

# Code of Conduct



June 2023



## Stephen Gillett

Verily CEO

## A message from our CEO

Collecting and analyzing health information comes with a great responsibility towards the individuals who provide it to us and our partners. We live up to this responsibility by acting with integrity, conducting business ethically, following the law, being transparent, and treating others with respect. This is foundational for maintaining trust with our customers and the public.

Launched from Google X, Verily was built upon a legacy of innovation and human centered design. We have an exciting opportunity ahead of us to tackle some of our industry's biggest challenges by bringing together healthcare and technology to create ethical, dependable, and trusted solutions. If we can work efficiently together to make the right decisions, we will gain velocity as One Verily.

Everyone's voice matters. To succeed in our mission of bringing precision health to everyone every day, listening and learning from others is key. This can only happen if we look inside, out. As a team, we will continue to speak up and encourage people to feel comfortable asking questions, raising concerns, and expressing different points of view.

Our Code of Conduct is designed as a roadmap to provide you with guidance on how we expect Verily employees to live the Verily values and make ethical decisions in our leadership and work. We know that you will use good judgment, our policies and guidance, and our Code to demonstrate our commitment to our values and One Verily culture.

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# Our purpose, culture, and values

## Bring the promise of precision health to everyone, every day.

We are closing the gap between research and care with end-to-end clinical, scientific, and tech expertise to bring the promise of precision health to everyone, every day. By reframing evidence generation around the patient journey, we can gain a deeper understanding of each individual's life experience and change the way healthcare is delivered.

To achieve this purpose, we built a foundation of strong values, a critical component of our One Verily culture. They are the guiding principles for how we act toward each other, our customers, and partners, and serve as a compass in our

everyday actions and decision-making. Values also tell our partners and customers who we are and make it clear what they can expect from working with us.

Verily's Code of Conduct is a statement of our shared commitment to innovate healthcare and technology with integrity and transparency. Our Code is your starting point to find guidance for navigating difficult situations, making ethical decisions, and helping you act in line with our values. While no single source can address all the issues that could come up, our Code serves as a reference document on where to seek further guidance, ask questions, and raise concerns.

## Our Verily values



**Innovate  
Healthcare &  
Technology**

- Look out windows, not into mirrors
- Embrace the challenge of focused disruption
- Learn from our customers
- Create ethical, dependable, and trusted solutions



**Gain Velocity  
as One Verily**

- Building over talking
- Act quickly together
- Value simplicity and resourcefulness
- Solutions and customers speak for us



**Respect  
Individuals**

- Honor life journeys of others
- Safeguard data
- Kind and candid transparency

## Your responsibilities

At Verily, we **Respect Individuals**. Each of us is responsible for following our Code and holding each other accountable for the same.

Our Code applies to all employees of Verily and its subsidiaries (Veeps) everywhere we do business. We also expect anyone acting on our behalf to conduct themselves in a manner consistent with our Code and other policies.

This includes our board members, suppliers, third party partners, consultants, joint ventures, temporary staff, contractors, vendors, and any other business partners.

We are all expected to know and follow our Code. Violation of our Code, applicable laws, Verily policies, or guidance may lead to disciplinary action up to and including termination of employment.

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### As Veeps, you are expected to:

#### **Live the Verily values**

Conduct business on Verily's behalf with integrity, professionalism, and in alignment with our values.

#### **Understand our Code**

Read our Code carefully, refer to it often, and make sure you understand the contents of each section.

#### **Follow the rules**

Get to know the laws, Verily policies, and relevant guidance that apply to your job. Follow them consistently, timely complete all training, and ask questions if something is not clear.

#### **Prioritize Verily's business interests**

Look out for Verily's best interests when making business decisions or taking action.

#### **Be part of the solution**

Treat others with respect and compassion, pause before you act, and do your part to protect Verily's brand and reputation.

#### **Speak Up!**

Speak up if you have a question, a different point of view, or a concern. We provide options for reporting concerns, including your manager, People & Culture Team (PACT), Trust & Compliance, and the Verily Ethics Hotline. Watch out for potential violations of laws, our Code, or Verily policies, and report your concerns immediately.



## Additional responsibilities of managers

Verily has three key expectations of our managers in order to reinforce Verily's commitment to integrity and ethics and create a north star for how we lead our teams: **Develop Precisely**, **Activate the Team**, and **Lead with Care**.

### Develop Precisely and lead by example

- Be a role model for ethical, caring, and humble leadership
- Demonstrate personal accountability and foster transparency, respect, and integrity
- Make sure your team completes all required training

### Activate the Team and be a resource for others

- Be familiar with our Code and applicable Verily guidance
- Answer questions and empower your team to be familiar with available resources

