

RTI International Code of Conduct

President's Message

A Message from Our President, Dr. Wayne Holden

Dear Colleagues,

At RTI International, our steadfast commitment to the highest ethical and business standards, as set forth in our Code of Conduct, underpins everything we do.

Whether we're collaborating with our clients or interacting with our RTI colleagues, we understand that behaving ethically enhances our reputation, making it possible for us to conduct rigorous, objective research to address the world's most critical problems.

As we operate in an increasingly complex world, where laws and business practices vary from country to country, and as we engage with emerging technologies that are rapidly changing our world, adherence to the RTI Code of Conduct is vital to upholding our hard-earned reputation and achieving continued success. The standards of behavior outlined in the Code make perfectly clear our expectation that staff members practice our most important values. Complying with the Code is a condition of employment at RTI; therefore, employees are required to acknowledge annually that they understand and comply with it.

Since 1958, clients have consistently recognized RTI for our ethical business practices. In recent years, we've received recognition as one of the world's most ethical companies by the Ethisphere Institute. The growth of our reputation—and the value that accompanies it—would not be possible without our Code of Conduct. Thank you for complying with the Code and for practicing it every day.

Vision, Mission, and Values

Our Vision

We address the world's most critical problems with science-based solutions in pursuit of a better future.

Our Mission

To improve the human condition by turning knowledge into practice.

Our Values

Integrity

We perform with the highest ethical standards of individual and group honesty. We communicate openly and realistically with each other and our clients.

Excellence

We strive to deliver results with exceptional quality and value.

Innovation

We encourage multidisciplinary collaboration, creativity, and independent thinking in everything we do.

Respect for the Individual

We treat one another fairly, with dignity and equity. We support each other to develop to our full potential.

Respect for RTI

We recognize that the strength of RTI International lies in our commitment, collectively and individually, to RTI's vision, mission, values, strategies, and practices. Our commitment to the Institute is the foundation for all other organizational commitments.

Fiscal Responsibility

We operate with financial integrity and transparency. We are accountable for cost competitiveness and continuing financial responsibility.

Objectivity

Our work is independent of undue influences by political, economic, or other factors. We maintain the highest level of scientific objectivity in our work.

Introduction

It's in Our DNA

RTI International is an independent organization that is dedicated to carrying out innovative research to improve the human condition. RTI engages professional, competent individuals who make good decisions in difficult situations. How we do business and how we treat others define RTI to the rest of the world. Our Code of Conduct (the Code) provides an ethical framework to guide our conduct based on RTI's values.

Our Principles—integrity, purpose, accountability, responsibility, and quality—are encoded in the strands of our DNA and are evident in everything we do. RTI's good reputation is founded in our culture of honesty and integrity.

As a global organization operating in a complex world where laws and business practices vary from country to country, we are expected to behave honestly and with integrity in all our business interactions.

The Code is a practical resource to help each of us to always do our jobs in an honest and ethical manner. Read it, refer to it often, and ask questions when something is not clear to you. RTI policies on specific matters are referenced in the Code for your convenience and provide additional and more detailed information. Anyone who does business with or on behalf of RTI must comply with the Code. This includes our employees, suppliers, and other partners worldwide.

Ethics in Practice

Speak Up

RTI cannot be true to the principles in the Code without the participation of every employee. We are all responsible for recognizing ethical issues, for using the tools and guidance in the Code to think through these issues, and for seeking advice whenever necessary during this process.

When we work for RTI, we must respect and comply with the principles of the Code, as well as with RTI's policies and procedures and any applicable laws, regulations, and contractual provisions and requirements. If you are aware of a violation of the Code or the law, you must report it to the RTI Ethics Office. In addition to the Ethics Office, staff can also report concerns to their supervisors or other managers in their department, or to their Human Resources Business Partner. Speaking up is not always easy, which is why RTI offers many ways to confidentially report a violation. RTI's Ethics Officer may be reached via email at ethics@rti.org, or anonymously through the RTI Ethics Helpline or web Direct Access form.

The RTI Ethics Officer will keep all information anonymous or confidential to the extent practicable. Matters reported to the RTI Ethics Office are taken very seriously and are reviewed promptly and fairly.

