



# Quest Diagnostics Supplier Code of Conduct



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## Introduction

### Quest Diagnostics vision and values:

Our vision is empowering better health with diagnostics insights.

Our values include quality, integrity, innovation, accountability, collaboration, and leadership.

Our vision and values drive the performance and behaviors of Quest Diagnostics Incorporated, including its subsidiaries, majority joint ventures, affiliates, and subsidiaries.

This Supplier Code of Conduct expresses the expectations for our suppliers when doing business with Quest Diagnostics.

## Compliance with the Supplier Code of Conduct

Suppliers and their employees, agents, and subcontractors (collectively referred to as “Suppliers”) must adhere to this Supplier Code of Conduct that is specific and agreed upon with award of business through a binding contract while conducting business with or on behalf of Quest Diagnostics. Suppliers must meet all applicable laws including labor rights and working conditions. Suppliers must promptly inform their Quest Diagnostics contact (or a member of Quest Diagnostics management) when any situation develops that causes the Supplier to operate in violation of this Code of Conduct. While Quest Diagnostics Suppliers are expected to train, self-monitor, and demonstrate their compliance with this Code of Conduct, Quest Diagnostics may audit Suppliers or inspect Suppliers’ facilities to confirm compliance. Quest Diagnostics may require the immediate removal of any Supplier representative(s) or personnel who behave in a manner that is unlawful or inconsistent with this Code of Conduct or any Quest Diagnostics policy. Compliance with this Code of Conduct is required in addition to any other obligations in any agreement a Supplier may have with Quest Diagnostics.

## Business practices and ethics

**Bribery and anti-corruption:** Quest Diagnostics will not tolerate bribery in any form. Our Suppliers may never pay, promise to pay, and 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.

**Conflicts of interest:** We expect Quest Diagnostics employees to make business decisions based strictly on the best interest of Quest Diagnostics, without regard to personal concerns, and to avoid even the appearance of conflict between personal interests and the interest of the company. We also expect that all Suppliers conduct business as professionals without even the appearance or perception of a personal or business conflict of interest when dealing with Quest Diagnostics. All potential conflicts must be disclosed and reported to Quest Diagnostics for investigation and remediation.

**Eligible persons and excluded providers:** Quest Diagnostics and its Suppliers may not employ or contract with any individuals or entities if those individuals or entities have been excluded, suspended, debarred, sanctioned, disqualified, or otherwise deemed ineligible to participate in any federal or state-funded healthcare program or federal procurement or non-procurement program.

**Financial records:** Quest Diagnostics expects Suppliers to maintain accurate and complete financial records and reporting documents, using generally accepted accounting principles that are compliant with the law.

**Gifts and entertainment:** Quest Diagnostics personnel cannot accept gifts or items of value from current or prospective Suppliers or customers. This includes publication fees, honoraria, or other compensation for participating in business-related professional committees, seminars, or workshops. Quest Diagnostics employees may only accept Supplier promotional items of minimal value. Suppliers may not offer anything to Quest employees that would violate this policy and must promptly report any requests received from Quest Diagnostics employees for items of value.

**Insider trading:** In our business interactions, Suppliers 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. It is a violation of law and our policies for our Suppliers to use or disclose inside information or make a trading decision based upon that information.

**Record retention:** Quest Diagnostics and its Suppliers must manage all business records in accordance with federal, state, and local laws and regulations that set forth specific retention periods for records. Government agencies may require Quest Diagnostics and its Suppliers to provide documents to demonstrate compliance with these regulatory requirements and/or to verify the propriety of reimbursements for laboratory procedures.

## Legal and regulatory compliance practices

**Export and import controls:** Quest Diagnostics expects its suppliers to comply with all US and international laws and regulations related to the import and export of products, services, and information to and from the US. These include medical and dangerous goods items as well as technical documentation, such as software and/or data transfer, that are regulated with proper documentation required for customs brokerage and clearance.

**Fair competition/antitrust:** Quest Diagnostics and its Suppliers must comply with all antitrust and fair competition laws. Prohibited business practices include: interference with free and open competition, price fixing, bid rigging, improper exchange of information, and allocating markets or territories.

## Environmental, health, and safety

**OSHA—occupational health and safety:** Quest Diagnostics and its Suppliers are responsible for complying with all environmental health and safety policies and procedures as well as all applicable laws and regulations to ensure a safe and healthy workplace. Quest Diagnostics expects timely reporting and correction of any unsafe work practices or conditions. Be aware that Quest Diagnostics facilities are drug-free, alcohol-free, and weapon-free.

**Supplier quality, collaboration, and continuous improvement:** Quest Diagnostics expects Suppliers to provide the highest-quality products and services and to embrace an ethic of transparent quality collaboration.

All Suppliers are expected to operate under quality-management principles that meet industry standards, strive for zero defect manufacturing, use statistical analysis to reduce variation, and, where applicable, comply with FDA quality standards and regulations. The core mission of Quest Diagnostics is the well-being of patients. The quality of the products and services provided by Suppliers is critical to assuring the health and well-being of the patient.

## Labor practices and human rights

**Quest collective bargaining/freedom of association:** Quest is committed to respecting its employees' freedom of association consistent with applicable federal, state, and local law. In accordance with such laws, Quest respects employees' rights to freely choose whether or not they wish to be represented by any association/union, bargain collectively, and engage in other concerted activities for mutual aid and protection. The Company is further committed to creating an environment of open communication in which associates can speak with their managers about their ideas, concerns, or problems and work together to address workplace issues. We encourage our employees to share their ideas, concerns, or suggestions through a culture of cooperation and teamwork. Where our employees have chosen to be represented by a labor organization, the Company respects that choice and bargains in good faith related to employees' terms and conditions of employment. At all of our locations, employees are able to communicate openly with management about terms and conditions of employment without threat of harassment, intimidation, or reprisal. We also require all of our Suppliers to comply with federal, state, and local laws, including those related to employee freedom of association.

