supervisor any workplace injury or activity or condition that could pose a threat to your personal safety or put anyone at our workplace at risk of injury or accident. If an incident requires medical attention or the assistance of law enforcement, seek help immediately. Report any environmental non-compliance, or other concern or condition that may cause ecological harm.
- **BE AWARE** that our Company is drug-free, alcohol-free and weapon-free, and that Workers Compensation fraud is a crime that affects all employees. Report any known or suspected violations of these policies.

A CLOSER LOOK

[Environment, Health and Safety Home Page](#)

WHAT SHOULD I DO?

I noticed a potential safety hazard in another area. I don't want to get involved, and it may not be a big deal anyway. Do I have to report it?

We are all responsible for promoting a safe workplace for everyone – and this includes preventing accidents before they happen. Report your concern to your manager or supervisor.



WHAT SHOULD I DO?

I cut myself on the job and because it was small my manager said not to report it. Aren't we supposed to report all injuries?

Yes. No matter how small, all injuries and accidents should be reported.



Human Rights

Protecting and supporting human rights is the Company's responsibility

We believe that protecting and supporting human rights is our fundamental responsibility as an employer. We comply with applicable employment and human rights laws and regulations where we have operations to ensure alignment with the following values:

- We provide fair and equitable wages, benefits and other conditions of employment in accordance with local laws and regulations.
- We do not allow child labor in our operations.
- We do not use or engage in any form of coerced, indentured, or prison labor.
- We provide a safe and healthy work environment including Personal Protection Equipment (PPE) and the tools to work safely.
- We promote a workplace that is free of discrimination and harassment and prohibit threats of abuse.

We embrace diversity in the workforce and supplier base, create an environment that promotes diverse opinions and equal opportunity for all, and operate with an ethical culture that treats people with respect and dignity.



5

Commitment to **ACCOUNTABILITY**

As a company and as individuals, we accept full responsibility for our performance and acknowledge our accountability for the ultimate outcome of all that we do. We strive for continuous improvement, believing that competence, reliability, and rigorous adherence to process discipline are the keys to excellence.

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PROTECTING the Company's Assets

We safeguard the Company's assets, including the knowledge, data and things we use every day to do our jobs.

Recognize that our physical, electronic, financial and information assets help drive our business success. Use these assets responsibly to carry out business-related purposes.

Property and Equipment

We all have a responsibility to use the Company's assets in an economical and efficient way. Physical assets such as supplies, equipment and Company vehicles are provided to help you do your job and, in general, should not be used for personal reasons and may never be used for personal financial gain. There may be limited circumstances where personal use of Company resources is acceptable. If you have questions about those situations, discuss them with your manager.

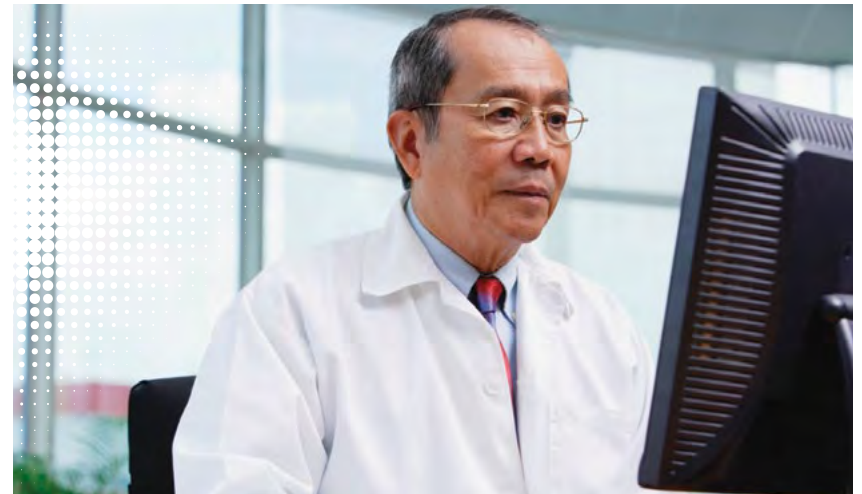
Personal Use of Communication Tools

Communication tools such as computers and software, email systems, phones and voicemail are important Company assets that allow us to do our jobs efficiently.