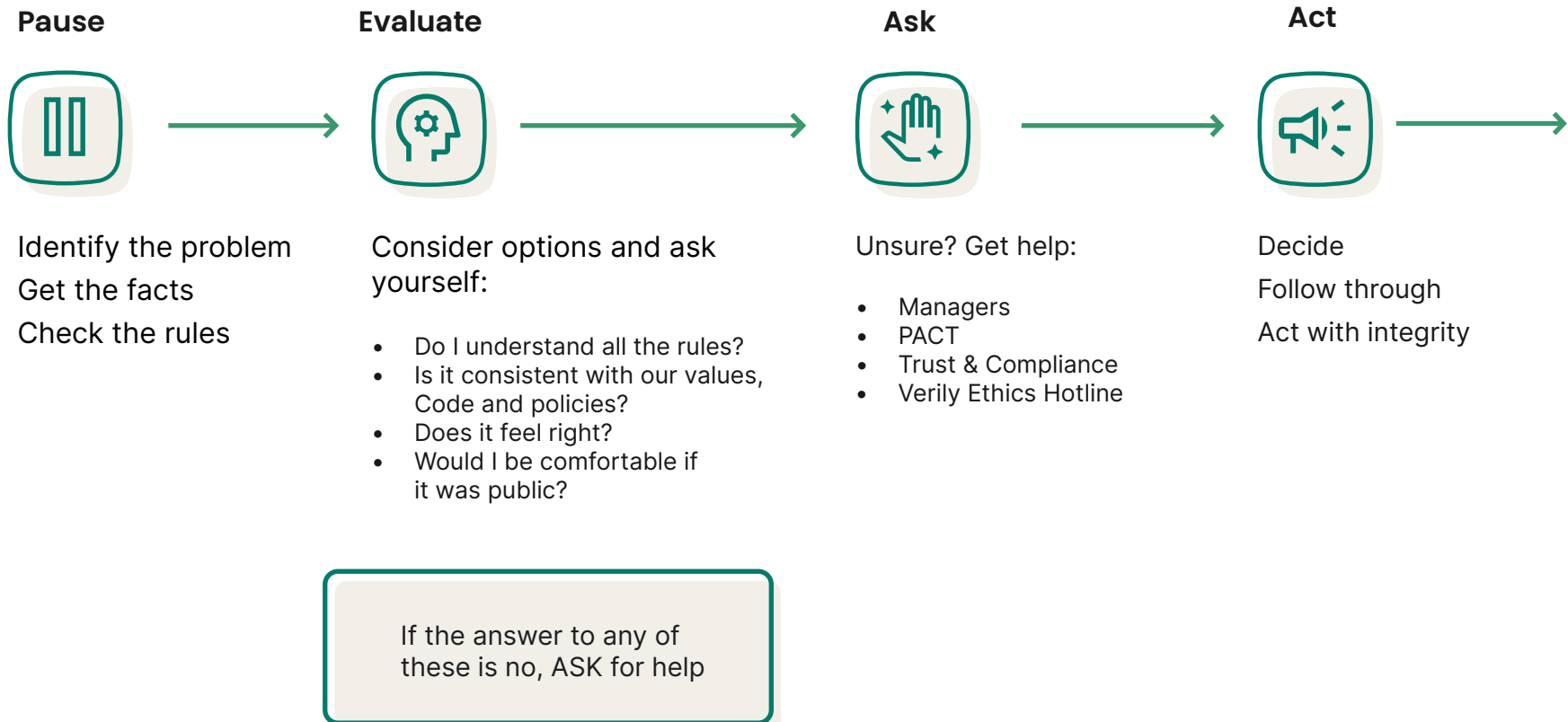
### Lead with Care and support those who speak up

- Maintain an environment where employees feel comfortable and supported when expressing different points of view, asking questions, and raising concerns
- Promptly escalate any suspected policy violations, unlawful conduct, or unethical behavior through the correct channels



# Making ethical decisions

Consistent with our values, we use good judgment to make decisions. We have established Verily's ethical decision-making framework to help navigate tough work situations. When faced with a dilemma, take time to pause, evaluate options, get help, and then act.



# Speaking up

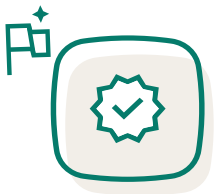
At Verily, we support continuous learning—which requires input from diverse voices. Speaking up helps us hear different perspectives, share ideas, learn about issues, and manage risks before they become problems. Speaking up takes courage, and when you do—we will listen and take appropriate action. Your voices deserve to be heard.



**Speak Up!** raise your hand to ask questions, express different points of view, and share concerns



**Listen Up!** actively listen and pay attention to raised concerns—we have an open door culture and encourage open communication, feedback, and discussion



**Follow Up!** we commit to taking reports seriously, investigating when necessary, and following up with those who raise concerns

## **Manager Spotlight**

Managers must report concerns of policy breaches, unlawful conduct, or unethical behavior to PACT or Trust & Compliance



# Ways to Speak Up

## Where can you get help?

Raise a concern or ask a question

### Verily Ethics Hotline

Available 24 Hours a Day, 7 Days a Week

You may report anonymously

Use your report key and PIN to follow up

- Direct Manager or Other Management
- People & Culture Team (PACT)
- Trust & Compliance

**INTERNET:** [go/verily-hotline](https://go.verily-hotline)

**PHONE:** 1-800-259-8129 (US)

**TEXT:** 1-650-376-7423 (US)

**VERILY PROHIBITS RETALIATION** of any kind against anyone who reports concerns in good faith.

## I raised a concern, now what?

We will treat all concerns and information provided confidentially to the fullest extent possible. Your concern or question will be reviewed by the right person or group to determine the best next steps.