Ethical Decision-Making Model

The Code cannot cover everything or tell you how to behave in every specific situation. However, it is intended to provide general guidance to ensure that employees always behave ethically. When you encounter an ethical issue, use the following steps as a guide:

1. Define the issue and identify possible solutions.
2. Ask yourself the following questions before you act:
 - Are the solutions legal?
 - Do the solutions comply with the law and RTI's policies, regulations, and contract requirements?
 - Which solution best supports RTI's values?
 - Would I feel comfortable seeing my actions reported in a newspaper?
3. Select the best solution based on your answers to these questions. If you are not sure how to approach the situation, please contact your supervisor, your Human Resources Business Partner, or RTI's Ethics Office for guidance

Investigations

Investigations are an integral part of maintaining an ethical culture. All alleged violations of the Code, RTI's policies and procedures, or the law are investigated. The scope and nature of those investigations are determined by the RTI Ethics Office and vary depending on the specific details of the alleged violation. When the Ethics Office receives a report of an alleged violation, the office develops an investigation plan that, in some cases, includes assembling a cross-functional investigative team with subject-matter expertise. Although the Ethics Office leads most ethics-related investigations, it may—at its discretion—direct a subject matter expert in a different business function to conduct all or part of an investigation in certain circumstances. In such cases, the Ethics Office maintains oversight of the matter.

What you can expect from RTI:

- We handle all investigations in an appropriate, confidential, and expeditious manner to ensure that individuals are treated fairly and with respect.
- We have zero tolerance for retaliation. Retaliation is not allowed against any employee for reporting a suspected violation or for participation in an ethics investigation. Employees, regardless of seniority or status, who take part in retaliatory activities will be subject to disciplinary action and could lose their jobs.
- If an investigation reveals that corrective action is warranted, RTI will take steps to appropriately address identified issues in an effort to prevent them from happening again. Corrective actions range from verbal warnings and enhanced training to termination of employment.

What RTI expects from you:

- Cooperate fully with the investigation of any alleged violation or inquiry when requested and answer questions truthfully and to the best of your ability.
- Respect the confidentiality of the investigation process.
- Do not submit false accusations. Just as retaliatory behavior is not permitted, knowingly submitting a false report will subject you to disciplinary action.
- If asked to participate in an investigation, keep the investigation confidential. Do not spread information or participate in or perpetuate rumors related to any aspect of the matter.
- Do not carry out your own investigation. Report all suspected violations to the RTI Ethics Office, management, or your Human Resources Business Partner.

Respect for All

Respect for the Individual

RTI values and recognizes the unique backgrounds, skills, and perspectives of all employees. We view our diverse perspectives, cultures, backgrounds, and skills as a source of strength as we look to the future. To ensure our employees can thrive, we are committed to maintaining a work environment that is without violence, threats of violence, physical or verbal abuse, harassment, intimidation, or other disruptive behavior.¹

What you can expect from RTI:

- We provide equal employment opportunities to all employees and applicants without regard to race, color, religion, sex (including pregnancy), age, marital status, sexual orientation, gender identity, national origin, creed, citizenship status, disability, veteran status, or any other classification protected by applicable discrimination laws or RTI policy.
- We commit to building on what we have in place to achieve and maintain a diverse workforce that works together in an inclusive environment.
- We provide training on what it means to treat one another with respect.
- We will not tolerate any form of harassment, including bullying, intimidation, or harassment on account of sex, race, age, disability, or any other protected characteristic.
- We will take appropriate action to correct any violations of the Code, up to and including termination of employment.

What RTI expects from you:

- Do not engage in any behavior that could be threatening, harassing, intimidating, physically or verbally abusive, or disruptive. This includes making comments or jokes that could make others feel uncomfortable, using an offensive or disrespectful tone of voice, or engaging in any other conduct that could create a hostile work environment or offend another person.
- Do not make unwelcome sexual suggestions or comments, requests for sexual services, or other types of nonverbal (e.g., noises, gestures) or physical (e.g., touching, pinching, brushing the body) conduct of a sexual nature.
- Be sensitive to, and respectful of, cultural differences. This means avoiding verbal, written, or physical conduct that disparages or is hostile toward people because of their race, color, religion, sex (including pregnancy), age, marital status, sexual orientation, gender identity, national origin, creed, citizenship status, disability, veteran status, or any other classification protected by applicable discrimination laws or RTI policy.
- Listen attentively and be considerate to other people.
- Do not engage in inappropriate discussions involving the confidential information of others—just because someone has disclosed their confidential information to you does not authorize you to share that information with others outside of management, Human Resources, or the Ethics Office.
- Communicate and act politely and honestly with and toward other people.
- Do not participate in gossip or spread mean-spirited, disparaging, or harmful information about other people.
- Do not use screen savers or display pictures or other printed materials in work areas that could be offensive to other people.
- Appreciate and learn from the unique experiences and perspectives each individual brings to RTI.

