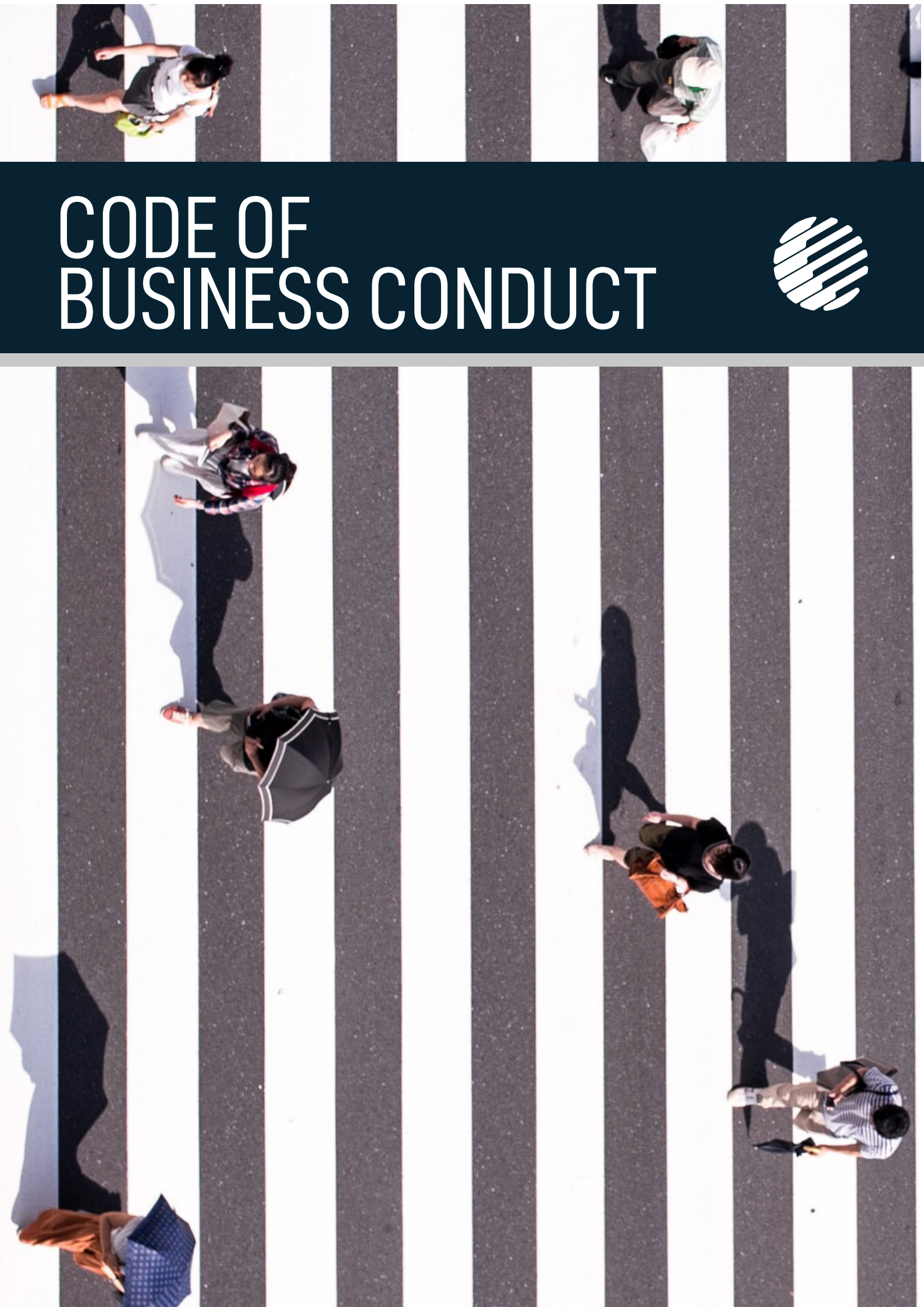


CODE OF BUSINESS CONDUCT





1. INTRODUCTION

Global Regulatory Partners (GRP) Code of Conduct is built around the recognition that everything we do in connection with our work will be, and should be, measured against the highest possible standards of ethical business of conduct. Our commitment to the highest standards helps us hire great people, provide outstanding services, and attract loyal clients. Trust and mutual respect among employees and clients are the foundation of our success, and they are something we need to earn every day. So please do read the Code, and follow both its spirit and letter, always bearing in mind that each of us has a personal responsibility to incorporate, and to encourage other GRP members to incorporate the principles of the Code into our work.