We may ask follow up questions or conduct an investigation to help us determine how to proceed. Investigations take time—please know that we are thoughtfully working through your report as promptly as possible even if it takes a while to close out. If you have questions or want an update during the process, please ask!

### 🔍 What do we need from you?

Veeps are expected to cooperate, be truthful, and forthcoming during the course of any company investigation.

## Zero tolerance for retaliation

We prohibit any form of retaliation or intimidation against anyone for their good faith report. Any employee who retaliates against anyone for raising a concern, reporting misconduct, or participating in an investigation will be subject to disciplinary action up to and including termination of employment. If you believe you or a coworker are being retaliated against, use the [“Ways to Speak Up”](#) defined in our Code to report your concerns. For more info, see our [go/verily-policies](#) page.

### 🔍 What is good faith?

Sharing a concern in good faith means that you honestly suspect there is a violation of our Code, our policies, or the law, and that you are not deliberately making a false report.

### What is retaliation?

An adverse action that can take various forms, such as threats, mistreatment, harassment, negative performance reviews, demotion, suspension, reduced compensation, denial of benefits, or termination.

## Avoiding conflicts of interest

We **Gain Velocity as One Verily** by acting in the best interest of the company, our customers, and avoiding situations where a personal or financial interest or outside activity conflicts or appears to conflict with company loyalty.

### Why it matters

A conflict of interest may unconsciously influence decision making and can impair our ability to innovate and compete. Even the appearance of a conflict with company loyalty can harm our reputation, risk disclosure of confidential information, put our intellectual property at risk, create liability, and undermine the trust of our customers, Veeps, and the public.

### What it looks like at Verily

We avoid circumstances that create a conflict of interest, such as outside work (including starting your own company), advisory roles, or Board positions with a company that competes with a Verily or Alphabet product or service. Many potential conflicts of interest can be resolved, so disclose to your manager and then Trust & Compliance. If a potential conflict is approved, comply with guidance from Trust & Compliance, including recusing yourself from involvement in any Verily or Alphabet matters.

### We don't:

- Disclose confidential Verily information or another company's confidential information
- Use corporate resources for personal financial gain or a non-Verily interest
- Allow outside work to interfere with your Verily work
- Supervise, exercise authority over, or provide performance feedback on a Veeep you are in a close personal relationship with
- Participate in the selection of a vendor if you have a close personal relationship with one of the potential vendors
- Accept excessive gifts, meals, or entertainment from people or companies doing or seeking to do business with Verily

### 🔍 We provide additional guidance on the following common types of conflicts of interest:

- Board positions (including Advisory Boards)
- Outside work
- Significant personal investments
- Gifts, meals, and entertainment
- Speaking engagements
- Close personal relationships

### Learn more:

- [Verily Conflicts of Interest Policy and guidance](#)
- [Verily Gifts and Entertainment Policy \(Non-HCP and Non-Government\)](#)

## Our VIBE—building Verily’s inclusive culture of belonging

We are committed to nurturing and sustaining a One Verily culture where our values are lived every day. Critical to this is an environment of inclusion, belonging, and equity for all Veeps. This is what we call our VIBE.

### Why it matters

Our purpose is inclusive in its nature: to deliver on the promise of precision health for everyone, every day. We expect each of us—no matter our level, role, or function—to uphold our collective accountability to sustain our One Verily culture and create a VIBE where all Veeps feel included, have a sense of belonging, and have equitable opportunities to grow.

### 🔍 Equal employment opportunities

We do not discriminate based on age, ancestry, color, family or medical care leave, gender identity or expression, genetic information, marital status, medical condition, national origin, physical or mental disability, political affiliation, protected veteran status, race, religion, sex (including pregnancy), sexual orientation, or any other characteristic protected by applicable laws, regulations, and ordinances.

We are committed to hiring people with disabilities and providing reasonable accommodations to qualified employees.

### What it looks like at verily

These are example actions that you can take to help everyone around you feel welcomed, respected, and valued:

- Seek to listen and understand the viewpoints of others
- Create a safe environment where all perspectives are welcome
- Agree to disagree and move on, united in our shared purpose
- Always start from a place of empathy
- Remember that our collective impact is greater than the actions we take alone



Nurturing and sustaining our One Verily culture and VIBE starts with you. It is your responsibility to go above and beyond to make those around you feel included and valued, while following company guidelines. If you see something that violates our policies surrounding equal employment or local laws, use the [“Ways to Speak Up”](#) defined in our Code to report your concerns.

### 🔍 We respect each other

All Veeps should be treated with dignity and respect consistent with our VIBE. We promote and value a work environment free of harassment, including unwelcome actions, comments, behaviors, or other conduct based on an individual’s protected personal characteristics that are intimidating, hostile, abusive, or create an offensive working environment. Harassment can range from extreme forms such as violence, stalking, threats, making unwanted sexual advances, or physical touching, to less obvious actions like ridiculing, teasing, or jokes based on a person’s protected status, as outlined in our global and local policies. For more info, see our [go/verily-policies](#) page.

