



CODE OF CONDUCT

A Guide to Business, Ethical and Personal Conduct

Flatiron Health, Inc.

June 2023

A MESSAGE FROM OUR CEO



CAROLYN STARRETT

Flatiron is committed to ensuring that we comply with all applicable laws, rules and regulations where we do business. This includes acknowledging our obligation as a healthtech company to adhere to the highest standards of integrity and ethics.

Our Code of Conduct (the “Code”) describes standards and principles we’ve developed to promote understanding of, and adherence to, the ethical behaviors that we expect of every member of the Flatiron community. Our Code and the resources referenced within it should assist you in “doing the right thing” and making the right decisions whenever you are confronted with an ethical challenge. We also encourage dialogue among employees and their managers to discuss situations that may give rise to ethical questions.

Adopting the highest standards of integrity and ethics by adhering to the Code helps to advance our mission and reputation within the industry, particularly among the patients and clinicians who entrust us with their most sensitive information.

Thank you for your commitment and continued efforts to earn the trust and respect of our customers, partners, and especially the people with cancer we serve. Together, we will continue to make Flatiron a company we all are proud to be part of.

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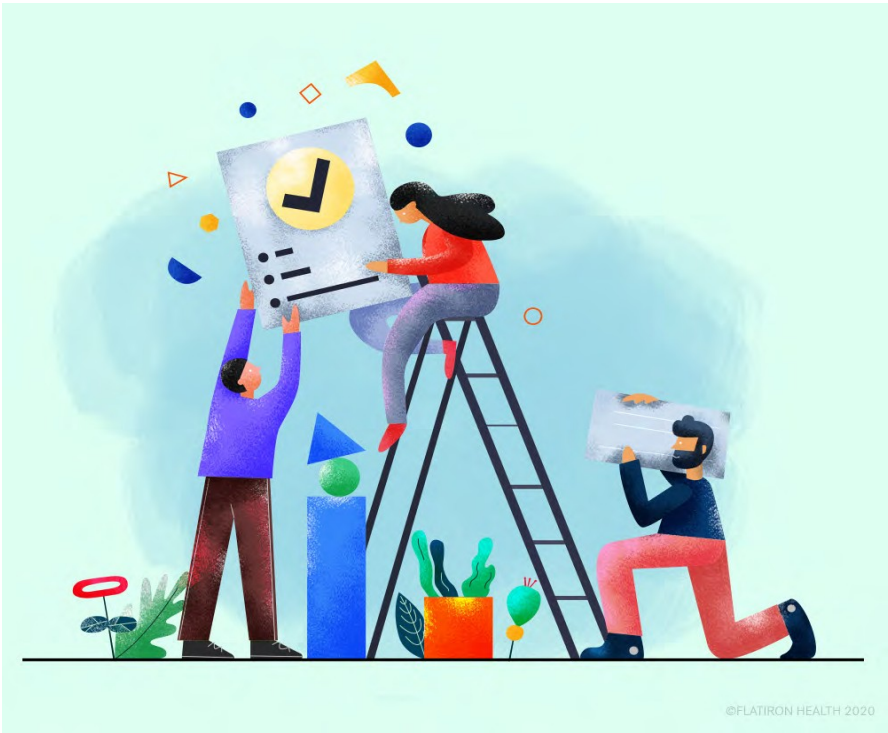
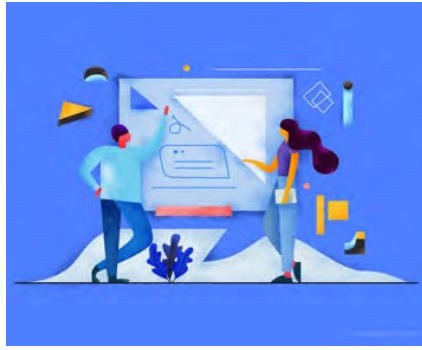
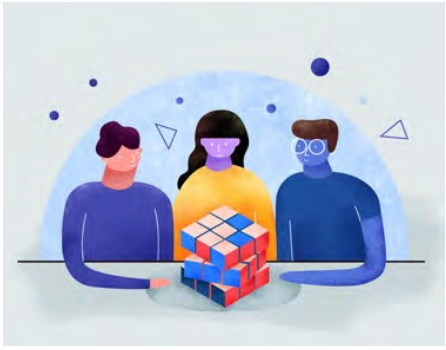
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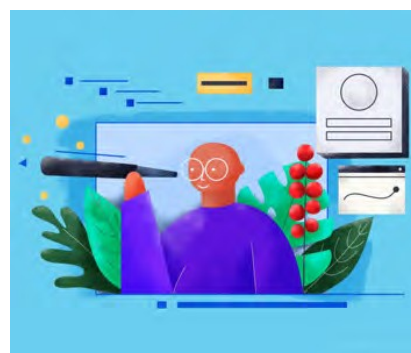
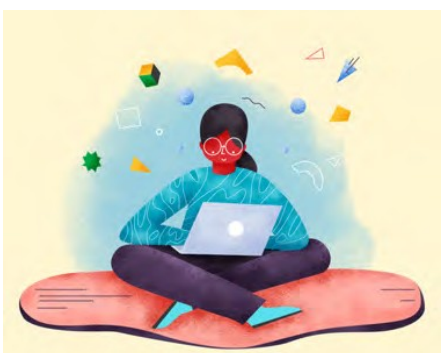
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Do the Right Thing