2. WHO MUST FOLLOW OUR CODE?

We expect all of our employees to know and follow the Code. Failure to do so can result in disciplinary action, including termination of employment. Moreover, while the Code is specifically written for GRP employees, we expect GRP contractors, consultants, and others who perform work or services for GRP to follow the Code relating to their work for us. Failure of a GRP contractor, consultant, or other covered service provider to follow the Code can result in termination of their relationship with GRP.

3. WHAT IF I HAVE A CODE-RELATED QUESTION OR CONCERN?

If you have a question or concern. You can contact your manager, also submit a question or raise a concern of a suspected violation of our Code or any other GRP policy. Finally, if you believe a violation of law has occurred, you can always raise that through management or with the appropriate government agency.

4. NO RETALIATION

GRP prohibits retaliation against any worker at GRP who reports or participates in an investigation of a possible violation of our Code, policies, or the law. If you believe you are being retaliated against, please contact management.

5. SERVE OUR CLIENTS

Our clients value GRP not only because we deliver great services, but because we hold ourselves to a higher standard in how we treat clients and operate. Keeping the following principles in mind will help us to maintain that high standard:

5.1 Integrity

Our reputation as a company that our clients can trust is our most valuable asset, and it is up to all of us to make sure that we continually earn that trust. All our communications and other interactions with our clients should increase their trust in us.

5.2 Usefulness

Our products, features, and services should make GRP more useful for all our clients. We have many



different types of clients, from individuals to large businesses, but one guiding principle: "Is what we are offering useful?"

5.3 Privacy & Security

Always remember that we are asking clients to trust us with their confidential information. Preserving that trust requires that each of us respect and protect the privacy and security of that information. Our security procedures strictly limit access to and use of clients' information, and require that each of us take measures to protect client data from unauthorized access.

5.4 Responsiveness

Part of being useful and honest is being responsive: We recognize relevant feedback when we see it, and we do something about it. We take pride in responding proactively to communications from our clients, whether questions, problems or compliments.

5.5 Take Action

Any time you feel our clients aren't being well-served, don't be bashful - let someone in the company know about it. Continually improving our products and services takes all of us, and we're proud that GRP employees champion our clients and take the initiative to step forward when the interests of our clients are at stake.

6. SUPPORT EACH OTHER

We are committed to a supportive work environment, where employees have the opportunity to reach their full potential. GRP employees are expected to do their utmost to create a workplace culture that is free of harassment, intimidation, bias, and unlawful discrimination.

6.1 Equal Opportunity Employment

Employment here is based solely upon individual merit and qualifications directly related to professional competence. We strictly prohibit unlawful discrimination or harassment on the basis of race, color, religion, veteran status, national origin, ancestry, pregnancy status, sex, gender identity or expression, age, marital status, mental or physical disability, medical condition, sexual orientation, or any other characteristics protected by law. We also make all reasonable accommodations to meet our obligations under laws protecting the rights of the disabled.

6.2 Harassment, Discrimination, and Bullying

GRP prohibits discrimination, harassment and bullying in any form – verbal, physical, or visual. If you believe you've been bullied or harassed by anyone at GRP, or by a GRP partner or vendor, we strongly encourage you to immediately report the incident to management. Similarly, managers who learn of any such incident should immediately report it to senior management. Management will promptly and thoroughly investigate any complaints and take appropriate action.



6.3 Drugs and Alcohol

Our position on substance abuse is simple: It is incompatible with the health and safety of our employees, and we don't permit it. Consumption of alcohol is not banned at our offices, but use good judgment and never drink in a way that leads to impaired performance or inappropriate behavior, endangers the safety of others, or violates the law. Illegal drugs in our offices or at sponsored events are strictly prohibited. If a manager has reasonable suspicion to believe that an employee's use of drugs and/or alcohol may adversely affect the employee's job performance or the safety of the employee or others in the workplace, the manager may request an alcohol and/or drug screening. A reasonable suspicion may be based on objective symptoms such as the employee's appearance, behavior or speech.