Keep our workplace free from harassment and discrimination and speak up if you see or suspect it.

### 💡 Manager Spotlight

Remember, managers have the added responsibility to nurture and maintain an inclusive working environment that is free of harassment, discrimination, and retaliation, and must report any concerns related to these issues through the appropriate channels.



## Promoting a safe and healthy working environment

We have a responsibility to maintain a safe and healthy workplace for our employees, business partners, customers, contractors, and visitors.

### Why it matters

At Verily, our most precious resource is our people, and every individual deserves to feel respected and safe at work. Safety is a priority in everything we do. Health and workplace safety regulatory requirements help ensure that all employees will be able to come to work without fear of avoidable harm or injury.

### What it looks like at Verily

Verily is committed to running safe, compliant, and sustainable operations that follow local, state, and federal environmental codes as well as Environmental Health & Safety (EH&S) program guidance. We all contribute to this by:

- Knowing and following our safety standards, including emergency response plans
- Promptly reporting any safety concerns that may arise to your manager, building facilities, and/or the appropriate authorities

Threatening or violent behavior is prohibited at Verily and must be reported immediately.

If an incident occurs which threatens the health, safety, security, or environmental surroundings of people in or around our facility, contact Security, the EH&S team, Verily Real Estate and Workplace Services (REWS), [go/verily-rews](#), and/or the appropriate authorities (for example, always dial 911 for emergencies in the United States).

### 🔍 **Drugs and Alcohol Policy**

Verily is committed to working in an environment free of substance or alcohol abuse, in accordance with the Federal Drug Free Workplace Act. Occasionally, work events may provide alcohol, but use good judgment and behave responsibly and safely. We prohibit the possession or use of illegal controlled substances at our office or work events, as well as smoking inside our offices, within posted distance outside of Verily buildings, and on company-operated shuttles.

### 👤 **Manager Spotlight**

Managers are responsible for promoting a safe work environment free of excessive drinking or substance abuse and are expected to address inappropriate conduct.



## Data protection and privacy

We **Safeguard Data** by protecting patient privacy and collecting and using data responsibly.

### Why it matters

We are making long term investments in our relationships and are focused on building solutions that are safe and secure with individual goals in mind. When individuals give their personal health information to us, they should understand how it will be used and how it will be protected. If we fail to do that, then we are putting them, ourselves, our business partners, and colleagues we work with at risk.

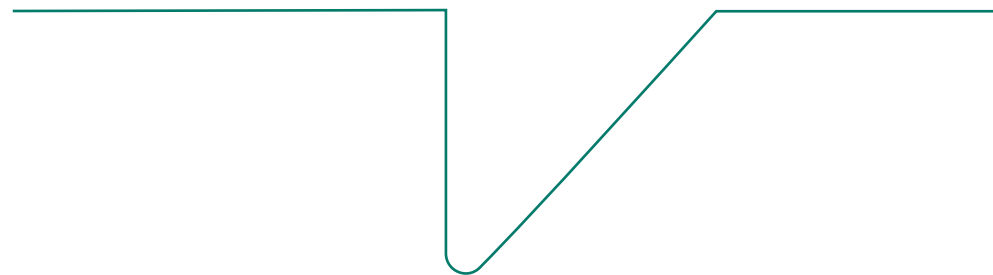
### What it looks like at Verily

We are committed to being good stewards of any data that moves through our systems, so we work closely with our partners and our users to protect privacy and security. This means:

- **Give users a choice.** Always obtain informed consent from patients when required, and use the data only for permitted purposes. We have built eConsent capabilities for explicit consent and permissions throughout our process
- **Protect the data in our care.** We collect and use the minimum amount of personal data necessary, keep it only as long as necessary to achieve our business purposes, and use it in accordance with Verily's policies and applicable laws and regulations
- **Collaborate with partners responsibly.** Share data only as permitted with those who have a legitimate need for it and commit to treat it appropriately

- **Build privacy and security into our products.** Consider the necessity of any data collected and review uses and disclosures of data
- **Help users manage their data.** Use clear and understandable language to notify users of our products and services about the data that we are collecting and how that data may be used

We have a Chief Privacy Officer, personnel, policies, and guidance designed to support the privacy and security of the data entrusted to us. If you have questions about data privacy, please contact us at [prisec@verily.com](mailto:prisec@verily.com).



### Learn more:

- [Verily Privacy Policy: https://verily.com/privacy-policy](https://verily.com/privacy-policy)
- [Verily Privacy and Security Policies for Protected Health Information Covered by HIPAA](#)
- [Verily Product and Data Guidelines](#)

## Protecting Verily assets

We have a responsibility to respectfully use and safeguard Verily’s assets so we are able to run our business efficiently and maintain trust in our products and use of patient data.

### Why it matters

Verily physical and electronic assets (ranging from computers and mobile devices, to systems, sites, and networks) are valuable resources that help us run our business. Loss of, misuse of, or unauthorized access to these assets can have a serious impact on our company and other Veeps.