Flatiron Health Code of Conduct

Our Code of Conduct

Flatiron Health is a healthtech company dedicated to improving cancer treatment and advancing research. As the pioneer in real-world evidence for oncology, we provide technology and services to support patient care and make every person's story count. We are a diverse team of passionate, curious individuals from a wide range of backgrounds. Our mission is to improve and extend lives by learning from the experience of every person with cancer.

We respect the magnitude of our mission and live our core Flatiron value to [Do the right thing](#) by being responsible and behaving with integrity in all our interactions - with our clients, their patients and other stakeholders, with our co-workers and colleagues, and with our communities.

This Code of Conduct provides the foundation for the Flatiron Health Compliance Program, highlighting what [Do the right thing](#) means for those working on Flatiron's behalf. Our employees, officers and directors are expected to read, understand and comply with this Code, as well as all applicable Flatiron policies, and other laws and regulations that apply to the business. In addition, this Code is made available to all Flatiron contractors, consultants, third-party vendors and collaborators with the expectation that their actions reflect the principles set forth in this Code.

Doing what is right rests with you

You are instrumental in creating a culture of compliance and an inclusive environment for your colleagues. This Code and the policies and resources it references will assist you in making the right decisions.



When unsure what the right thing to do is, ask yourself the following:

- Is my behavior in line with Flatiron's Values and this Code of Conduct?
- Could the action adversely affect patient safety or the quality of our products?
- Could it have negative consequences for Flatiron or me?
- Would I be comfortable if it was reported in the news?

We want to hear your concerns

Speaking up is the right thing to do. Flatiron leaders need to be aware of compliance and integrity issues so that we can address them quickly. Help Flatiron succeed by speaking up if:

- You have a question about this Code or the policies it references
- You see a violation of this Code or have something else to report in good faith
- You have other concerns that may affect Flatiron's business
- It is the expectation of Flatiron that all reports are made in good faith. If it is determined that a report is made in bad faith, it will be addressed accordingly

Flatiron is known for its culture of openness to ask questions. We want you to feel comfortable approaching your supervisor or management with questions or if you suspect violations of policies or standards. Where communication to your manager is not appropriate, this Code lists other available resources.

Managers, you must be responsive. If you are a manager, officer or director, you demonstrate commitment to our high ethical standards by:

- Serving as a positive role model for others
- Creating an environment where employees are encouraged to ask questions and raise concerns without hesitation or fear
- Providing help and advice that those reporting to you need to comply with the Code of Conduct
- Promptly following up on any report of suspected violations of the law, this Code or other Flatiron policies.

Your resources

For questions regarding this Code or to report actual or suspected violations of the Code or Flatiron policies, you can reach out to:

- Your supervisor or management
- The Compliance Department
- compliance@flatiron.com
- Any representative from Flatiron's Compliance team
- Any representative from Flatiron's Legal team
- Any HR Business Partner

You may also ask for guidance or report concerns by phone or online through Flatiron's Compliance & Ethics Line which is maintained by an independent company EthicsPoint:

1-844-302-0429 [United States]

0800 1821050 [Germany]

0800-100-1274 [Japan]

0800 949 6476 [UK]

flatiron.ethicspoint.com

If desired, information will be sent to Flatiron by EthicsPoint on a completely confidential and anonymous basis.

We do not tolerate retaliation

Flatiron does not tolerate any intimidation of or retaliation against individuals who in good faith report a possible violation or other concern regarding this Code, Flatiron policies, laws or regulations, or any other suspected improper, unethical or illegal conduct by anyone at the Company or who provides information to or assists in a Company investigation, evaluation, audit or remedial action. If you believe that you, or another Workforce member, has been retaliated against in violation of this Code, you should report the retaliation to the Compliance Department (Compliance@), People Operations, or the EthicsPoint hotline listed above.

Our Marketplace

Flatiron believes running our business in an ethical, socially responsible manner is a prerequisite for sustainable success. We must, of course, adhere to all applicable laws and regulations. We also must meet our stakeholders' expectations that we behave with integrity in all our business activities. We believe that adhering to our high standards provides us with a critical business advantage.