¹ RTI Policy References: 4.1 Equal Employment Opportunity; 4.3 Prohibition and Prevention of Harassment, Discrimination, and Retaliation; 4.4 Workplace Violence Prevention.

- If you see harassment, bullying, or intimidation, report it to Human Resources or the RTI Ethics Office immediately.

Human Rights Protection/Safeguarding

RTI is committed to conducting business in a manner that respects and supports the rights inherent to all human beings. This includes protecting children and anyone else who is in any way part of, engaged with, or affected by any RTI work. Therefore, all employees, vendors, suppliers, and business partners who work with RTI are expected to carry out operations in a manner that shows the highest respect for individual human rights.²

What you can expect from RTI:

- We have zero tolerance for child exploitation, neglect, and abuse.
- We have zero tolerance for engaging in human trafficking or any activities related to human trafficking.
- Our policies support human rights, such as child safeguarding, prohibition of human trafficking, and declaration of human rights.

What RTI expects from you:

- Ensure that all children benefit from RTI's services and are protected from harm.
- Do not engage in any form of sexual abuse, exploitation, commercial sex acts, or use of forced labor—even if these activities are legal in the country where they are performed.
- Do not have sexual relationships with children, and do not have sexual relationships with beneficiaries in exchange for assistance.
- Commit to protecting the confidentiality of children's information; obtaining informed consent before interviewing or photographing children for project purposes; and ensuring that no picture, post, or other communication is suggestive or presents children in an undignified or disrespectful manner.
- Report any safeguarding breaches in our operations to the Ethics Office or Office of Corporate Counsel.

Respect for RTI

The hard work and investment of many different groups—employees, customers, suppliers, subcontractors, and others—have provided RTI with facilities, equipment, materials, property, and other assets. These assets are intended to promote the many interests of RTI.

We have a shared duty to protect all property entrusted to us, including equipment, tools, and all materials and information used in connection with the work we do (whether developed by us or provided by a client or third party). In most cases, any Intellectual Property that is created or first produced by RTI employees in connection with their work at RTI is the sole property of RTI, not the employee who created or produced it.

Be aware that Data and RTI systems also belong to RTI, and we reserve the right to monitor system use at any time, to the extent permitted by law.³

What you can expect from RTI:

- Our policies clearly address maintaining access to RTI facilities and Global Technology Solutions (GTS) systems (e.g., access rights, privileges, and restrictions) and the appropriate access and handling of intellectual property, controlled/regulated data, and proprietary/sensitive information.

² RTI Policy References: 1.23 Prohibition of Human Trafficking; 1.35 Declaration of Human Rights; 12.9 Child Protection.

³ RTI Policy References: 1.11 Copyrighted/Proprietary Data and Materials; 4.4.1 Weapons Ban; 4.5 Drug-Free Workplace; 12.1 Environment, Health, and Safety; 12.4.5 Vehicle Operation.

- We commit to keeping the confidentiality of every employee's personal information. We limit access to your information and use it only for legitimate business purposes, such as the administration of Human Resources or Benefits programs.

What RTI expects from you:

- Make sure that any third party (e.g., subcontractor, consultant) who receives proprietary information from you has first signed a nondisclosure agreement with RTI and that the proprietary information you provide is appropriately identified, designated, or labeled as confidential or proprietary in accordance with the nondisclosure agreement.
- Do not take sensitive documents from RTI premises. If you must take them to do your work, be sure to keep the documents secure at all times.
- Do not take, make copies of, or use RTI confidential, proprietary, or sensitive information for personal purposes. All such information must be used exclusively for RTI business reasons.
- Keep your laptop, computer, and all other RTI data or systems safe.
- Be careful what you say in casual conversation. Pay attention to those around you who might overhear a business conversation.
- Dispose of papers, diskettes, CDs, audio tapes, and other items that are no longer needed in an appropriate manner.
- Inform your supervisor and the RTI Office of Corporate Counsel of any inventions or discoveries you create or produce, unless specified in a client contract that the intellectual property belongs to someone else.
- Never lend, sell, or give away RTI property.
- Be familiar with GTS and Data Management policies and how they apply to you.
- Do not come to work or operate company vehicles while under the influence of alcohol, illegal drugs, narcotics, or other unlawful substances.
- Do not bring weapons to any property or facility that is owned or controlled by RTI or store weapons in a vehicle owned or rented by RTI or parked on RTI property (including personal vehicles parked on RTI property) unless you are a law enforcement officer on RTI property in the line of duty or RTI security personnel or contractor specifically required to carry weapons as part of your job.
- Identify and prevent potential dangers in the workplace by reporting them to RTI's Occupational Health Office.
- Follow all security requirements for your specific work location.