### What it looks like at Verily

We must all actively work to protect Verily assets:

- Use Verily assets for business and authorized purposes only
- All business-related data and information is Verily property and should only shared with others on a need-to-know basis
- Report any unusual network or data activity to Verily Security and report any issues related to site security to Verily REWS
- Treat Verily assets with care and secure your devices whenever left unattended



🔍 All information stored on Verily property is subject to privacy and confidentiality requirements. Access to this information is only for the duration of your Verily employment and ends if you leave the company.

### Learn more:

- [Verily Security Policies](#)

## Confidential information & insider trading

We protect Verily’s trade secrets, avoid improper use or disclosure of confidential information, and we never trade securities on non-public information.

### Why it matters

As Veeps, we may have access to confidential information concerning Verily, our partners, or customers. We build trust in our brand by protecting this information. Unauthorized disclosure or misuse of confidential information could adversely impact our business, damage our reputation, and create substantial legal liability for Verily and anyone involved.

### What it looks like at Verily

It is our responsibility to protect the confidential information of our company, business partners, stakeholders, customers, and third parties. This means:

- Properly secure, label, retain, and dispose of Verily confidential information
- Do not share Verily’s confidential information unless otherwise authorized
- Make sure that information shared with partners is protected by a confidentiality agreement and comply with the terms of these agreements
- Do not disclose or use confidential information belonging to third parties that you may have obtained through prior employment or engagements outside of Verily
- Do not share or use inside or material, non-public information to buy or sell securities

Q **Confidential Information includes non-public information that might be useful to competitors or harmful to Verily or our customers if disclosed:**

- Trade secrets
- Proprietary information and data sets, such as analytical results, source code, models, and algorithms
- Personal information (such as customer information or employee data)
- Commercial or financial data (such as business plans and strategy materials)
- Contract terms and unannounced business relationships (including potential acquisitions and investments)

**Insider trading is illegal.** Insider trading occurs when an individual uses confidential or material, non-public (or “inside”) information for personal gain or to benefit someone else.

### Learn More:

- [Verily Trade Secrets Policy](#)
- [Verily Confidential Information and Inventions Assignment Agreement \(CIIAA\)](#)
- [Alphabet’s Policy Against Insider Trading](#)

## Communicating responsibly

We are committed to clear and consistent public communications in all forms, and embrace the responsible use of business tools, such as social media, to connect, communicate, and share ideas.

### Why it matters

Our public communications provide us an opportunity to tell a story about Verily in a powerful brand voice, but with great power comes great responsibility. It is very important that we follow our Code, related policies, and messaging guidelines to ensure we remain consistent in the way we talk about Verily as a company and the purpose that guides us. Communicating carefully and responsibly helps to preserve our brand, drive consistent communications, and guard our reputation and confidential information.

### What it looks like at Verily

These principles apply to all our communications—including those on social media:

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#### Learn More:

- [Verily Social Media Policy](#)

#### 🔍 Do

- ✓ Remain mindful of our values and our Code, always communicating with truth, clarity, and respect
- ✓ Unsure of what to do? Reach out to Verily's Communications Team
- ✓ Be respectful and recognize that your conduct may impact the way others view Verily

#### Don't

- ⊘ Claim to represent Verily in what you are saying on social media unless you are authorized to do so
- ⊘ Disclose non-public information or other confidential, proprietary information on social media
- ⊘ Use personal social media applications or accounts for work purposes
- ⊘ If you are contacted by the press, don't engage (which means, commenting, sharing information, or promising anything to a member of the press). Direct them to [press@verily.com](mailto:press@verily.com)

## Research integrity

We conduct, evaluate, and share evidence generated from ethical, high quality, and scientifically-sound research in compliance with applicable laws, guidelines, and industry best practices.



### Why it matters:

Integrity in research demonstrates respect for research participants and the potential impact our research has on the precision care of patients everywhere.

At Verily, we live our commitment to integrity and respect by conducting rigorous, purposeful science that does not compromise participant safety or privacy, public trust, or Verily's reputation.

### What it looks like at Verily

- We cultivate a culture of quality, safety, and compliance in research to accelerate evidence generation and build products that enable more personalized care
- We choose clinical researchers and investigators based on their expertise and qualifications for the particular product or research topic
- We guard study participants against unnecessary and inappropriate risk
- We conduct our research and development in compliance with applicable laws, regulations, and ethical guidelines related to good laboratory practices (GLP) and good clinical practices (GCP)
- We publish on our research and data in ways that enable transparency and facilitate accurate interpretation and verification

### Learn More:

- [Verily Regulatory Compliance Policy](#)
- [Verily Scientific Publications Policy](#)

## Product quality

We are committed to quality and safety standards that protect customers and the healthcare community.

### Why it matters

Members of the healthcare community rely on us to provide products and data that improve health and enhance quality of life. This can only happen if our products are of high quality, safe, reliable, and effective. Failure to safeguard our products and data or to report a known Adverse Event or Product Complaint can have serious consequences to Verily and the customers we serve.