We rely on you to protect them from damage, loss, waste, misuse and theft.

Limited personal use of Company communication tools is allowed as long as your use complies with our policies and doesn't interfere with your job. However, our Company reserves the right to monitor your use of our electronic systems, including phone calls, emails and internet usage and to review any communications stored, viewed, sent or received on our systems.

Quest's assets may never be used to send or receive offensive, threatening, abusive or obscene material.



A CLOSER LOOK

[Personal Phone Call, Cell Phone, and Electronic Device Policy](#)

PROTECTING Confidential Information

We have a duty to safeguard our confidential business information and protect the privacy of information that our patients and clients entrust to us.

Information – about our Company, our customers, our employees and our patients – drives our business. You have a responsibility to preserve and protect our confidential information. Make sure you know the kind of information that is considered confidential and never disclose it to others, inside or outside of our Company, who are not authorized to access the information as part of their job.

Confidential information includes:

- Personally Identifiable Information (PII) and Protected Health Information (PHI) about patients and employees.
- Information about our business, such as new product research, product specifications and designs, business strategies, customer lists and nonpublic financial information including trade secrets.
- Information about customers, suppliers, research partners and other third parties, such as information protected under non-disclosure agreements.

A CLOSER LOOK

[Confidential and Proprietary Information](#)

WHAT IS “PII”?

PII (Personally Identifiable Information) is any data that could be used to identify, contact or locate an individual, including name, address, date of birth, Social Security number, credit card data or driver’s license number.

WHAT IS “PHI”?

PHI (Protected Health Information) is a specific kind of personal information that identifies an individual (such as a name, phone number, email address or medical record number) and relates to a person’s physical or mental health, their treatment or their payment for healthcare. Examples include:

- Complete requisitions
- Patient reports
- Patient bills
- Completed insurance claim forms

General Data Protection Regulation (GDPR)

Quest Diagnostics has incorporated European Union (E.U.) General Data Protection Regulation (GDPR) compliance into the company’s overall data protection framework. The GDPR applies to E.U. personal data that Quest Diagnostics collects and processes, such as in connection with employment, patient specimens, wellness testing, substance abuse testing, insurance screening, customers, clients, and suppliers.

A CLOSER LOOK

[Privacy of Protected Health Information \(PHI\) Policy](#)
[General Data Protection Regulation \(GDPR\)](#)

A CLOSER LOOK

[Privacy of Protected Health Information \(PHI\) Policy](#)

Employee Information

PHI and PII of employees should be kept confidential, too. If your job involves access to personal information about employees, handle it with care, observing the same restrictions outlined above.

WHAT SHOULD I DO?

A sales rep of a supplier who has been working with us a long time wants to get in touch with a Company employee at home. Can I give him the employee's cell phone number?



No. Never disclose any personal information, including phone numbers, pertaining to any employee unless the employee or another authorized person gives you permission. You must confirm that sharing the information is for a business purpose.

Security Awareness

At Quest Diagnostics we create, receive, maintain, process, and transmit large amounts of patient, customer, employee, and company confidential information. Therefore, it is the duty of every Quest Diagnostics employee to protect this information by complying with the companies Security policies, and

procedures. Be aware of your [security responsibilities](#). Share confidential information only with authorized individuals. Use secure methods for electronically transmitting confidential information.

Company owned equipment should only be used for Quest Diagnostics business purposes. Maintain security of your work area. Lock your computer screen when you step away from it. Use caution when opening email from unknown sources or click on unknown links and be very suspicious of emails seeking your credentials or confidential information.

Employees are our first line of defense in spotting and defending against security threats like phishing, social engineering, etc. For more information refer to [Security Awareness page](#) and [Security Internet site](#).

WHAT SHOULD I DO?

I noticed a Company-owned laptop on the seat of a car in the parking lot. Is that considered safe?