6.4 Safe Workplace

We are committed to a violence-free work environment, and we will not tolerate any level of violence or the threat of violence in the workplace. Under no circumstances should anyone bring a weapon to work.

7. AVOID CONFLICTS OF INTEREST

When you are in a situation which competing loyalties may cause you to pursue a personal benefit for you, friends, or family at the expense of GRP or our clients, you may be faced with a conflict of interest. All of us should avoid conflicts of interest and circumstances that reasonably present the appearance of a conflict.

8. PRESERVE CONFIDENTIALITY

Certain kinds of company information, if leaked, can hurt, eliminate our competitive advantage and prove costly in other ways. Our responsibilities extend beyond not revealing Confidential GRP material – we must also: properly secure, label, and (when appropriate) dispose of Confidential GRP material; safeguard Confidential information that GRP receives from others under non-disclosure agreements; take steps to keep our trade secrets and other confidential intellectual property secret and safe.

8.1 Confidential Information

Make sure that information that is classified as "Confidential" is handled in accordance with GRP's SOP Confidential Information. At times, a project or negotiation may require disclosure of "Need to Know" or Confidential information to an outside party: Disclosure of that information should be on an "as only needed" basis and only under a non-disclosure agreement.

8.2 Outside Communications

GRP is extremely careful about disclosing confidential proprietary information. Consistent with that, you should ensure your outside communications (including online and social media posts) do not disclose confidential proprietary information or represent (or otherwise give the impression) that you are speaking on behalf of GRP unless you're authorized to do so by the Company.



9. COMPANY EQUIPMENT

GRP provides tools and equipment needed to do our jobs effectively. GRP counts on you to be responsible and not wasteful with GRP property. Company funds, equipment, and other physical assets are not to be requisitioned for personal use.

Anything you do using GRP's corporate electronic facilities (e.g., computers, mobile devices, network, etc.) or store on GRP's premises (e.g., letters, memos, and other documents) may be disclosed to people inside and outside the company. For example, GRP may be required by law (e.g., in response to a subpoena or warrant) to monitor, access, and disclose the contents of corporate email, voicemail, computer files, and other materials on our electronic facilities or on our premises. In addition, the company may monitor, access, and disclose employee communications and other information on our corporate electronic facilities or on our premises where there is a business need to do so, such as protecting employees and clients, maintaining the security of resources and property, or investigating suspected employee misconduct.

10. ENSURE FINANCIAL INTEGRITY AND RESPONSIBILITY

Financial integrity and fiscal responsibility are core aspects of corporate professionalism. This is more than accurate reporting of our financials, though that's certainly important. The money we spend on behalf of GRP is not ours; it's the company's. Each person at GRP- not just those in Finance – has a role in making sure that money is appropriately spent, our financial records are complete and accurate, and internal controls are honored. This matters every time we hire a new vendor, expense something to GRP, sign a new business contract, or enter into any deals on GRP's behalf. A core GRP value has always been to spend money wisely. When you submit an expense for reimbursement or spend money on GRP's behalf, make sure that the cost is reasonable, directly related to company business, and supported by appropriate documentation.

11. OBEY THE LAW

GRP takes its responsibilities to comply with laws and regulations very seriously and each of us is expected to comply with applicable legal requirements and prohibitions. While it's impossible for anyone to know all aspects of every applicable law, you should understand the major laws and regulations that apply to your work. A few specific laws are easy to violate unintentionally and so are worth pointing out here below.

11.1 Anti-bribery Laws

Like all businesses, GRP is subject to lots of laws, both U.S. and non-U.S., that prohibit bribery in virtually every kind of commercial setting. The rule for us at GRP is simple – don't bribe anybody, anytime, for any reason.

11.2 Non-government relationships

You should be careful when you give gifts and pay for meals, entertainment, or other business courtesies on behalf of GRP. We want to avoid the possibility that the gift, entertainment, or other business courtesy could be perceived as a bribe, so it's always best to provide such business courtesies infrequently and, when we do, to keep their value moderate.



11.3 Dealing with government officials

Offering gifts, entertainment, or other business courtesies that could be perceived as bribes becomes especially problematic if you're dealing with a government official. "Government officials" include any government employee; candidate for public office; or employee of government-owned or -controlled companies, public international organizations, or political parties. Several laws around the world, including the U.S. Foreign Corrupt Practices Act and the UK Bribery Act, specifically prohibit offering or giving anything of value to government officials to influence official action or to secure an improper advantage.