### What it looks like at Verily

- We deliver products and technologies that meet quality and safety standards and satisfy all applicable laws and regulations that govern product quality
- We monitor and evaluate the safety and quality of the products and data we create
- We monitor for and promptly report Adverse Events and Product Complaints to regulatory agencies, when required

🔍 **Veeps must report Adverse Events or Product Complaints within 24 hours of learning about it to Verily Member & Patient Success (MPS) at [mpsuccess-leads@google.com](mailto:mpsuccess-leads@google.com)**

**Adverse Event:** any unintended or unfavorable symptom, condition, situation, or result associated with the use of a Verily product, whether or not you think it might be related to the product.

**Product Complaint:** any communication that alleges deficiencies related to the identity, quality, durability, reliability, usability, safety, effectiveness, or performance of a product or clinical trial material and/or its packaging components that affects the performance of such product.

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### Learn More:

- [Verily Quality Policy](#)



## Interactions with the healthcare community

At Verily, we are committed to interactions with members of the healthcare community (HCC) that:

- Are ethical and professional
- Do not improperly influence them in deciding to work with Verily or recommend/choose Verily services/products
- Comply with applicable laws, regulations, and our values

### Why it matters

Customers are at the center of everything we do, and we are developing trusted and ethical products and services tailored to their needs. We respect the independent clinical judgment of our partners and healthcare community members regarding the best product and treatment for their patients. Inappropriate attempts to influence this independent judgment can negatively impact patient care and damage the reputation of Verily and our customers.

### What it looks like at Verily

We interact with members of the HCC in many ways, including clinical research, product development, training and education, and promotional activities.

When interacting with the HCC we:

- Do not interfere with their independent clinical judgment
- Never promise or give anything of value to improperly influence their decisions
- Act with integrity and be mindful of how our actions may appear to others
- Provide truthful information regarding our products or services that is not misleading and is appropriately substantiated
- Respect patients and the patient-physician relationship

### 🔍 What is a Healthcare Professional (HCP)?

An individual or entity that provides healthcare services, treatment, or research such as Nurse, Technician, Physician Assistant, or Hospital. Includes individuals who administer, prescribe, purchase, recommend, or are in a position to influence the use of our products.

### What is the HCC?

The HCC is a broader group of individuals and entities involved in healthcare that we interact with at Verily. This expands beyond HCPs to include patients, payors, and advocacy groups.

### Learn More:

- [Verily Interactions with Healthcare Professionals Policy](#)
- [Verily Interactions with Patients Policy](#)

## Anti-bribery & anti-corruption

We conduct business in an ethical manner and prohibit bribes and corruption in any form.

### Why it matters

Corruption undercuts our mission, hurts our reputation, and the consequences of violating bribery laws can be severe for you and Verily. We always compete ethically, transparently, and fairly in the marketplace.

### What it looks like at Verily

We interact with a wide variety of stakeholders and decision makers, including HCPs, government regulators, non-governmental organizations, and inspection authorities. We do not offer, accept, give, or receive anything of value intended to improperly induce or reward the actions or decisions of another. This means:

- Do not offer, give, accept, or overlook bribery within our business dealings
- We can be held responsible for the actions of anyone who represents us, so follow our due diligence process and speak up if you have concerns about third parties
- Accurately document transactions and maintain complete records



### 🔍 What is bribery?

Bribery is the offering, giving, receiving, or soliciting of any item of value in order to wrongfully influence someone's actions.

### Examples of "anything of value":

- Cash and cash equivalents
- Gifts, meals, entertainment, or other hospitality
- Educational items
- Grants, donations, and sponsorships
- Free-of-charge products and product discounts

### Learn More:

- [Verily Anti-Bribery and Anti-Corruption Policy](#)

## Interactions with government officials

To promote transparency, consistency, and integrity, we are thoughtful about our interactions and communications with government officials, being mindful to honor our values and comply with applicable policies and laws.

### Why it matters

Our relationships and communications with government officials are critical to the development and regulation of our products, technology, and ultimately our ability to serve patients.



### What it looks like at Verily

Veeps who may interact with government officials need to understand our policies and should work closely with our Government Affairs and Trust & Compliance departments to make sure any limitations regarding communications and interactions are understood. When interacting with government officials:

- Act with integrity and never make false or misleading statements or claims
- Consult with Verily Government Affairs before beginning lobbying activities
- Do not provide, or promise to provide, gifts, meals, hospitality, or anything of value to government officials without checking and following our policies or asking for help
- If you are contacted by a government, regulatory, or law enforcement agency, reach out to Legal for support before responding or taking action

#### 🔍 Who is a government official?

Includes any government employee; candidate for public office; or employee of government-owned or -controlled companies, public international organizations, or political parties.

#### Learn More:

- [Verily Interactions with the U.S. Government and U.S. Government Officials Policy](#)

## International trade

International trade laws are complex. We are careful not to conduct unauthorized business with countries or third parties that are subject to sanctions or restrictions.