No. This is not a safe way to maintain any Company device. Report it to your manager or call the [IT Service Desk](#).

I received an email that appears to be from my boss asking me to urgently send him a list of all the employees in the department, and their payroll information. However, I notice that the 'from' address is an external email address, and not my boss's questdiagnostics.com email address. What should I do?



No. This is a phishing attempt. Be suspicious of emails that you receive from an external sender claiming to be your boss or other familiar contact and asking for confidential information. Report any suspicious emails to phish@questdiagnostics.com or to the IT Service Desk.



Intellectual Property and Trade Secrets

Our intellectual property, including trade secrets, is a critical asset that we need to protect. Intellectual property includes patents, copyrights, trademarks, trade secrets and other confidential information.

Employees must adhere to copyright laws and respect the copyrights of other parties. Unauthorized use, reproduction, or distribution of copyrighted material is prohibited. Generally, unless movie clips or other video media are in the public domain (that is, no copyrights attach) then the use of such movie clips or video media without a license or permission is prohibited. For written materials, like excerpts from articles, scientific journals and books, please check at [RightFind Advisor](#) to verify that Quest has permission for use of such copyrighted material.

Also, competitors, vendors, marketing firms and others may look for ways to access and use our trade secrets and confidential information, so guard it carefully:

- Only disclose our trade secrets or other confidential information to those colleagues who are authorized to access the information as part of their jobs.
- Do not talk about confidential business information in public places such as elevators, airports and restaurants.
- Do not discuss confidential information with your friends or family.
- Do not remove confidential material from Company premises without the approval of your supervisor.
- Company trademarks and logos should not be used for commercial purposes without appropriate Company authorization.
- Never share our intellectual property or trade secrets with anyone outside of Quest Diagnostics unless it is for a legitimate business reason, you have obtained the appropriate approvals, and you have implemented the proper safeguard(s) such as a non-disclosure agreement.
- Do not participate in customer surveys or supplier questionnaires, or provide suppliers with confidential information in exchange for “free” instruments or reagents.
- Do not agree to serve as an “industry expert” for other companies or institutions.

A CLOSER LOOK

[Intellectual Property Digital Workspace](#)
[Page “Protecting Our Trade Secrets and Confidential Information” Flyer](#)

WHAT IS A “TRADE SECRET”?

A trade secret is any information not known to the public that provides a competitive advantage or has an important economic value by virtue of not being known to the public. A trade secret is confidential information.

Examples of trade secrets include:

- Assay costs and profit margins
- SOPs, internal controls, validation processes
- Customer lists
- Marketing strategies and business plans
- Test volumes
- Preferred suppliers

WHAT SHOULD I DO?

I received an email survey from a potential supplier asking about test volume, our preferred instrumentation and our general cost of reagents. The survey was industry-wide, so it should be okay for me to answer the questions, right?

Wrong. It is never appropriate to participate in customer surveys or supplier questionnaires like this because in doing so, you may inadvertently disclose valuable, confidential information and put our intellectual property at risk. Check with your manager or supervisor to determine what is appropriate to discuss with the supplier.

Q&
A



Records Management

An effective records management program is essential to manage all of the business records we create, and are required to maintain, for business and regulatory purposes. Our program ensures that we create, maintain and store records in a manner that makes them easy to retrieve when needed and outlines the rules for the destruction of records when their retention requirement (as defined in our records retention schedule) has been met.

Legal Holds

As a result of pending litigation and investigations, many records must be retained beyond time frames required by our normal records retention schedule. The extended retention is called a Legal Hold and these records cannot be destroyed until notification is received from the [Legal](#) Department.

A CLOSER LOOK

[Records Management Program](#)
[“For the Record” Brochure](#)

WHAT IS A “BUSINESS RECORD”?

A business record is any information in any format (including electronic or paper records, slides and paraffin blocks) that records a business dealing, certifies a significant business transaction, sets policy or establishes guidelines or procedures. Ask yourself: “Does it document my daily business activities, relate to why a decision was made or otherwise support the Company’s business activities?” If the answer is yes, then it is a business record.