12. CONCLUSION

GRP aspires to be a different kind of company. It's impossible to spell out every possible ethical scenario we might face. Instead, we rely on one another's good judgment to uphold a high standard of integrity for ourselves and our company. We expect all GRP members to be guided by both the letter and the spirit of this Code. Sometimes, identifying the right thing to do isn't an easy call. If you aren't sure, don't be afraid to ask questions of your manager.





1.0 PURPOSE AND SCOPE

As a global consulting company, Global Regulatory Partners must comply with the anti-bribery and corruption laws and regulations of every country in which Global Regulatory Partners operates, including the U.S. Foreign Corrupt Practices Act ("FCPA") and the UK Bribery Act. These standards are minimum standards that apply to all company management, employees and contractors.

2.0 ANTI-BRIBERY & CORRUPTION POLICY

This Policy was created to state Global Regulatory Partners' zero tolerance approach to bribery and to provide direction to assist in the prevention of bribery and corruption. No officer, employee, agent, joint venture partner, contractor or consultant who work for Global Regulatory Partners may pay, offer or promise to pay, or authorize payment of money, money equivalent, gifts or anything else of value, in any amount, to any person or company whether a public official or private person or company, in order to secure improper performance of duties or functions or, in the case of a public official, with any intention to gain influence for a business advantage in the performance of official functions. A public official is defined as all elected or appointed officials, candidates for political office, consultants with government-owned or controlled companies, officials in political parties or anyone acting on behalf of a public international organization (such as the United Nations).

No officer, employee, joint venture partner, agent, contractor or consultant working for Global Regulatory Partners may receive or solicit to receive payment of money, money equivalent, gifts or anything else of value, in any amount, from any person or company in connection with the performance of services on behalf of Global Regulatory Partners other than the contractually established fee for services rendered and legitimate expenses to be reimbursed in connection with the performance of such services.

2.1 Working with Third Parties

Global Regulatory Partners can be held liable for the actions of third parties who act as intermediaries for and on its behalf in business dealings with customers, government agencies or others. Third Party Intermediaries ("TPIs") are those who are, or are likely to be viewed as, representatives of Global Regulatory Partners.

As Global Regulatory Partners is accountable for TPI's behavior, including accepting or giving bribes, the company therefore must make efforts to prevent TPIs from participating in bribery or other corrupt conduct. Any TPI that does business on Global Regulatory Partners' behalf must conduct business with high level of integrity and should carry out business fairly, honestly, and openly. Global Regulatory Partners will only do business with a TPI who certifies it will act without bribery or other corruption.

2.2 Facilitation Payments

It is Global Regulatory Partners policy not to pay facilitation payments. Facilitation payments are small payments made to low level government officials in order to expedite or secure performance of routine governmental actions over which the official has no discretion, such as permits, licenses, work orders, shipment or inspection.



2.3 Gifts & Entertainment and Reimbursement of Travel

Every Global Regulatory Partners Employee, must comply with the company's Gifts and Entertainment Policy as described in its Standards of Business Conduct.

2.4 Promotions and Marketing

Certain marketing and promotional expenses involving public or private officials may be allowed with appropriate approvals. If public officials will be involved in the receipt of gifts, entertainment or expense reimbursement as part of a promotional activity, you must obtain appropriate approvals from Global Regulatory Partners senior management. Any approved expenses must be paid by Global Regulatory Partners directly to the provider whenever possible, should be directly related to the promotion of Global Regulatory Partners or its services and must be carefully documented. Please refer to the company Standards of Business Conduct for further guidance.

3.0 ASKING QUESTIONS AND & REPORTING INCIDENTS OR CONCERNS

Every Global Regulatory Partners employee, contractor or consultant is encouraged to ask questions regarding this Policy. Every employee contractor or consultant must promptly report any bribe, solicitation or offer of an improper payment or advantage. You may ask questions or make a report to a manager or send an email to Human Resources Department at ethics@globalregulatorypartners.com. Received calls and information will be treated in a confidential manner within the limits of the law.