Flatiron's integrity depends on the behavior of our entire Workforce. You, through your conduct, contribute to Flatiron's overall reputation and integrity. Assess carefully your business behavior and seek help and advice if you are in doubt that it complies with Flatiron's standards.

Competition and Antitrust laws

We support healthy competition. Flatiron believes in competing vigorously but fairly, seeking competitive advantage only through lawful and ethical means.

Competition laws — also referred to as antitrust laws — are designed to protect a free and open marketplace for the benefit of consumers. US federal antitrust laws are grounded in the premise that vigorous competition will produce the lowest prices and the highest quality of products and services for consumers. States and other countries may have other requirements. The legal penalties for breaching competition laws are severe, and Flatiron is committed to complying with all competition laws applicable in the countries where we do business.

Your approach is fairly simple. You should not act in a manner that will disturb or hinder legitimate competition in any anti competitive manner. Seek advice from the Compliance or Legal team, if an answer to a specific antitrust question is not clear.

In particular, you must not:

- Discuss pricing, costs, sales data, bids, contracts, strategic plans or other confidential information with competitors
- Contact or discuss with suppliers or clients actions that may unlawfully exclude competitors from the market
- Enter into agreements preventing suppliers or customers from working with competitors
- Enter into agreements with competitors allocating markets or customers
- Make misrepresentations or dishonest statements regarding our products and services or those of our competitors

The risk arises both ways.
If a competitor raises any of these topics, you should terminate the communication or meeting.

Learn More: Flatiron has developed detailed [Competition Compliance Guidelines](#) to help you.



Aren't we able to gather information about our competitors?

We can, but we must do so fairly, you may use legitimate sources such as publicly available information and customer feedback. But do not use or share any confidential information received inappropriately about our competitors.

How do we participate in oncology conferences, trade associations and other activities where our competitors are present?

Dealing with actual or potential competitors is acceptable in certain contexts, such as at conferences or in industry groups, provided you keep in mind the above. There should not be discussions about potentially competitively sensitive matters about each respective business, such as pending customer bids. If you are representing Flatiron at a trade association or similar industry group seek guidance from Legal & Compliance.

Preventing Bribery and Corruption

[We do not tolerate bribery or any other form of corrupt business behavior.](#) The U.S. Foreign Corrupt Practices Act ("FCPA"), the UK Anti-Bribery Law, and similar US and international laws impose significant penalties for acts of bribery and corruption. Flatiron rejects all forms of corrupt business behavior and is committed to compliance with anti-bribery laws wherever it does business. We do not permit bribes, kickbacks, and other types of payoffs and benefits paid to any healthcare providers, customers, governmental authorities, suppliers, or any other parties or any other corrupt conduct or unlawful exchanges of value, no matter what form these activities take.

[Do not make or promise any payment or provide anything of value to another person or organization with the intent to:](#)

- Improperly induce the recipient to violate his or her duties
- Exert improper influence over the recipient
- Obtain or retain an improper business advantage for Flatiron
- Improperly reward the recipient for past conduct

You also must not authorize any workforce member or agent to do any of the above.

Learn More: Anti-corruption and anti-bribery laws may have very specific requirements depending on your role and location.

The [Foreign Corrupt Practices Act Resource Guide](#) can provide general information; Legal or Compliance can provide you with specific information relevant to your role and location.

[Should I be particularly concerned in interactions with government officials?](#) Offering or providing money or other value to government officials raises special risks under anti-corruption laws and is generally prohibited, unless it has been subject to prior review and approval by the Compliance Department. In Flatiron's industry, it is critical to note that many healthcare professionals outside of the United States are employees or officials of foreign government agencies and other public institutions and, therefore, may be considered government officials under the US FCPA or local laws.

Government Officials, Lobbying and Political Contributions

Interact with government bodies and officials in a proactive, honest, transparent and responsible way. Flatiron is committed to working fairly and honestly with government representatives and agents, and to complying with governmental requests and processes.

No Flatiron funds or assets shall be paid, loaned, given or otherwise transferred in the form of a gift, entertainment or otherwise, directly or indirectly, to any government official or employee, or to any entity in which the governmental official or employee is known to have a material interest, unless it has been subject to prior review and approval by the Compliance Department. This prohibition applies to the use of Flatiron property and to indirect contributions or payments made in any form, such as through consultants, advisors, suppliers, customers or other third parties.

- Be truthful and straightforward in dealing with government representatives
- Do not encourage employees or anyone else to provide false or misleading information
- Report any instances of false or misleading statements to the Compliance Department

Learn More: Reference [Lobbying Training Documentation](#)

Can I, as an individual, engage in political activity? Absolutely. These prohibitions relate to the use of corporate funds or assets. As an individual you may support or make contributions to an individual political candidate, political party, or political interest group (such as a Political Action Committee or “PAC”) in compliance with applicable laws and regulations.