ACCURATE Financial Records

We are honest,
accurate and complete
in our recordkeeping.

Accuracy in recordkeeping is essential to maintaining the trust of our stockholders, customers and business partners, and is a responsibility we all share. In every transaction, comply with our internal systems, controls and procedures to ensure compliance with the law and the proper management of our records. If you are involved in any aspect of our accounting or financial reporting processes, make sure our records accurately and honestly reflect all transactions. Never misreport or misrepresent data or information, and never establish any undisclosed or unrecorded funds, liabilities or assets for any purpose.

Fair Disclosure in Public Reporting

Our Chief Executive Officer and Senior Financial Officers are responsible for ensuring that our financial statements, public reports and communications contain disclosure that is full, fair, accurate, timely and understandable. We maintain effective disclosure controls and procedures and internal controls for financial reporting. Be alert for errors in our disclosures and immediately report any suspected inaccuracies.

A CLOSER LOOK

[Policy Regarding Public Disclosure of Nonpublic Information](#)

WHAT SHOULD I DO?

We just completed a large purchase agreement with a supplier. Is it possible to post-date the initial payment so our current quarter accounting period looks more positive?

No. You must report payments as they occur, with proper corresponding documentation, to ensure our records are maintained honestly and accurately.



Authorization Matrix

Our [Authorization Matrix](#) is a key element of our internal controls. It promotes transparency and helps protect our Company from risk by defining who is authorized to approve spending, transactions and contracts on behalf of Quest. If your position involves making an expenditure, or authorizing a transaction or contractual arrangement of any kind, make sure you consult this Matrix, and follow all of the requirements before proceeding.

AVOIDING Conflicts of Interest

We make business decisions based strictly on the best interests of Quest Diagnostics, without regard to personal concerns, and avoid even the appearance of conflict between personal interests and the interests of the Company.

A conflict of interest occurs when you have personal, financial or other interests that may interfere with your ability to perform any of your work for the Company objectively and effectively. A conflict of interest also arises if you or your family receive an improper financial benefit as a result of your position with our Company.

Examples of conflicts of interest include:

- **CONFLICTING PERSONAL FINANCIAL INTERESTS.**
You or a family member having a personal financial interest in a supplier, customer, competitor or distributor.
- **CONFLICTING OUTSIDE BUSINESS INTERESTS.**
Working for or consulting with any business that provides healthcare-related services or products without the appropriate approvals.
- **ACCEPTING AN IMPROPER PERSONAL BENEFIT.**
Accepting personal compensation or benefits from any customer, supplier or business partner, except as permitted by Company policies.

- **CORPORATE OPPORTUNITIES.** Taking an opportunity for yourself, a friend, a relative or another company that is meant to benefit Quest Diagnostics.
- **SUPERVISING A FAMILY MEMBER.** Working in a role where you are supervising or reporting to an immediate relative or significant other.

Awareness of these kinds of conflicts can help you avoid them. Any employee requesting review and approval of a potential conflict of interest must complete the **Conflict of Interest Disclosure Form** located on the HRSC portal, and return it to the HRSC.

A CLOSER LOOK

[Outside Positions & Conflicts of Interest Policy](#)



WHAT SHOULD I DO?

I have been offered a part-time job on weekends doing work for a company that is similar to Quest Diagnostics. Can I accept it?

Q&
A

Outside employment such as this may create a conflict of interest. Before you accept the position, consult our policy and discuss it with your supervisor or [HR Service Center](#) to determine the appropriate next steps.

My sister is an administrator of a medical supply company. Can she do business with Quest Diagnostics?

Q&
A

Maybe, if you are not in a position to select her company as one of our vendors, and are not involved in making decisions related to this aspect of our business. Make sure you disclose the relationship and take the steps that you are directed to take in order to avoid even the appearance of a conflict.

