

# Illumina Code of Conduct

## Table of contents

<b>Introduction.....</b>	<b>3</b>
Who is covered by this code? .....	3
General principles to follow .....	3
Oversight of the code .....	4
Responsibilities of managers and supervisors .....	4
<b>How we conduct business .....</b>	<b>5</b>
Conflicts of interest .....	5
Compliance with law .....	7
Bribery and corruption .....	7
Relations with healthcare professionals and organizations .....	9
Patient advocacy .....	9
Public reporting .....	10
Fair competition .....	11
Business intelligence .....	11
Marketing and sales claims .....	12
Illumina's commitment to human rights .....	12
Working with suppliers .....	15
International trade compliance .....	16
Our responsibilities .....	16
<b>Product quality and safety .....</b>	<b>17</b>
<b>Corporate social responsibility .....</b>	<b>17</b>
Environmental sustainability .....	17
Government interactions and political activity .....	18

<b>Handling company assets and information.....</b>	<b>19</b>
Company assets and resources .....	19
Confidential information .....	20
<b>Handling insider information .....</b>	<b>20</b>
<b>Communications outside of the company .....</b>	<b>21</b>
Investment and financial community ...	21
Engaging with the media .....	22
Social media .....	23
<b>Our people .....</b>	<b>24</b>
Anti-discrimination .....	24
Anti-harassment .....	25
<b>Workplace environment, health, and safety .....</b>	<b>26</b>
<b>Illumina commitment to privacy .....</b>	<b>27</b>
<b>Additional responsibilities .....</b>	<b>28</b>
Reporting potential violations or concerns .....	28
Preventing retaliation .....	29
Enforcement of the code .....	29
Cooperating with Investigations .....	29
<b>Appendix.....</b>	<b>30</b>
<b>References.....</b>	<b>30</b>

## Introduction

At Illumina we are privileged to deeply impact the lives of many people. Patients trust their medical and health decisions to us, our customers trust us to power their research and reputations, and employees and partners trust us with their livelihoods. That trust has been earned through many years of challenging work. We work hard every day to keep this trust. To do that, we are committed to operating with the highest standards in everything that we do.

Illumina is committed to conducting its business in compliance with all applicable laws and regulations, and with the highest ethical standards. Based on this commitment, our Board of Directors has adopted this Code of Conduct that applies to all of our employees, consultants, temporary workers, officers, and members of the Board of Directors, regardless of location, seniority level, business unit, function, or region.

The Code is intended to promote honest and ethical conduct, compliance with applicable laws and regulations, and to ensure the protection of our business interests, including corporate assets and information. The Code does not summarize every applicable law or regulation nor does it, or can it, address every issue or situation in which ethical decisions must be made. Rather, this Code sets forth key guiding principles of business conduct that anyone who works at or with Illumina is expected to follow.

Please review the Code carefully and become familiar with its provisions. You are responsible for understanding the Code and how it affects your daily activities. If you have questions, you have an obligation to seek out answers.

If you see violations of this Code, Illumina policy, or applicable law, insist that they be resolved and report them internally for action and follow-up.

Following the Illumina Code of Conduct is a responsibility we all share— starting in my office and extending to every one of us. Together we are committed to being a company that reflects the best of Illumina, its people, practices, and purpose.

### Who is covered by this code?

This Code applies to all our employees, consultants, temporary workers, officers, and members of the Board of Directors, regardless of location, seniority level, business unit, function, or region (all, unless otherwise indicated, are referred to as “personnel” in this Code). Channel Partners must adhere to the Illumina Channel Partner Code of Conduct.

Vendors and business partners serve as an extension of the Company. They must adhere to the spirit of this Code and any applicable contractual provisions when working for the Company.

### Additional resources

Refer to:  
[Illumina Channel Partner Code of Conduct Policy](#)

### General principles to follow

Always follow these principles to make sure you are helping the company maintain the highest ethical standards:

- Comply fully with all applicable laws. When in doubt about the legality of an action, seek advice prior to proceeding.