Accurate Reporting and Financial Integrity

Data integrity is key to our business. Data, information or records that upon which we rely, or for which we are responsible, must be true and fair. These can take many forms, ranging from internal information we use to make business decisions, to reports to our provider or life science partner clients, to research and development data and publications, to your personal travel and expense claims or even emails.

We adhere to applicable accounting principles and financial laws and regulations.

The information we supply to our auditors, the Roche Group, regulatory agencies and government bodies, must provide a true and fair picture of the company's business activities and financial position. Employees are required to comply with Flatiron's internal controls, safeguards, and policies.

Learn More: Reference:

- [Procure-To-Pay Policy](#)
- [Travel, Entertainment, SWAG & Credit Card Policy](#)
- [Purchase Card Policy](#)

The confidence and trust of our stakeholders and business partners is essential.

Flatiron's provider and life sciences customers rely on information we provide for critical clinical and research decisions. False or misleading statements or entries in any report, publication, or record may subject Flatiron as a company to liability and Workforce members who engage in such illegal behavior may be personally subject to severe penalties.

Your help is needed:

- Make sure any financial or non-financial information you create, rely upon, or report is true and complete.
- Ensure facts in any Flatiron report, publication, record or other document are not misrepresented.
- Advise financial leadership of ineffective controls or processes, and of financial improprieties or inaccurate financial statements.

Data Stewardship

[We are stewards of the personal data entrusted to us.](#) Although Flatiron does not provide healthcare services directly to patients, the oncology practices, hospitals and academic medical institutions who subscribe to our Flatiron HC products and services have entrusted Flatiron with the personal and health information of the patients that they serve. Our stewardship of this personal information is foundational to our very existence and must underpin everything we do. The protection and responsible use of personal data, including of our employees, clients and others, is reflected in our daily operations, and we will always respect the privacy of individuals in order to earn and deserve their trust.

[What do we do to protect the data?](#) Flatiron maintains physical, technical, and administrative controls to protect individuals' privacy rights.

Your role in protecting personal information:

- Use due care with personal information, including Protected Health Information ("PHI").
- Use and disclose only for the defined legitimate purpose for which it was collected and in compliance with applicable laws, policies, procedures, authorizations and contractual terms.
- Collect or use the minimum amount of personal data required for a legitimate business need.
- Ensure that appropriate agreements and/or required authorizations are in place before exchanging personal data with vendors and other business partners.

Learn More: Reference

- [HIPAA Privacy Policy and Procedures](#)
- [Breach Notification Policy](#)
- [Use and Disclosure of Protected Health Information](#)

Our Personal Integrity

Representing Flatiron Professionally

Our reputation is in your hands. The ways in which each of us, as individuals, conduct ourselves with others at Flatiron or with our external partners and communities, help define our reputation. Flatiron reserves the right to respond appropriately if your personal conduct on or off the job adversely affects your performance, that of others at Flatiron, or the legitimate business interests of Flatiron.

Some tips:

- Treat your colleagues at Flatiron respect and integrity.
- Understand and comply with Flatiron policies and procedures and the laws, regulations, and rules that apply to Flatiron.
- Assure you use proper email content in conveying a professional image and delivering good customer service.

Can I use social media? Social media has many benefits, but we all must make use of these platforms, whether they are operated by Flatiron or not, in a responsible way. You may express your own views and opinions through your personal social media accounts. You may not, however, make representations on behalf of Flatiron, on social media or otherwise, without prior approval. Non-managerial personnel have the legal right to discuss their employment and working conditions with third parties.

Learn More: Reference [Social Media Guidelines](#)

Conflicts of Interest

Your personal interests must not unduly influence your professional judgment. A conflict of interest exists when your personal financial or business interests are inconsistent with those of Flatiron and create conflicting loyalties.

You should avoid:

- Situations conflicting or giving the appearance of conflicting with the interests of Flatiron.
- Using your position at Flatiron for, or participating in decisions leading to, your personal financial benefit or to benefit relatives or close associates.
- Ownership of an interest in a business which is a competitor.
- Ownership of an interest in a client, vendor or other partner with which Flatiron has or is contemplating a relationship.

[I own stock in a number of health care businesses. Is that a problem?](#) A passive investment in a publicly held company is generally not a conflict unless it represents a substantial percentage of the company or of your investment portfolio.

[I have external professional engagements. Is that a problem?](#) Outside employment or consulting and third-party board memberships, may have potential for conflict, disclosure of Flatiron confidential information, or interference with your ability to devote time and attention to your job responsibilities. These issues could also arise in engagements with charitable, not-for-profit or non-commercial entities in the healthcare space. Flatiron Health requires disclosure and approval for all Outside Engagement Activities as defined in the Conflict of Interest Policy.