4.0 CONSEQUENCES OF POLICY VIOLATION

Global Regulatory Partners takes bribery and corruption very seriously. Any employee, contractor or consultant found to be in violation of this Policy will be subject to disciplinary action, up to and including termination of employment. Third parties found in violation of this Policy may be subject to termination of the business relationship with Global Regulatory Partners, as well as any other legal rights and remedial actions available to Global Regulatory Partners.



- The pandemic plan (enter administrator) the (enter name/title of company president), along with the affected employee and his/her supervisor, determine whether to cancel any planned business travel.
- If so, the pandemic plan (enter administrator) notifies the (enter name of travel agency) to cancel
- The pandemic plan (enter administrator) the (enter name/title of company president) along with the affected supervisors, determine whether to block all travel to the destination.
- If so, the pandemic plan (enter administrator) notifies (enter name of travel agency) to block all bookings to the destination
- The pandemic plan (enter administrator) notifies affected employees of the change
- Responsible person notifies pandemic plan (enter administrator) and the (title of company president) when travel advisory to the destination has been lifted
- The pandemic plan (enter administrator) and the (title of company president) determine whether to open bookings to the destination.
- If so, the pandemic plan (neater administrator) notifies (enter travel agency) to open bookings to the destination and notifies affected employees of the change.
- If responsible person detects a travel for off site locations listed:
- Responsible person then communicates the detection to applicable employees, the pandemic plan (enter administrator) and the (title of the company president) by (enter method of communication)
- The pandemic plan (enter administrator) the (title of company president) along with the affected employee and his/her supervisor determine whether to evacuate the employee and his/her family
- If so, the pandemic plan (enter administrator) notifies the employee to evacuate with his/her family, to take certain exposure control measures, to watch for symptoms, to seek medical advice if symptoms appear, and to notify pandemic plan (enter administrator) by telephone upon his/her return.
- During the employees' return call, the pandemic plan (enter administrator) shall inform him/her to stay home until further notice, to watch for symptoms, and to seek medical advice if symptoms appear.
- Once the incubation period has passed, the pandemic plan (enter administration) will contact the person to see if symptoms appeared
- If so, the medical surveillance procedure is activated
- If not the pandemic plan (enter administrator) may instruct the person to report to work
- Responsible person notifies the pandemic plan (title of company president) along with affected employees and his/her supervisors determine whether to send employees back to the off-site location
- If so, the pandemic plan (enter administrator) notifies affected employees of the change.

4.10 Symptoms

- Responsible person will ensure that :
 - ✓ Supervisors know the signs and symptoms of pandemic and the latest procedures for handling a potential infected or infected employee. These procedures are communicated by (describe what method will be used to inform supervisor)
 - ✓ Employees know the signs and symptoms of the pandemic virus. This information is communicated by (describe what method will be used to inform employees)
- All employees must abide by the following procedure during the pandemic containment stage and (responsible person) will update the following procedure if necessary:
- If a person is sick at home just before his/her shift, comes ill at work, or another person detects that a person has signs and symptoms of the pandemic virus the person must call the responsible person by telephone (enter phone number)
- Responsible person will ask the ill person questions to see if he/she has symptoms of the pandemic virus



- If the ill person is determined to not currently have any symptoms of a pandemic virus, responsible person will inform the person of this fact and instruct the ill person to call again or contact a physician if he/she is still concerned
- The ill person may then contact his/her supervisor to notify him/her that the ill person is staying or going home for personal illness that is not a pandemic virus
- If the ill person is determined to have symptoms of the pandemic virus, responsible person will:
 - ✓ Record the case as a "suspect" for tracking purposes
 - ✓ Ask the ill person which coworkers he/she has had face to face contact with for the last (enter number) days
 - ✓ Instruct the ill person to obtain and wear a respirator, go home immediately, not to use public transportation if possible and contact physician by phone or Instruct the ill person that he/she will not be able to return until a physician has declared him/her well and (responsible person) gives the ill person permission to return.
 - ✓ Notify recent contacts that a person's supervisor that the ill person has gone home sick
 - ✓ Notify recent contacts that a person suspected of having the pandemic virus may have infected them, that they must go home, and that they may not return until further notice
 - ✓ Notify the cleaning crew to disinfect the ill's person recent contacts work surfaces
 - ✓ Contact the ill person (enter frequency) to see if a physician has declared him/her well
 - ✓ If so, responsible person may instruct the formerly ill person to report to work
 - ✓ If not, (enter frequency) until a physician has declared him/her well
 - ✓ Contact the recent contacts to see if they have symptoms of the pandemic virus
 - ✓ If so, responsible person will instruct them to contact a physician by phone
 - ✓ Responsible person will then contact the recent contacts (enter frequency) to see if a physician has declared them well
- If so, responsible person may instruct the recent contacts (enter frequency) until a physician has declared them well
- If not, and the incubation period has passed, then (responsible person) may instruct the recent contacts to return
- Once a formerly ill person or recent returns to work, he/she must complete a (enter name of your sick leave or time off form) and submit it to (responsible person) for tracking purposes