Contributing to the Global Good

As a leader in the scientific community and to live our mission of improving the human condition, RTI is committed to delivering the promise of science for the global good in all areas. RTI gives back to the communities where we live and work and continually works to promote the sustainability of the environment through our research and corporate programs.⁴

What you can expect from RTI:

- We operate in a manner that demonstrates respect for the quality of the workplace and global environment.
- We conduct research to advance scientific knowledge and technology concerning the environment and workplace health and safety.
- We encourage development of new technology that improves the quality of the environment.

⁴ RTI Policy Reference: 12.1 Environment, Health, and Safety.

- We maintain a sustainability program with a focus on environmental impacts.
- We provide training programs for RTI employees that emphasize individual responsibility for sound environmental management.
- We administer charitable giving campaigns and events, staff and corporate-led volunteer efforts, and support to emergency and disaster relief.

What RTI expects from you:

- Participate in volunteer activities and other corporate programs, when feasible, to benefit the community.
- Carry out operations in a manner that shows the highest respect for the quality of the environment and complies with all environmental laws and regulations.
- Stay environmentally focused when conducting RTI activities and work.

Act with Integrity

Responsible Research

RTI is committed to protecting the rights, welfare, and privacy of individuals who participate in our research studies, as well as the confidentiality of the data collected during those studies.

RTI considers adherence to our company standards of responsible business and research conduct—as well as strict observance of all laws and regulations pertaining to our businesses around the world—to be not only a legal requirement but also an ethical obligation for all.⁵

What you can expect from RTI:

- RTI's Office of Research Protection maintains Institutional Review Boards (IRBs) that are responsible for reviewing and approving any human subjects research in which RTI staff are engaged.
- We are committed to maintaining a data protection program that complies with existing laws and abides by accepted data protection principles—including, but not limited to, the Health Insurance Portability and Accountability Act (HIPAA), Personally Identifiable Information and the U.S. Privacy Act of 1974, the Family Educational Rights and Privacy Act (FERPA), and the European Union General Data Protection Regulation (GDPR).
- We register with all appropriate oversight and regulatory authorities.
- We follow standard operating procedures to comply with all regulatory requirements that impact our projects.
- We provide training on topics such as the Collaborative Institutional Training, Data Privacy, Good Laboratory Practices, Good Manufacturing Processes, IRB Human Subjects, and others.

What RTI expects from you:

- If you are a researcher, you are responsible for minimizing the risks to human subjects who are involved in research performed by RTI and complying with relevant guidelines and requirements.
- Obtain approval from the IRB for research studies before contacting human subjects or collecting or using any human subjects' data.
- Be aware of what data you may encounter both in your research and in your day-to-day job functions. If you are not sure of what to do, contact the RTI Privacy Officer.

⁵ RTI Policy References: 1.22 Clinical Trials, Behavioral Health and Observational Studies, and Related Work; 1.26 Training of Personnel Using Vertebrate Animals in Research; 12.5 Data Protection Policy; 12.8 HIPAA Compliance for Research Projects with Business Associate Agreements.

- Complete trainings to stay up to date and informed on regulatory requirements.
- RTI researchers carrying out research with animals must comply with all regulations and guidelines for animals' humane care and use. Animal research must be reviewed and approved by the RTI Institutional Animal Care and Use Committee before it is carried out.

Conflicts of Interest

A conflict of interest occurs when an employee's personal interests (or the interests of other companies, persons, or groups) conflict with RTI's interests as an organization.

RTI's interests include the ability to accomplish our mission and vision, to be true to our values, and to meet our responsibilities to our clients.⁶

What you can expect from RTI:

- We provide fair and objective decisions that are in RTI's best interest.
- We thoroughly review any conflicts of interest reported to the RTI Ethics Office.
- We follow policies and procedures to minimize or avoid conflicts of interest.
- We screen for contracts that could create organizational conflicts of interest.
- We will not perform research that would put RTI's objectivity into question. Our staff must have full control over their research methodology and technical assistance activities without bias or influence from client interests.