[What if I am unsure whether I have a conflict?](#) The extent to which a financial interest, relationship or outside engagement may represent a conflict, or potential conflict, with Flatiron's interests is complex and fact specific. Your best bet to avoid surprises and potential issues is to advise your manager prior to engaging in an activity. As always, the Compliance team is here to help.

Learn More: Reference [Conflict of Interest Policy](#)

Gifts and Entertainment

We neither give nor accept gifts or entertainment that could raise concerns about Flatiron's, or your integrity. Even when gifts, meals or entertainment are exchanged out of the purest motives of personal or professional friendship, they can be misunderstood and perceived as an improper advantage.

Gifts, meals, and entertainment encompass anything of value offered or accepted at reduced or no cost. They may give the appearance of a conflict or in certain circumstances be considered bribes or improper payments. Further, there can be certain tax implications when employees provide gifts, meals, or entertainment to third parties.

Some tips:

- Do not offer or provide a gift, meal or entertainment if it could reasonably be expected to affect the outcome of a decision or compromise the recipient's ability to make objective business decisions as it relates to the purchase or subscription of Flatiron products.
- Accept no gift, meal or entertainment if others might perceive it as influencing your ability to make an objective business decision
- Never offer or receive gifts, meals, and entertainment in circumstances where doing so would embarrass Flatiron if it were to be publicly disclosed.

If in doubt about the appropriateness of offering or accepting a gift meal or entertainment, contact the Compliance Department.

[I work with health care professionals. Can I treat them to meals or provide premiums?](#) Employees may provide or accept meals to or from Third Parties, HCPs, or HCIs on an occasional basis, where permitted by local law and subject to the General Guidelines of this Policy.

All such meals must be modest by local standards and provided in a business-appropriate venue that is conducive to informational communication. To provide guidance to Employees on whether a meal is considered modest, Flatiron has established an External Gifts and Entertainment Policy.

[We have asked several physicians to participate on a panel at a client event. May we provide them a gift as a thank you?](#) Gifts may be appropriate in this situation as a means of showing thanks for taking the time to speak at a Flatiron meeting. However, such gifts should be given in a manner consistent with the External Gifts and Entertainment Policy.

[I have been offered a gift card to complete a business related survey. Can I accept it?](#) The Flatiron Gifts and Entertainment policy does not allow employees to accept cash or gift cards from external parties. In addition, you should exercise caution in responding to such requests to assure that you are not disclosing Flatiron business information.

Learn More: Reference [External Gifts and Entertainment Policy](#)

Insider Information and Trading

While working on behalf of Flatiron, you may become aware of material non-public information about Flatiron, Roche, US Pharma/Genentech or other affiliates, or about other companies with whom Flatiron does business, such as our life sciences partners, customers or suppliers. For instance you might receive non-public information about financial results, possible mergers, acquisitions or divestitures, capital increases, capital market transactions, important licensing agreements and other collaborations. In our industry, results from major clinical trials and information about a drug product's performance are particularly sensitive. Both positive and negative information (e.g., the success or the failure of a drug in trials) may be material if non-public.

Keeping this information confidential is critical to Flatiron's success and to maintaining the trust of our partners, but it also is critical to prevent illegal insider trading.

Buying or selling the securities of a company on the basis of material non-public information, is known as "insider trading". Non-public information is material if a reasonable investor would consider it important in deciding whether to buy or sell a company's securities. Insider trading, as well as "tipping" to others who then buy or sell securities on the basis of such non-public information, violate this Code as well as U.S. securities laws and can result in severe penalties.

Protect yourself from being accused of insider trading:

- If in the performance of your duties you learn about non-public information, whether related to Flatiron or a partner company, you may be considered an insider.
- Do not reveal material non-public information to anyone, including members of your immediate family or household; if that person then buys or sells securities based on that information, you may be liable for "tipping." This is true even if you do not personally trade on the information.
- Carefully consider before buying or selling securities of companies that may be affected by the non-public information you hold.
- If you have any doubt about a potential securities transaction, ask Flatiron Legal for help. Never trade in a company's stock if Flatiron Legal advises you not to do so.

Learn More: Reference [Insider Trading Policy](#)

Our Assets

Respectful Use of Company Assets

Electronic communications tools and other Flatiron resources are provided to help you perform your role. Use them in a professional, lawful manner consistent with Flatiron's policies and procedures. Your personal use should not interfere with the performance of any job responsibilities. Protect Flatiron systems, devices, and other resources, as well as any confidential and proprietary information stored on them by complying with information security policies and remaining vigilant of potential vulnerabilities and threats from both inside and the outside.