4.11 Sick leave and time off

- During a "declared" pandemic containment period, employees are eligible for:
- Paid leave due to a community quarantine
- Paid sick leave, under the following conditions (list conditions)
- Paid time off to care for sick family members or children whose school or daycare has closed. Employees may also use next year's vacation days during the immediate year for time off to care for sick family members.
- Flexible time off days, under the following conditions (list condition)
- Family medical leave act benefits
- Overtime pay, in accordance with the law, for all overtime hours worked
- Flexible work hours under the following conditions (list conditions)

4.12 Stress management

- Fear, stress, frustration, anxiety and loss are to be expected during a pandemic outbreak
- Rumors and misinformation may abound. This may cause increased absenteeism, distress and lowered productivity.



- For these reasons, , the responsible person will ensure the following measures in hopes that stress will be reduced and or eliminated
- Employees are informed of the status of the pandemic and the contents of our pandemic plan
- Employees are informed of necessary changes well ahead of time
- Employees are informed what the company is doing about the current situations
- An employee assistance program is available
- Employees are informed of the location and counseling capabilities of the company's employee assistance program
- Employees are encouraged to stay home when they are sick
- Employees are informed of the more lenient sick leave, time off, and compensation policies implemented during the pandemic containment period
- Responsible person ,contact address/phone number, and backups will be available to answer questions about our plan, the status of the pandemic, the status of the company, changes, what company is doing, sick leave, time off, and compensation policies.

4.13 Protecting people and assets

- To protect the company, property and employees, certain security measures will be in place during a pandemic outbreak (describe security measures Physical security might include guards at the site, police assistance, security entry cards, communication line security, locks, cameras, intrusion alarms or signals, identification badges, reception desk, restricted area signs, and sign-in/sign-out sheets. Information security might include passwords, security software, key locks, identification readers, network security, encryption devices, voice scrambling, and automatic callback procedures. Consider people security. Consider criminal background checks of alternative suppliers and service vendors and those installing or maintaining equipment for telecommuters. Don't forget about in-transit security. See **49 CFR 172.800 to .804** regarding security plan requirements for those who transport hazardous materials.)

4.14 Coordination and collaboration with outside entities

- The pandemic plan (enter administrator) will coordinate/collaborate with the following outside entities before and during a pandemic (Collaborate with insurers, health plans, major local healthcare facilities, public health agencies, and emergency responders to share your plans, understand capabilities, and discuss how your company could contribute to the community. Share best practices with community businesses, chambers of commerce, and associations.):
 - ✓ Outside entity
 - ✓ Address
 - ✓ Phone/fax
 - ✓ Description

4.15 Returning to normal

- Once it appears that a wave of pandemic has passed, operations will return to "normal" in accordance with the following stages (stages involve the relaxing of restrictions and dropping of certain measures)
- Responsible person is responsible for determining when it is appropriate to move to each stage.
- Employees will be notified prior to shift in stage level, by (enter how employees will be notified)



4.16 Plan evaluation

- By having (responsible person) thoroughly evaluate and as necessary revise our plan, we ensure our plan's effectiveness and prevent or eliminate any problems
- Plan evaluation involves the following (describe what is involved in your plan evaluation i.e drills, tests, suits, legal reviews and other evaluation methods.
- Evaluation procedures should address the following: evaluation objectives, evaluation approach, required equipment and resources, necessary personnel, schedules and locations, specific evaluation procedures, and expected results and exit criteria. Assign responsibilities. Examine evaluation results for accuracy and consistency and note discrepancies.
- Update the Pandemic Plan based upon lessons learned.)

CEO and President:

Dr. Suzan Davis

Signature:

DocuSigned by:
Suzan Davis
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1/8/2021