**Conflict minerals:** If applicable, Supplier shall cooperate with Quest Diagnostics to provide timely, written responses using reasonable inquiry and effort to identify and eliminate the presence of any conflict minerals in products, supplies, or materials that Supplier provides to Quest Diagnostics. These minerals include cassiterite, columbite-tantalite, gold, wolframite, and their derivatives, which are limited to tungsten, tantalum, tin, gold, and potentially other minerals the US Secretary of State may designate.

**Human rights:** Quest Diagnostics believes that protecting and supporting human rights is a fundamental responsibility of the Suppliers. We expect our suppliers to conduct business in a manner consistent with applicable employment and human rights laws and regulations where they have operations to ensure alignment with the following values:

- Provide fair and equitable opportunity, wages, benefits, and other working conditions of employment
- Prohibit utilization of child labor and human trafficking in workforce operations
- Prohibit coerced, indentured, or prison labor
- Provide a safe and healthy work environment, including personal protection equipment (PPE) and the tools to work safely
- Ensure a workplace that is free of discrimination and harassment, and prohibit threats or abuse
- Maintain an inclusive culture that values the diversity and opinions of all employees

**Small business and diverse suppliers:** Quest Diagnostics is committed to diversity among our suppliers and recognizes the important contributions made by small businesses to our economy and expansion of our markets. Quest Diagnostics encourages small businesses to register with the Small Business Administration and System for Award Management (SBA/SAM) and obtain any applicable diversity certifications, including Minority, Women-Owned, Veteran-Owned, Service-Disabled Veteran-Owned, Small Disadvantaged, and Historically Underutilized Business Zones (HUBZone).

**Environmental, social, and governance (ESG):** Quest Diagnostics understands that corporate responsibility extends to our entire supply chain. We appreciate business partners who share our values and corporate stewardship and understand that how we conduct business and contribute to our society, environment, and communities is critical to our future success and growth.

- Responsible environmental impact: Quest Diagnostics and its Suppliers shall operate facilities, services, and production to effectively manage risks, conserve natural resources, and protect the environment



- Quest Diagnostics encourages and supports community engagement and philanthropic giving and a supply chain that includes small and diverse owned businesses
- Quest monitors ESG metrics with Suppliers that provide business and operationally critical products and services. Quest expects its Suppliers to collaborate with this effort and to address all significant actual and potential negative social impacts as a condition of doing business

## Protection of data and intellectual property

Quest Diagnostics is committed to protecting the confidentiality, integrity, and availability of the information provided to us by our customers, patients, and business partners as well as confidential information we generate in performing services.

### Data protection and information security:

- Suppliers must have a nondisclosure agreement (NDA) in place prior to receiving any Quest Diagnostics confidential, proprietary, and intellectual information, including but not limited to financial, operational, commercial, technical, organizational, and scientific information as well as anything that Quest Diagnostics considers confidential, by verbal or written direction
- Suppliers must take all necessary steps to protect all Quest Diagnostics confidential, proprietary, and intellectual information as required by federal, state, or foreign laws and regulations, including but not limited to the Health Insurance Portability and Accountability Act (HIPAA)/Health Information Technology for Economic Clinical Health (HITECH) Act, Business Associate Agreement (BAA), General Data Protection Regulation (GDPR), and the California Consumer Privacy Act (CCPA)
- All suppliers that access, handle, process, transmit, or store Quest Diagnostics confidential, proprietary, and intellectual information electronically external to the Quest Diagnostics IT network are subject to Quest Diagnostics IT Security Assessment to ensure proper controls are in place

Quest Diagnostics expects its Suppliers to maintain a comprehensive, enterprise-wide IT security program with a dedicated IT security leader. Such program will include policies and practices as well as industry-standard

physical, logical, and technical measures to protect the facilities, systems, networks, and security of the data. Supplier will have detailed incident management and notification procedures in the event of a data breach or security incident affecting Quest Diagnostics confidential, proprietary, and intellectual information and/or the systems and networks that support such information.



## Reporting questionable behavior

- It is important that Quest Diagnostics Suppliers have an open avenue to discuss questions or concerns regarding this Supplier Code of Conduct
- Suppliers should report any knowledge or good-faith belief that this Code, a law, company policy, or ethical guideline has been, is being, or may be violated
- Contact Corporate Procurement: <https://secure.questdiagnostics.com/Views/Flash/servlet/viewsflash?cmd=page&pollid=contactus!purchasing>
- Quest Diagnostics has an established CHEQLine to give every Supplier an opportunity to anonymously report any question, concern, or potential issue regarding the application of any law, regulation, or company policy relating to this Supplier Code of Conduct:

**1.800.650.9502**

**MyComplianceReport.com** (internet access ID:QDI)

For locations outside the US, use an outside line and dial:

**Canada** 1.800.650.9502

**Ireland** 1.800.550.000

**Mexico** 001.880.650.9502

**India** 0.001.800.650.9502

**Brazil** (2 access codes)

0 800.890.0288

0 800.888.8288

**China** (4 access codes)

South Shanghai 10.811

North Beijing 108.888

China Telecom Mandarin 108.10

North Beijing Mandarin 108.710