Your role in protecting Flatiron assets:

- Use electronic communication tools and other Flatiron resources with care, compliantly and primarily for business purposes
- Do not put into e-mail or voice-mail any messages or materials which you would not put in writing in a letter or memorandum
- Inform Flatiron security (sirt@) immediately whenever an electronic communication tool is lost or stolen
- Comply with Flatiron security and other applicable standards
- Never use Flatiron's electronic systems to transmit or download obscene, abusive, harassing or offensive material that would violate Flatiron policies [or any law prohibiting harassment and discrimination]

Information stored, transmitted, received, or contained in Flatiron's electronic systems and devices is Flatiron's property, and Flatiron expressly reserves the right to access and monitor use of our systems and devices by members of the Flatiron Workforce to the extent permitted by law. Employees should not consider any non-business communications or personal information stored on Flatiron systems and devices to be private from Flatiron management.

Intellectual Property Rights

Protect our Intellectual Property("IP"), it's the key to our business. Flatiron's software technology and real-world data are changing the way providers, researchers, and life science communities approach oncology treatment and research. Flatiron protects and defends its valuable innovations through patents, trademarks, copyrights, trade secrets, domain names, and related intellectual property rights. As stated in your employment agreement, all innovations developed during your tenure at Flatiron belong to Flatiron and shall remain with Flatiron after you leave.

Keep intellectual property rights in mind in your daily work:

- Do not make contributions to open source code or input proprietary information into large language models (e.g., ChatGPT) without first checking with IP Counsel.
- Unless there is an NDA in place, do not share Flatiron's IP with third parties.
- When presenting externally, please make sure that you are not sharing any Flatiron IP that is confidential. Other than what has been disclosed publicly (e.g., via marketing materials, publications, issued patents), you should treat Flatiron IP as confidential.
- If working with a contractor or a third party, please make sure that you obtain all appropriate IP rights in connection with any work product or software.
- Respect third party IP. Do not reproduce, or use in presentations, any material copyrighted by third parties without first obtaining or confirming appropriate copyright permission. Comply with applicable license agreements for software and published material.

We are developing a new product that might be valuable IP. Should we be trying to protect it? Yes! Please reach out to Flatiron Health Legal Department (IP Counsel) to discuss if the new product may be a good candidate for obtaining patent protection. It is best to reach out early in the development cycle. Do not share the ideas for the new product outside of Flatiron without first discussing with IP Counsel.

Our competitor has launched a product that seems to be using our technology. What should I do? If you become aware that a third party may be violating any of Flatiron's intellectual property rights (e.g., you are at a conference and a third party seems to be employing Flatiron's proprietary techniques, or you discover Flatiron confidential information online), please reach out to IP Counsel.

Handling Confidential and Proprietary Information

Protecting confidential and proprietary information is vital.

“Confidential information” is information that Flatiron considers private or proprietary and that is not common knowledge outside of Flatiron, such as Flatiron’s business strategy, future plans, financial information, customer lists, contracts, personal data, technical or scientific information about current or future research, trade secrets, or other information that Flatiron deems confidential. In addition, Flatiron partners entrust us with non-public, and often sensitive or personal, confidential or proprietary information. “Proprietary information” is information that Flatiron owns, develops, pays to have developed, or to which Flatiron has an exclusive right such as patents, trademarks, copyrights, trade secrets, and use of rights licensed by others.

Help safeguard confidential and proprietary information:

- Do not discuss confidential or proprietary information in public places, such as elevators, public transportation, or restaurants.
- Do not share such matters with anyone not entitled to know for a legitimate business reason – this includes fellow employees, contractors, spouses, other family members, and friends.
- Share confidential and proprietary information with a third party only if there is a legitimate business reason. Generally this will require a confidentiality agreement (e.g. an NDA).
- Consult legal where a disclosure appears to be required by law (e.g. in connection with reporting to a regulatory authority or if required by a subpoena or a court of law).
- Handle and protect partner confidential and proprietary information in accordance with the Flatiron policy on the Handling of Confidential Information.

If in doubt check with [Legal] to assure that the disclosure is in compliance with all applicable laws and policies.

Learn More: Reference [Handling of Confidential Information](#)

Record Retention and Management

[Records Management requires your close attention](#). Some of the information and documentation you create or receive in the course of your employment are valuable Flatiron assets and are often required by law to be retained by Flatiron for a defined time period. Records may be in various formats and are made up of data and associated metadata. Records relating to Flatiron business belong to Flatiron and not to an individual.

Seek guidance from Compliance or Legal if you have questions about record retention, or whether specific records under your control should be preserved because they might relate to a contractual requirement, a lawsuit or government investigation.

Keep record retention in mind in your daily work:

- Familiarize yourself with the document retention rules applicable to your role and team.
- Protect our records from loss or misuse, maintain their integrity and keep them accessible for business purposes.
- Destroy records using means approved by Security

Learn More: Reference [Data Retention and Destruction Policy](#)

Our Colleagues

Diversity, Equity and Inclusion

Diversity, equity, and inclusion (DEI) are integral to our success. We believe our workforce should reflect the diversity of the many patients who live with cancer. Beyond representation, our DEI efforts aim to ensure that Flatiron is a fair, equitable, and inclusive workplace in which all employees have a sense of belonging. We want you and all of our colleagues to feel secure in being their authentic selves and to feel they are valued and respected and have the opportunity to succeed.