What RTI expects from you:

- Do not allow personal interests to negatively affect, or appear to negatively affect, your loyalty and dedication to RTI's best interests.
- Bring possible conflicts of interest to the attention of the RTI Ethics Office and seek advice before doing anything that could interfere, or appear to interfere, with your ability to fulfill your duties to RTI.
- Do not make gifts, favors, or payments to obtain favorable action by a government agency.
- Do not give a gift that could create the impression that RTI may be trying to influence a person or group to give RTI special treatment.
- Do not accept or solicit any benefit from a supplier or potential supplier that might compromise, or even appear to compromise, your objective assessment of the supplier's price and product.
- If you have a potential business relationship with a close family member or friend, disclose the relationship to the RTI Ethics Office.
- Disclose any outside employment opportunities that are within the same or similar scope and field as the work you are performing for RTI, or potentially in competition with RTI, to the Ethics Office prior to engaging in the employment.
- Do not own, either directly or indirectly through a family member, a Significant Financial Interest in any business that does business with RTI, wants to do business with RTI, competes with RTI, or is owned in whole or in part by RTI, unless the RTI Ethics Office has given specific written approval in advance.
- Disclose to the RTI Ethics Office any outside financial interests (including stock ownership) that could potentially compromise, or appear to compromise, your professional judgment when designing, conducting, or reporting research.

⁶ RTI Policy Reference: 1.4 Conflicts of Interest.

Fiscal Responsibility

Everyone at RTI has a responsibility to our organization, our funders, and those who benefit from our research to use sound judgment when spending the organization's or our clients' money and to account for both this money and our time honestly and accurately. RTI is subject to strict guidelines in the recording of all costs to governmental contracts; honest accounting practices are also vital to our survival as an organization.⁷

What you can expect from RTI:

- We carefully account for all money spent on projects and on overhead expenses.
- We have mandatory training on timekeeping for all staff.

What RTI expects from you:

- Complete timesheets daily, and accurately report time spent on all activities—do not charge time spent on one project to a different project or project work to an overhead activity.
- Use your time wisely while at work to provide the most benefit to RTI, our clients, and those who benefit from our work.
- Ensure you have the requisite authorization from RTI management before issuing any requisition, entering into any contractual relationship, or making any other representation on RTI's behalf.
- Choose suppliers who provide the best value to RTI for the lowest price.
- Use sound judgment when arranging travel and when spending RTI's or our clients' money for business travel.
- Complete expense reports promptly and honestly.
- Know what expenses are contractually permissible before incurring them.

Data Privacy

RTI is dedicated to ensuring the security and privacy of the personal information that we process and also to providing a compliant and consistent approach to data privacy. RTI is committed to maintaining a data protection program that complies with existing law and abides by accepted data protection principles, including personally identifiable information laws, GDPR, the U.S. Privacy Act of 1974, and FERPA. Employees should be aware that because RTI is a global nonprofit organization, these laws may apply to proposals, contracts, subcontracts, employee data, vendors, external-facing websites, email marketing, and many other areas worldwide—not just in the United States or European Union.⁸

What you can expect from RTI:

- We follow a data protection regimen that is effective and fit for its purpose and that also demonstrates an understanding of—and appreciation for—regulations, laws, and accepted data protection principles.
- We supply clear information on how we process Personal Data and how and when we dispose of those data once they are no longer required.
- We provide training on the handling of Personal Data.
- We have a Privacy Officer whose responsibility is to inform and advise RTI and our staff on our data protection obligations and to monitor compliance with those obligations and RTI policy.
- We have adequate controls and protection available for the transmission, storage, and access of personal and other sensitive data.

⁷ RTI Policy References: 2.1 Time Reporting; 13.1 Institute Procurement; 15.1 Business Travel, Safety, and Reimbursable Expenses.

⁸ RTI Policy Reference: 12.5 Data Protection Policy.

What RTI expects from you:

- Be familiar with, understand, and comply with RTI's Data Protection Policy when processing Personal Data on RTI's behalf.
- Contact the RTI Privacy Officer for questions regarding GDPR or any other data protection and privacy compliance. GDPR may apply to proposals, contracts, subcontracts, employee data, vendors, external-facing websites, email marketing, and many other areas.

Acceptable Use

RTI's research and administrative operations require resources to electronically communicate, share information, and process data. Although access to RTI systems and the Internet is an essential part of day-to-day operations, RTI's systems and data must be kept in a secure manner and handled responsibly. Therefore, information security is the responsibility of all RTI staff.⁹

What you can expect from RTI:

- We follow policies, procedures, and standards to maintain the security of all Data and Resources.
- We provide security awareness training.
- We actively monitor for information security threats.

