

Corporate Code of Business Conduct and Ethics

Simulations Plus, Inc.

Simulations Plus is involved in business that is intended to help people, through our products and services that serve the pharmaceutical science and academic community. Serving these customers while providing a fair return on investment for our stockholders and a safe and positive working environment for our employees requires that we conduct every aspect of our business with honesty and integrity.

This Corporate Code of Business Conduct and Ethics (“Code”) sets out the basic standards to be followed by all our employees, contractors and vendors to ensure that their daily actions on behalf of the Company are honest and ethical.

1. Honesty and Integrity

Everyone must conduct the Company's business with honesty and integrity. Our employees and company affiliates should act in a professional manner that protects the Company’s good public image and reputation.

2. Comply with the Law

Our commitment to integrity begins with complying with laws, rules and regulations applicable to our business. If we are unsure of whether a contemplated action is permitted by law or Simulations Plus policy, we should seek the advice from the resource expert. We are responsible for preventing violations of law and for speaking up if we see possible violations.

3. Working Environment

It is important to Simulations Plus that relationships with customers, vendors, and fellow employees are based on trust, and that we treat every individual with respect and dignity in the conduct of Company business. Simulations Plus is an equal employment/affirmative action employer and is committed to providing a workplace that is free of discrimination of all types and from abusive, offensive or harassing behavior.

4. Privacy and Data Protection

We must always respect the confidential information of the Company and its vendors and customers. Integral to Simulations Plus’s business success is our protection of confidential Company information, as well as nonpublic information entrusted to us by employees, customers and other business partners. Confidential and proprietary information includes such things as nonpublic information about Company’s technologies and services, pricing and financial data, customer names/addresses, or nonpublic information about other companies, including current or potential supplier and vendors. We will not disclose confidential and nonpublic information without a permitted valid business purpose and proper authorization.

5. Insider Information

Employees who have access to confidential information may not use that information for any purpose other than our Company business. Company information may not be used for any personal financial benefit. Our insider trading policy outlines this information for all employees.

6. Corporate Recordkeeping

We create, retain and dispose of our Company records as part of our normal course of business in compliance with all regulatory and legal requirements. All corporate records must be true, accurate and complete, and Company data must be promptly and accurately entered in our records and books in accordance with Simulations Plus's and other applicable accounting principles. We must not improperly influence, manipulate or mislead any unauthorized audit, nor interfere with any auditor engaged to perform an internal independent audit of Simulations Plus's books, records, processes or internal controls.

7. Responsible Use of Company Resources

Company resources, including time, material, equipment and information, are provided for Company business use. Nonetheless, occasional personal use is permissible as long as it does not violate specific Company policies, affect job performance or cause a disruption to the workplace.

Employees and those who represent Simulations Plus are trusted to behave responsibly and use good judgment to conserve Company resources. Managers are responsible for the resources assigned to their departments and are empowered to resolve issues concerning their proper use.

8. Conflicts of interest

We must avoid any relationship or activity that might impair, or even appear to impair, our ability to make objective and fair decisions when performing our jobs. Conflicts of interest can arise when an employee has interests that may make it difficult to perform Company work objectively. Examples of conflicts of interest can include being employed (you or a close family member) by, or acting as a consultant to, a competitor or potential competitor, supplier or contractor, regardless of the nature of the employment, while you are employed with Simulations Plus; hiring or supervising family members or closely related persons; serving as a board member for an outside commercial company or organization that competes with the Company; owning or having a substantial interest in a competitor, supplier or contractor, placing Company business with a firm owned or controlled by a Simulations Plus employee or his or her family; or accepting gifts, discounts, favors or services from a customer/potential customer, competitor or supplier, among other things.

Determining whether a conflict of interest exists is not always easy to do. Employees with a conflict of interest question should seek advice from management. Before engaging in any activity, transaction or relationship that might give rise to a conflict of interest, employees must seek review from their managers or the HR department.

9. Corporate Opportunity

No employee or affiliate may use Company property or information for improper personal gain, nor may they compete with the Company directly or indirectly.

10. Health and Safety

Simulations Plus is dedicated to maintaining a healthy and safe environment for all our employees, clients, vendors and visitors. We will maintain compliance with all applicable environmental and health and safety laws. Simulations Plus will also be a smoke free, violence free and drug free environment.

11. Human Rights

Simulations Plus has a commitment to Human Rights, ensuring that, in our day-to-day business practices, our business relationships, and in matters of employment we support the principles set forth in the United Nations International Bill of Human Rights, specifically the Universal Declaration of Human Rights, and the ILO Declaration on Fundamental Principles and Rights at Work.

12. Compete Fairly in the Marketplace

Simulations Plus is committed to competing solely on the merit of our products and services. We should avoid any actions that create a perception that favorable treatment of outside entities by Simulations Plus was sought, received or given in exchange for personal business courtesies

We must always comply with competition law in all countries where we do business including adhering to the regulations of the Foreign Corrupt Practice Act.

13. Accountability and Whistleblower Hotline

Everyone is responsible for knowing and adhering to the values and standards set forth in this Code. Simulations Plus will investigate all reported instances of questionable or unethical behavior. In every instance where improper behavior is found to have occurred, the Company will take appropriate action. We will not tolerate retaliation against employees who raise genuine ethics concerns in good faith.

Simulation Plus's confidential whistleblower hotline is available at 661-941-4200 extension 211 from the Lancaster office.

Simulations Plus takes seriously the standards set forth in the Code and violations are cause for disciplinary action up to and including termination of employment.

Reviewed and approved 11-12-2020