Gifts Offered to Employees

Do not accept gifts or items of value from current or prospective vendors, suppliers or customers. This includes publication fees, honorarium or other compensation for participating in business-related professional committees,

seminars or workshops. You may accept promotional items of minimal value such as pens, caps, mugs, t-shirts and educational items that relate to your job function.

Travel, Meals and Entertainment

You generally may not allow potential or current vendors, suppliers, contractors or clients to pay for your travel or entertainment expenses. You may, however, accept a modest meal from a third party when the meal is provided in connection with a meeting to discuss Company business or in connection with some events such as seminars. Before accepting any meals, consult our policy.

A CLOSER LOOK

[Gifts and Entertainment Offered to Employees Policy](#)

WHAT SHOULD I DO?

If I go to a lunch meeting with a supplier to discuss a product that Quest is interested in, is it permissible for the supplier to buy lunch during this business discussion?

Q&
A

Yes. You have a legitimate business purpose to be there, so you may accept a reasonable meal at a reasonable cost.

INSIDER Trading

We do not trade on material, nonpublic information about our Company or companies with which we do business.

In your work, you may come across material, nonpublic (“inside”) information – information that has not been made public through authorized channels, and that a reasonable investor might use to buy, sell, hold or otherwise trade in securities. Such information may pertain to Quest Diagnostics or a current or prospective customer, supplier or business partner. Remember, even if information is not material to Quest, it may be material to our business partners.

Information is considered public only when it has been released to the public through appropriate channels (for example, through a press release or a filing with the SEC) and enough time has elapsed to permit the investment market to absorb and evaluate the information.

It is illegal for you to use inside information to make a trading decision. It is also illegal for you to provide others with inside information so they may trade – a practice called “tipping.”

EXAMPLES OF MATERIAL, NONPUBLIC INFORMATION MAY INCLUDE:

- Financial forecasts or results for Quest or our business partners
- Proposed acquisitions, mergers, divestitures, joint ventures or contracts
- New products or clinical or research discoveries by Quest or our business partners
- Management changes
- Business proposals and transactions. Remember, entering into or losing a contract with Quest may be material to our business partner even if it is not material to us.

Our policy also restricts whether and how employees may purchase or sell Company stock and the stock of other laboratories and pathology providers. Make sure you read and understand our policies before trading in our stock or the stock of another laboratory or pathology provider.

A CLOSER LOOK

[Securities Transactions Policy](#)

[Public Disclosure of Nonpublic Information Policy](#)

WHAT SHOULD I DO?

I work in accounting, and we just finished calculating our quarterly earnings results. Since everyone in our department knows the results, can I purchase Company stock?

Q&
A

No. This is considered material, nonpublic information. Trading on this information or any other inside information you know about because of your job, would be illegal.

A friend of mine always asks me about my job. If she is not an investor, can I tell her about a proposed Company management change that has been discussed in some recent meetings?