DEI is not done in a silo; rather it is part of our company strategy. We invest in our people and are deeply committed to transparency. We share our DEI goals, metrics and our progress to date with our employees. While we have made progress in some areas, sustainable change takes time and we have more work to do. We use the data to drive understanding of what's important to our employees and drive our actions in order to support employees. Our data helps us identify where we can provide opportunities and improve the experience for all at Flatiron.

Do your part to support a fair, equitable and diverse culture at Flatiron:

- Drive change and shift our culture to contribute in making all employees feel that they belong at Flatiron.
- Do not discriminate against anyone based on a protected status
- Speak up if you become aware of workplace discrimination.
- Flatiron managers ensure a working environment that is free of all forms of harassment, discrimination, and retaliation.

Learn More: Reference [DEI at Flatiron](#)

Ensuring Equal Opportunity Employment

[We are an equal opportunity employer.](#) Flatiron's commitment to equal opportunity is a key element in achieving its full potential. All decisions and business activities regarding recruiting, hiring, promotion, placement, benefits, compensation, employee activities, and other terms and conditions of employment will be made without discrimination on the basis of actual or perceived race, color, national origin, ancestry, citizenship, age, sex, sexual orientation, gender, gender identity or expression, religion, creed, age, pregnancy, childbirth or related condition, physical or mental disability, medical condition, work-related injury, veteran status, familial status, status as a recipient of public assistance, political ideology, genetic information, marital or civil union status, arrest or conviction record, reproductive health decision making, or any other factor that applicable law protects from employment discrimination.

For qualified individuals, Flatiron makes workplace accommodations that comply with applicable laws, and which Flatiron determines are reasonable and needed for

effective job performance. Flatiron does not discriminate against qualified employees or applicants with regard to any terms or conditions of employment because of actual or perceived disability, pregnancy, religion, or status as a victim of domestic violence, a sex offense or stalking, provided the individual can perform the essential functions of the job.

Flatiron managers are expected to ensure a working environment that is free of all forms of harassment, discrimination, and retaliation. When a Workforce member believes discrimination or harassment has occurred in violation of Flatiron policy, that individual may use the reporting processes outlined in this Code to initiate an investigation. In cases where an investigation confirms a violation of this policy or any other policy, appropriate corrective action up to and including termination of employment will be taken, regardless of whether the inappropriate conduct rises to the level of any violation of law.

Learn More: Reference [Equal Opportunity Policy](#)

Preventing Harassment

For all Workforce members, Flatiron policy requires the maintenance of a workplace free from unlawful harassment of any kind (such as verbal, written, visual, or electronic for any reason, including freedom from sexual harassment and freedom from other unlawful harassment on the basis of race, color, national origin, religion, age, gender, sexual orientation, gender identity or expression, disability, marital status, domestic partner status, or status as Vietnam-era or special disabled veteran, or any other characteristic protected under any applicable federal, state or local law. Without limitation, this policy governs conduct in the workplace (including all work-related travel, at any other location where a company-sponsored event takes place, as well as interactions between employees occurring during non-working hours.

Sexual and other unlawful harassment, whether committed by or against members of management, Flatiron employees, or other Workforce members, is strictly prohibited. Flatiron will not tolerate harassment against employees and interns by third parties, such as vendors, consultants, visitors and guests, and the prohibition applies equally to harassment by Flatiron employees or interns toward any such third parties. Every supervisor and manager is responsible for enforcing Flatiron's policies and procedures regarding unlawful harassment and for maintaining a work environment free from such harassment.

Flatiron's Policy Against Sexual and Other Unlawful Harassment contains information about the specific types of conduct prohibited, and employees should feel free to ask Flatiron HR Business Partners for additional information if needed. Any Workforce member who believes they have been subjected to sexual or other unlawful harassment, or has witnessed or otherwise become aware of such an incident may notify any manager or HR Business Partner or use the complaint reporting procedures in this Code.

Learn More: Reference [Policy Against Sexual & Other Unlawful Harassment](#)

Workplace Health and Safety

[We are committed to ensuring a safe and healthy work environment.](#)

Safety. It's important that Flatiron remains a safe place to work, and employees should follow established safety and security rules and practices. Flatiron identification or credentials must not be shared with any person not authorized to use them. Unauthorized access to Flatiron facilities, or assisting others to gain access without authorization is prohibited. Unless authorized by management, individuals working with Flatiron should not carry weapons while on company business.

Flatiron prohibits violence in the workplace or threats of violence or intimidation. If you witness or experience violence or intimidation, or threats of violence or intimidation, directed at you or someone else in our community, please promptly report the situation to Compliance, People Operations, or your manager or any member of the management team. The possession, use, or sale of weapons in the workplace is strictly prohibited.