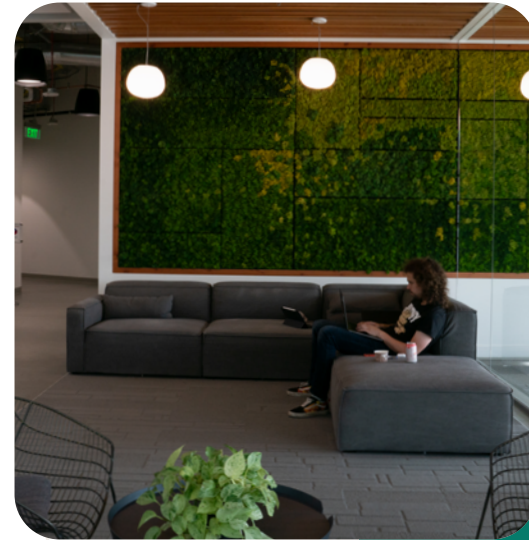
### Why it matters

Failing to comply with trade laws can impact our reputation, lead to significant fines, and could even result in the loss of export privileges. When conducting international business, we must become familiar with trade laws, which can vary widely around the world.

### What it looks like at Verily

We take the time to understand our business, those we interact with, and how trade laws apply. This means:

- Reach out to Legal for questions regarding cross-border transactions
- Make sure third parties complete our due diligence requirements before beginning to work with them
- Accurately document all import, export, and customs transactions
- Verify that transactions do not involve restricted or sanctioned countries, regions, companies, or people



🔍 An **import** occurs every time a physical good crosses an international border.

An **export** occurs every time hardware, software, or technology/technical data cross an international border.

**Did you know?** Exposing or allowing access by non-U.S. persons to U.S. technical data can be an “export,” regardless of what country the exposure occurred in.

### Learn More:

- [Verily Import Compliance Policy](#)
- [Verily Export Compliance Policy](#)
- [Verily US Embargoed Country Travel Policy](#)

## Fair competition and antitrust laws

At Verily, we support an open and competitive marketplace and only compete for business on the merits of our products and services.

### Why it matters

Competition and antitrust laws are designed to promote fair competition, innovation, and efficiency in the marketplace and protect customers from improper business practices.

### What it looks like at Verily

Verily prohibits any business conduct, activity, or transaction that is a violation of any global antitrust and competition laws. This means:

- Deal fairly and honestly with our customers and competition
- Do not discuss or make any improper agreement with our competitors
- Only collect business information about other companies in a manner that is ethical, lawful, and meets confidentiality obligations
- Consult with Legal if you have questions about interacting with competitors or partners



- 🔍 Examples of an **improper agreement with competitors** include those that:
- Affect price or costs
  - Allocate markets or customers
  - Unfairly restrict trade
  - Exclude competitors, suppliers, or customers from the marketplace

### Learn More:

- [Verily Global Competition Policy](#)

## Financial integrity and accurate recordkeeping

As stewards of Verily and its resources, we are committed to maintaining accurate books and records, and making accurate, timely, and understandable disclosures about our company and the work that we do.

### Why it matters

Guarding our assets and maintaining accurate business records are important to protect our business practices, drive our brand, and engage transparently. We are all responsible for following Finance policies and procedures and our expense reports, purchase orders (POs), invoices, and other records must be complete, accurate, and approved. Verily maintains a system of internal controls designed to facilitate transparency into our business and drive compliance with legal, accounting, tax, and other regulatory requirements in every location in which we operate.

### What it looks like at Verily

- Make payments only where they are appropriately supported by documentation and approval
- Create, maintain, and approve business records, including expense reports, that are complete, accurate, and true
- Retain both physical and electronic business records in a safe and secure manner in accordance with our record retention policies
- Follow all Financial policies and procedures, including fully cooperating with financial reviews and internal and external audit requests
- Do not conceal transactions or make false or misleading entries or records
- If you receive a request for information related to legal action regarding Verily, another Veep, a Verily customer, or an individual user or partner, reach out to Legal for support before responding or taking action

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### Learn More:

- [Verily Travel & Expense Policy](#)
- [Verily Purchasing Policy](#)
- [Verily Records Management and Retention Policy](#)



## Personal political activity


We support and encourage Veeps to participate in the political process, but these activities should be separate from your work at Verily.

### Why it matters:

Laws restrict Verily's ability to engage in corporate political activities, and keeping work and personal political activities separate helps to create an inclusive and productive environment for all Veeps.

### What it looks like at Verily:

Personal political activity must involve your voice, time, and resources only.

 **Personal Political Activity** includes activities that support, oppose, or raise money for a candidate, party, political committee, or ballot measure. It also includes voter registration and engagement activities.

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### Learn More:

- [Verily US Political Law Policy](#)

## Protecting the environment

Verily is dedicated to operating globally in an environmentally responsible way, and is committed to safe and compliant operations.

### Why it matters:

Respecting and caring for the environment helps us protect our Verily colleagues, business partners, visitors, and the communities in which we live and serve.

### What it looks like at Verily:

We are committed to integrating sustainability into our operations and we comply fully with local, state, and federal environmental codes as well as EH&S program guidance. This means:

- Minimize the use and release of hazardous material and ensure its safe treatment and disposal
- Promptly report all environmental hazards
- Consider sustainability in our everyday decisions
- Work to reduce our carbon footprint

## Working with third parties

We engage business partners who operate in a manner that is consistent with our values and policies.