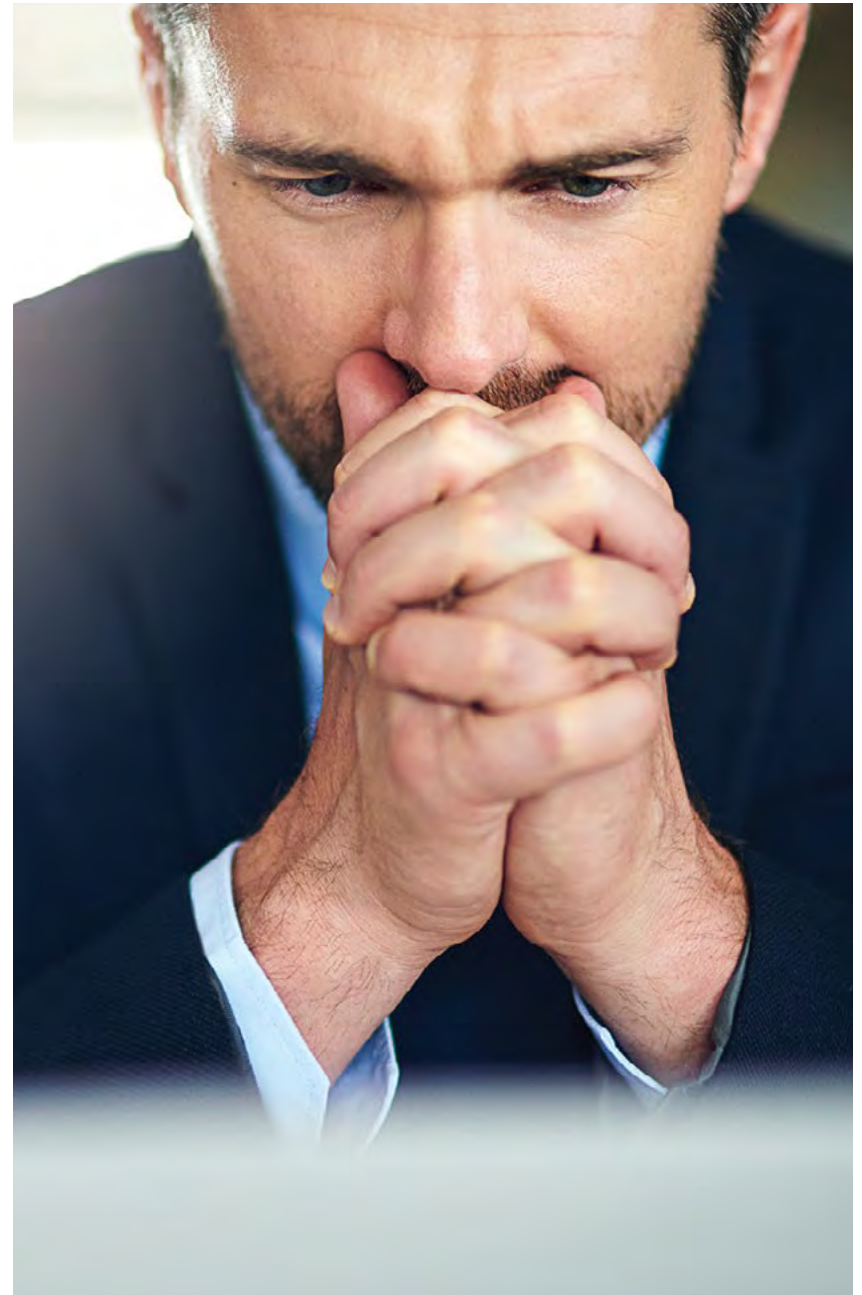
Q&
A

No. Material, nonpublic information about our Company such as this should never be revealed to anyone.

A customer told me that the clinic she works for may soon be bought by a large medical corporation but she doesn't know for sure. Can I purchase stock in the corporation?

Q&
A

No. This is inside information that you found out about as a result of your job, so if you make a trade based on that information, or tell anyone what you have heard and they make a trade based on it, your action would be illegal.



WHO to Contact

Resource:	Contact:
CHEQline	CHEQline: 1.800.650.9502 Website: MyComplianceReport.com Use access ID: QDI
Compliance Department	Compliance Digital Workspace
Corporate Communications	Email: MediaContact@questdiagnostics.com Email: SocialMedia@questdiagnostics.com or call 973.520.2800
Corporate Procurement	Corporate Procurement Digital Workspace
Employee Response Line	Phone: 1.800.513.6287 Email: ERL@questdiagnostics.com
Finance	Finance Digital Workspace
Government Affairs Department	David Reiner, Senior Director, State Government Affairs Phone: 973.520.2292 Email: David.M.Reiner@questdiagnostics.com
HR Service Center	Submit a Request: Your HRSC Phone: 855.411.8511; M-F 8am-8pm ET Fax: 610.271.4475; Fax Cover Sheet Mail: Attn: NOC – HR/10441 University Center Dr., Tampa, FL 33612
Investor Relations	Email: Shawn.C.Bevec@questdiagnostics.com
Legal Department	Legal Digital Workspace
Medical Quality	Medical Operations, Quality and Regulatory Digital Workspace

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