What RTI expects from you:

- Use only RTI systems to conduct RTI business, unless otherwise required by contract (to work on a client's systems).
- Access RTI systems in a responsible manner.
- Do not store, display, or disseminate unlawful communications of any kind.
- Do not access or disseminate pornography unless such use is specific to work-related functions and has been approved by the Office of Compliance or the Office of Corporate Counsel. This applies to any electronic communication residing on, distributed, or sent using GTS resources, including to other networks while using GTS resources.
- Do not allow non-employees to access GTS resources, unless access has been authorized by GTS and designated senior management approvers.
- Do not use RTI resources to violate copyright, patent, trademark, or other intellectual property rights, to include engaging in unauthorized copying, distributing, altering, or translating of copyrighted materials, software, or other media without the express permission of the copyright holder or as otherwise allowed by law. This includes watching, transferring, or downloading music or videos.
- Review annually the requirements in RTI Policy 14.0 Information Technology, and its sub-policies, including Policy 14.1.3 Acceptable Use.

Communicating with Integrity

In an ever-changing world with new communication tools being created and technology being used as a primary tool for socializing, RTI recognizes and encourages open exchanges of professional knowledge and information about our research, expertise, people, and mission. Employees should be aware that as a 501(c)(3) nonprofit corporation, RTI is subject to restrictions on certain political activity imposed by federal law, including the kinds and amount of lobbying or communication that RTI employees may engage in.¹⁰

⁹ RTI Policy References: 14.1 Network and Computing Services; 14.1.3 Acceptable Use.

¹⁰ RTI Policy References: 1.12 Public Statements and Commentary by RTI International Employees; 1.28 Use of Social Media; 1.33 Political and Government Relations Activities.

What you can expect from RTI:

- RTI internal social media sites will not be used for making discriminatory, harassing, or threatening remarks concerning employees, clients, or potential clients of RTI, nor will we permit any posting that is obscene, vulgar, profane, threatening, harassing, abusive, or hateful.

What RTI expects from you:

- When making expressions of personal opinions in any forum, care must be taken to ensure that such opinions are not attributed to RTI and are not misunderstood as a criticism of our clients.
- Do not use RTI time, titles, or business property to express personal opinions.
- Contact RTI's Office of Government Relations prior to engaging in communications with any elected federal, state, or local government official or any candidate for a federal, state, or local government office.
- When using social media, you are personally responsible for the information you share, even on a personal site (including, for example, a personal Facebook page) and are expected to use good judgment and conduct yourself professionally at all times in accordance with the Code and RTI's policies and procedures.
- Do not participate in any political campaign supporting or opposing a candidate for public office on behalf of RTI.
- If asked to express professional opinions in the media, keep your opinions separate from RTI's official statements. Identifying yourself as an RTI employee may be appropriate in some specific instances, but you must discuss all such expressions in advance with RTI's Office of Corporate Communications.

Maintaining Quality

Perform with Excellence

Since our founding in 1958, RTI has had a reputation for excellence, which has been a fundamental part of our mission and vision. We take seriously the trust placed in us to perform our research and technical services with excellence. RTI's policy is to provide superior quality research, development, and technical services that meet the highest standards of professional performance and scientific integrity. All of us at RTI must continually challenge ourselves to find the best solutions in all areas of our work.¹¹

What you can expect from RTI:

- We conduct scientific research independently and as objectively as possible.
- We conduct projects in compliance with applicable regulations and guidelines, applying quality assurance practices commensurate with project scope and risk.
- We offer training and educational opportunities for staff on quality management.
- RTI will not support conclusions that cannot be supported by available data.
- We give people credit for their work when they have a right to receive credit and only when they deserve to receive credit, according to accepted standards of authorship.
- We respect the intellectual property of others.

What RTI expects from you:

- Adhere to quality requirements and conduct work with integrity and ethical behavior.
- Be alert to, and deal effectively with, instances in which unethical research behavior is suspected.
- Interact honestly with all groups interested in our research (e.g., other employees, coinvestigators, clients,

¹¹ RTI Quality Manual; Policy 1.3 Research Integrity.

community groups) and maintain open, sensitive, and truthful communications about research and findings.

- Do not make up (fabricate), misrepresent (falsify), or copy or steal (plagiarize) data, information, methodology, results, or the interpretation of results.
- Report conduct that you believe in good faith constitutes research misconduct to RTI's Research Integrity Officer or the RTI Ethics Office.
- Use other people's intellectual property only when you have proper rights or permissions.

