



COMPLIANCE PROGRAM SUMMARY

OUR COMPLIANCE PROGRAM

Consistent with our Code of Business Conduct and Ethics, (“Code of Conduct”) the goal of the Summit Compliance Program is to: (a) prevent, detect, and resolve potential violations of law and Company policy and procedures; (b) ensure the establishment of compliance related policies and procedures for business operations; (c) provide oversight for the development of training and other programs designed to educate employees regarding applicable policies, standards and codes; (d) implement a mechanism to evaluate the effectiveness of our compliance program; (e) implement a mechanism for internal reporting to enable timely investigation and resolution; and (f) ensure appropriate corrective action is taken to prevent recurrence of misconduct.

LEADERSHIP AND STRUCTURE

The interim Corporate Compliance Officer is responsible for overseeing all aspects of the Summit Compliance Program, including, but not limited to, fielding questions or concerns with respect to potential violations of the Code of Conduct; developing and conducting periodic training on key areas of risk; developing and implementing monitoring systems; providing channels for employees, suppliers, agents, and customers to report suspected legal and ethics violations; and reporting compliance and ethics activities and issues as appropriate. The interim Corporate Compliance Officer leads the compliance program and promotes leadership and oversight through the Executive Compliance Committee.

WRITTEN STANDARDS

We have implemented policies and procedures that provide Summit personnel with direction in their day- to-day activities including, but not limited to, our Code of Conduct. Additionally, we have adopted relevant industry associations’ guidelines and codes.

EDUCATION AND TRAINING

A critical element of our compliance program is the live and online education and training of all Summit personnel and contractors on our policies and procedures. In addition to regularly scheduled training sessions, Summit personnel receive business and company relevant training during our Summit University live sessions.

INTERNAL LINES OF COMMUNICATION

We are committed to fostering effective lines of communication that encourage an environment of open communication about our Code of Conduct, company policies, or our business practices. There are multiple channels for raising and reporting compliance concerns: (1) Our Open-Door approach; where Summit personnel, and contractors are encouraged to have discussions with their managers, the compliance office or members of the senior leadership team about potential violations of company policies or procedures without the fear of retaliation; and (2) Web-Reporting Tool; where Summit personnel are able to report areas of concern 24 hours a day, 7 days a week, 365 days a year.

Web-Reporting Tool	
Website-Global	https://www.whistleblowerservices.com/smmt
Compliance Contact Information	
Compliance Office	<p>Mailing Address:</p> <p>2882 Sand Hill Road Menlo Park, CA 94025 United States</p> <p>Email Address:</p> <p>Compliance@Summitplc.com</p> <p>Direct Telephone Numbers:</p> <p>UK: +44 1235 608884 US: (650) 761-6414</p>

AUDITING AND MONITORING

Another vital aspect of our compliance program is the monitoring, and auditing of compliance with Company policies and procedures. The extent and frequency of the monitoring and auditing activities varies according to a variety of factors, including new regulatory requirements, changes in business practices, and other considerations.

RESPONDING TO POTENTIAL VIOLATIONS

Our Code of Conduct reminds all Summit personnel that failure to follow applicable laws, regulations, guidelines, policies, and procedures may have disciplinary consequences, up to and including termination of employment. If an investigation suggests that discipline may be warranted, appropriate action is taken. Consistent with company policy, Summit prohibits retaliation against personnel who report or seek guidance on possible ethical or compliance issues in good faith.

PROMPT RESPONSE AND CORRECTIVE ACTION

Compliance concerns referred through any of the many communication channels (email, Compliance Helpline, etc.) or as a result of our monitoring and auditing activities will be carefully reviewed, thoroughly and thoughtfully investigated in a timely manner, and appropriately resolved. Upon conclusion of an internal investigation, corrective action and preventative measures will be determined and implemented as appropriate.