### Why it matters:

Third parties acting on Verily's behalf are a reflection of our company and can significantly impact our business and reputation. We can be held responsible for actions taken on our behalf.

### What it looks like at Verily:

Do not engage with third parties that violate our policies or ask or suggest engaging in activities that are not allowed under the law or our policies. This means:

- Conduct diligence on third parties prior to contracting
- All contracts must be in writing with appropriate approval
- We clearly communicate our third party expectations through our Supplier Code of Conduct
- We work with and source from reputable third parties

🔍 We do not permit "side agreements," which are commitments between Verily and a third party that are not in writing or properly approved.

### Learn More:

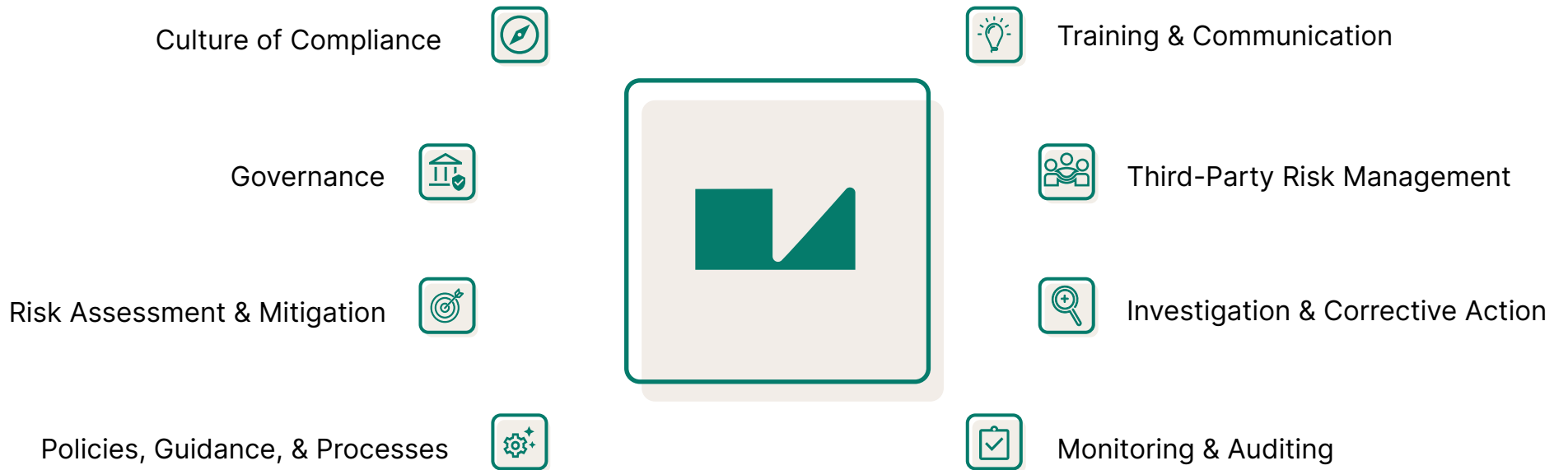
- [Verily Policy Against Modern Slavery](#)
- [Verily Supplier Code of Conduct and Verily Responsible Supply Chains - Employee Responsibilities Guidance](#)
- [Verily Gifts and Entertainment Policy \(Non-HCP and Non-Government\)](#)



# Compliance program statement

Verily's Trust & Compliance program is tailored to support our shared commitment across the company to a culture of compliance, ethics, and integrity. Given the complexity of navigating the healthcare and technology space, we enable Verily's success by partnering with the business to provide effective, ethical, and practical advice, solutions, training, and guidance. We respond to concerns, assist with identifying and monitoring areas of risk, and help leadership hold all of us accountable for ethical business conduct.

We are focused on continuous improvement through the following key elements of our program:



Resource	Contact
Verily Ethics Hotline <ul style="list-style-type: none"> <li>Raise a concern or ask a question</li> </ul>	Website: <a href="https://www.verily.com/go/verily-hotline">go/verily-hotline</a> Call: 1-800-259-8129 (US) Text: 1-650-376-7423 (US)
Verily Policies	<a href="https://www.verily.com/go/verily-policies">go/verily-policies</a>
Verily Member & Patient Success (MPS) <ul style="list-style-type: none"> <li>Product complaints or adverse events</li> </ul>	Email: <a href="mailto:mpsuccess-leads@google.com">mpsuccess-leads@google.com</a>
Trust & Compliance	<a href="https://www.verily.com/go/verily-trust">go/verily-trust</a>
PACT	<a href="https://www.verily.com/go/verily-pact">go/verily-pact</a>
Legal	<a href="https://www.verily.com/go/verily-legal">go/verily-legal</a>
REWS	<a href="https://www.verily.com/go/verily-rews">go/verily-rews</a>
Privacy & Information Security	Email: <a href="mailto:prisec@verily.com">prisec@verily.com</a>
Government Affairs	<a href="https://www.verily.com/go/verily-legal">go/verily-legal</a>
Quality & Regulatory Affairs	<a href="https://www.verily.com/go/verily-quality">go/verily-quality</a>