Act with Accountability

RTI is accountable to our clients and one another to comply with all legal and regulatory requirements applicable to our work. As a federal contractor, we must also abide by rules developed to help contractors and federal employees avoid ethical misconduct or the appearance of ethical misconduct and to ensure integrity in the performance of government-funded contracts.¹²

What you can expect from RTI:

- We adhere to the Mandatory Disclosure Rule, which requires RTI to provide appropriate notices if we have credible evidence of a violation of federal criminal law involving fraud, conflicts of interest, bribery or gratuities, or a violation of the U.S. False Claims Act.
- We have a zero-tolerance policy for bribery, kickbacks, or other transactions and business dealings in violation of anti-corruption laws (e.g., the U.S. Foreign Corrupt Practices Act, the U.K. Bribery Act 2010, or similar local laws) in all countries in which RTI operates.
- RTI will not participate in anti-competitive discussions with our competitors to try to fix prices or manipulate the marketplace to get an unfair advantage in violation of antitrust laws.
- RTI will conduct reasonable due diligence on the end users of our goods and services and will not knowingly employ an individual or enter into a contract with a company if the individual or company is on the General Services Administration's Consolidated List of Debarred, Suspended, and Ineligible Contractors or is identified on the Office of Foreign Assets Control's Specifically Designated Nationals and Blocked Persons List.
- We comply with trade laws and regulations.

What RTI expects from you:

- Be alert and proactive in adhering to RTI's policy to maintain our values of honesty and integrity in all dealings by ensuring no false claims or statements are made.
- Do not engage in agreements or discussions with anyone seeking RTI's cooperation to boycott or refuse to do business with specific persons, groups, or countries. If this occurs, disclose those discussions to the RTI Office of Corporate Counsel.
- Do not seek or receive information about potential government or commercial business that RTI is not authorized to have (including, for example, nonpublic procurement information or information regarding an RTI competitor). If you receive any such information, contact RTI's Ethics Office to discuss the appropriate next steps.
- Do not use nonpublic information about RTI, our customers, our suppliers, or our collaborators for personal profit, including to trade, buy, or sell stock or other securities. Doing so is a violation of the Code and insider trading laws.
- Never provide anything of value to, or receive anything of value from, any person who could cause the integrity of the procurement process to be questioned.

¹² RTI Policy References: 1.4.2 Gifts and Entertainment; 1.19 International Trade Compliance: Licensing & Control; 1.24 Foreign Corrupt Practices Act—Due Diligence and Compliance; 3.6 Compliance with Anti-Boycott Laws; 13.1.1 Procurement Integrity Obligations; 13.2.1 Supplier Identification and Selection.

- Do not make a payment or offer anything of value (directly or indirectly through an agent or other intermediary) to a foreign government official, party official, or political candidate to try to influence the official or his or her government to act in a way that provides an advantage to a person or group.
- Do not offer anything to government officials or accept anything from government officials if it is worth more than a minor value.
- Contact RTI's Ethics Office to receive written approval prior to approaching a current or former government employee "of any government worldwide" about working as an RTI employee or consultant.
- Be familiar with applicable export control policies, regulations, and laws before exporting (including sharing technical data with a foreign national, even if the individual is in the United States) any items or hosting foreign visitors. Direct any questions to the International Trade Compliance Officer or the Vice President of Corporate Compliance.

Resources

Glossary

Data or Information Assets—Any electronic information that can be stored or transmitted.

Export—The actual shipment of a commodity out of the United States as well as any transfer of U.S. information—including software source code, technical data, and services—from a U.S. person to a non-U.S. person anywhere in the world. Exports of technical data to non-U.S. persons may occur in the United States or elsewhere and may be visual, oral, or in writing.

Intellectual Property—All ideas, discoveries, inventions, information, data, works of authorship, and other intellectual creations of any type or character whatsoever, including concepts, improvement (whether patentable or not), technical information, trade secrets, developments, know-how, methods, techniques, formulas, processes, computer programs, software, databases, and other electronic technologies.

Network—A collection of both physical and logical assets that facilitates access to data by users.

Personal Data—Data (inclusive of all information assets) about various individuals, including research participants, data subjects, staff (including contractors and interns), applicants, customers, suppliers, and other third parties.

Resources—Item used to conduct business on behalf of RTI; examples include data, network, computing equipment, software, and telephones.