Drugs, Alcohol & Tobacco. The health and safety of our employees is important. Our facilities are tobacco free. Reasonable alcohol consumption is permitted, provided that it does not impair performance, lead to inappropriate behavior, endanger the safety of others or violate the law. Possessing, using or being under the influence of illegal controlled substances while working or during company related activities is not permitted. If an individual's behavior, appearance, or speech creates reasonable suspicion to believe that an employee is in violation, the employee may be required to take drug or alcohol screening.

Learn More: Reference [Performance and Conduct Standards](#)

Our Compliance Program

Why Do We Need a Compliance Program?

“A comprehensive compliance program provides a mechanism that addresses the public and private sectors’ mutual goals of reducing fraud and abuse; enhancing health care provider operational functions; improving the quality of health care services; and reducing the cost of health care”

Office of Inspector General (“OIG”)

Compliance Guidance for Pharmaceutical Manufacturers (May 5, 2003)

Our Team

The Compliance team is committed to supporting Flatiron’s high standards of integrity and ethics. This not only ensures that we comply with all applicable laws, rules and regulations where we do business, but acknowledges our obligation as a healthcare company to act with integrity.

We are here to help you understand and comply with Flatiron’s corporate principles and policies, as well as applicable laws, regulations, and industry codes.

Reach out to us via any of the following methods:

General Compliance:

Questions about compliance-related policies (e.g. External Gifts & Entertainment, Code of Conduct, Conflict of Interest, Handling of Confidential Information), and all other compliance matters.

- compliance@flatiron.com

Third Party Risk Management:

Questions about any third party-related risk areas or concerns (such as Regulatory, Financial, Business Continuity & Resiliency, or Strategic risks); Compliance TPRM software (Navex RiskRate)

- compliance-tprm@flatiron.com
- #help-compliance-tprm

Policy Management:

Questions about where to find policies, policy definitions, Compliance PolicyTech software, and all other policy-related matters.

- compliance-policy@flatiron.com
- #help-compliance-policy-mgmt

Addressing Non-Compliance and Workforce Expectations

Flatiron is committed to fully investigating and addressing all reports of alleged violations of this Code, any company policy, or any applicable law by:

- Taking all allegations of noncompliance seriously;
- Investigating any such allegation efficiently and in a timely manner;
- Assessing the facts objectively and impartially; and
- Taking adequate corrective measures and sanctions, in any case where an allegation is substantiated.

Compliance will coordinate investigation and resolution with Flatiron's Legal and People teams to manage reports or allegations of noncompliance. Workforce members are expected to fully cooperate with any such inquiry or investigation. Failure to adhere to the Code, Flatiron policy, or any applicable law may result in disciplinary action, up to and including termination of employment or other relationship. Moreover, if Flatiron determines that any laws have been violated, or if there is a potential legal violation, Flatiron will cooperate fully with all appropriate authorities and expects Workforce members to cooperate fully with appropriate authorities as needed.

It is the responsibility of every employee, officer and director ("Flatiron Staff") of Flatiron to read, understand and comply with this Code, as well as all applicable Flatiron policies, and other other laws and regulations that apply to the business. In addition to reading this Code, Flatiron Staff are responsible for staying up-to-date with all relevant Flatiron policies that are available and ensuring they are acting in accordance with those policies. Failure by Flatiron Staff to adhere to the principles set forth in this Code and relevant Flatiron policies may result in corrective action, up to and including termination.

Responsible Business Sustainability

Our success hinges on our ability to develop strategies benefiting both industry and society. In a rapidly evolving and complex healthcare environment we must deliver medical solutions and research insights, provide a rewarding workplace, be a trustworthy partner and support the communities in which we operate. Flatiron is an affiliate of the Roche Group, which for nearly 120 years has been committed to improving lives. Sustainability is in the Roche Purpose Statement, anchored in the Roche Corporate Principles and forms the foundation of the business model.

This vision shapes the way we make a difference to the lives of patients around the world. If we are successful in delivering innovation to patients, then we create value for all other stakeholders too. Flatiron is dedicated to supporting Roche's vision for responsible business sustainability in a meaningful way.

Learn More: Reference [Roche sustainability](#)

Your Compliance Resources

On the Web

- [Legal, Privacy & Compliance](#)
- [Compliance and Ethics Line](#)

Compliance

- Compliance@
- Compliance-TPRM@
- Compliance-policy@

Audit & Investigations

- audit_investigations@

Privacy

- privacy@
- sirt@ for data incidents

**Hardcopies of the Code of Conduct are available
upon request to the Compliance Department**

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Pg. 10	Preventing Bribery and Corruption	Foreign Corrupt Practice Act Resource Guide
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