Significant Financial Interest—Any stock holdings in privately held companies or an equity or a debt interest in a publicly traded company that—when aggregated for the employee, spouse, and dependent children—exceed (s) \$10,000 or 1% of the company's outstanding securities/capital value of the business entity, whichever is greater, as determined through reference to public prices or other reasonable measures of fair market value.

Contact Us

We perform with the highest ethical standards of individual and group honesty. We communicate openly and realistically with each other and our clients. Upholding this value is a shared responsibility.

If you suspect fraud or any other activity that might violate the RTI Code of Conduct, report it to the RTI Ethics Office.

Talk to your supervisor, your Human Resources Business Partner, or RTI's Ethics Officer to ask for guidance about any of the issues covered in the Code. To request more information about the Code or to report a possible violation of the Code, contact the Ethics Officer. The Ethics Officer serves as an advisor and resource for employees who have questions or concerns about ethical conduct and directs investigations, if needed.

If you suspect fraud or any other activity that might violate the RTI Code of Conduct, report it to the RTI Ethics Office.

Email ethics@rti.org

Call 919.541.7070

Anonymously 877.212.7220
(toll-free/no charge)

Acknowledgments

To begin working at RTI and to continue working at RTI, every employee must read and acknowledge annually that he or she will comply with RTI International's Code of Conduct. This annual acknowledgment ensures that all employees carry out their work in compliance with our shared values. Employees have two ways (online or paper

You can access the Ethics Helpline through the following numbers:			
From headquarters or from North Carolina:	919 541.7070 (local call)	From Canada, the United States, or Mexico:	877 212.7220 (toll-free/no charge)
From RTI regional offices in countries other than Canada, the United States, or Mexico:			
1. Dial the appropriate AT&T access number:			
China		Indonesia	001-801-10
North, Beijing CNCG	108-888	Kenya	0-207-602-020
North, Beijing CNCG (Mandarin)	108-888	Malaysia	1-800-80-0011
PRC – South	108-710	Spain	900-99-0011
Shanghai (China Telecom)	108-11	Sweden	020-799-111
El Salvador	800-1785	United Arab Emirates	8000-021
France	0-800-99-0011	United Kingdom (Manchester)	0-800-013-0011
India	000-117		
2. Wait for the recorded message, "Thank you for using AT&T. Please dial the number you are calling."		From countries without AT&T access numbers (e.g., Kenya):	
3. Dial 877 212.7220 (toll-free/no charge). Note: If you do not wait to hear the recorded message, the call will not be connected. If you wait too long, an AT&T operator will ask you to provide a credit card or calling card and personal identification number. If this happens, please hang up and try again.		1. Dial the USA direct access number for the country from which you are calling.	
		2. Dial 877 212.7220 (the operator may ask for a calling card number)	

form) to sign a Code of Conduct Acknowledgment Form.

Online

If you have access to the Internet and RTI International's Insider site, you must sign your Acknowledgment Form online. Employees with Internet and Insider access will receive an email request every year to renew their Code of Conduct acknowledgment. This email will contain a direct link to the login page of the Acknowledgment Form.

Code of Conduct Home Page

Paper

If you do not have access to RTI International's Insider site on your computer, you must request a copy of RTI's Code of Conduct Acknowledgment Form from your supervisor or the RTI Ethics Officer. You must fax the completed form to the RTI Ethics Office at 919.541.6624. Please see the next page for an example of the paper form.

Code of Conduct Acknowledgment

To begin working at RTI and to continue working at RTI, every RTI employee must read and acknowledge annually that he or she will comply with RTI's Code of Conduct. This annual acknowledgment ensures that all employees carry out their work in compliance with our shared values. The acknowledgment can be made either via Insider or on a paper form.

Acknowledgment by Employee

I acknowledge that I have personally reviewed RTI International's Code of Conduct and agree to comply with its values, principles, and standards of professional conduct. I understand that the examples provided within this document do not attempt to cover every situation that may arise during the course of my employment. I also understand that it is my responsibility to seek guidance if I have questions about the Code or about a specific situation. Because RTI's policies and procedures are subject to change or modification at any time, with or without notice, I further understand that I must consult RTI's policies and procedures, where applicable, and that they will take precedence in the event they conflict with or are inconsistent with this Code of Conduct. I also understand that the Code is not intended to, nor does it, create a contract of employment between RTI and myself, nor does it guarantee that my employment with RTI will

continue as long as I comply with its provisions. Finally, I understand that I must report any suspected violations of the Code and cooperate with investigations if requested to do so.

Employee's Signature

Employee's Name (Printed)

Location (City, State/Province, Country)

Today's Date