- Know the information contained in this Code. You are expected to comply with this Code, and all policies and procedures that apply to your job responsibilities.
- Promptly complete all training activities assigned to you.
- Immediately report any concerns regarding possible violations of law, regulations, company policy, or this Code to your supervisor, human resources, or the legal department at [compliance@illumina.com](mailto:compliance@illumina.com). Concerns may also be anonymously reported through the Compliance & Fraud Prevention Hotline on the Internet through the anonymous hotline link found on the Insider Corporate Compliance Homepage. This website offers global toll-free phone numbers where good-faith concerns may be reported.
- Always cooperate and tell the complete truth when responding to an investigation or audit. Never alter or destroy records ever in response to an investigation or when an investigation is anticipated.

## Oversight of the code

We have established a Compliance Committee to direct and oversee our compliance activities, including administering this Code. The Compliance Committee is comprised of senior executives, one of which is our Chief Compliance Officer.

## Responsibilities of managers and supervisors

If you are in a position where you manage others, you also have the following responsibilities:

- Lead by example. Managers are expected to exemplify the highest standards of ethical business conduct.
- Help create a work environment that focuses on building relationships, that recognizes ethical conduct, and that values mutual respect and open communication.
- Be a resource for others. Communicate to your teams about how this Code and our policies and procedures apply to their daily work and what is required of them.
- Be proactive. Look for opportunities to discuss and properly address questions and challenging situations with others.
- Create an environment where everyone feels comfortable asking questions and reporting potential violations of the law, this Code, or Company policies and procedures. Never retaliate against those who in good faith raise issues or concerns.
- Never ask or pressure anyone to do something that you would be prohibited from doing yourself.
- Be aware of the limits of your authority and do not take any action that exceeds those limits. Delegate authority only where permissible and never delegate authority to any individual who you believe may engage in unlawful or unethical conduct.

Managers, meaning all supervisory personnel of Illumina, are an integral contact point for Illumina Personnel to report actual or suspected compliance issues. Managers are also responsible for monitoring the personnel they supervise.



As a manager, if you become aware of conduct that may violate the law, Company policies or procedures, or this Code, you are responsible for conveying the compliance concern to the Chief Compliance Officer or other senior members of the Compliance Department within forty-eight (48) hours.

## How we conduct business

It is up to each of us, every day, and in everything we do to hold ourselves to the highest standards and uphold our core values as we carry out our business.

### Conflicts of interest

A conflict of interest arises when personnel act or enter relationships that oppose the interests of the Company or interferes with their performance or independent judgment when carrying out their duties. Personnel and their immediate families may not take any action or have or enter any relationship that may create a conflict of interest without the prior review and approval by Compliance in accordance with the Company's Conflict of Interest Disclosure and Assessment Process ("Conflict of Interest Process"). Actual conflicts of interest require a waiver by the Chief Compliance Officer.

Although it is not possible to list every conceivable conflict, the following are examples of some common scenarios.

## **Improper personal benefits**

Conflicts of interest can arise when you or a member of your family, or someone with whom you have a personal relationship, receives improper personal benefits as a result of your position with the Company. To prevent such conflicts, you should avoid the receipt of any gifts, payments, compensation, loans, guarantees of personal obligations, or other significant benefits from any person or entity that does business or seeks to do business with the Company, including for example, suppliers, consultants, business partners, distributors, and customers. For additional details on business courtesies, please see the Providing and Receiving Business Courtesies, Gifts, and Honoraria Policy. Under no circumstance may you use Company property, information, or the influence of your position in the Company for improper personal gain.

## **Personal relationships**

Certain personal relationships (such as a close family or intimate relationship) between you and an employee of a competitor or an entity that does business with the Company, may create an actual or perceived conflict of interest. You are responsible for promptly reporting to your supervisor and Human Resources and obtaining Compliance review and approval in accordance with the Company's Conflict of Interest Process, if you are in any relationship that may constitute an actual or perceived conflict of interest.

## **Financial or employment interests in other businesses**

You may not have an employment, consulting, or other financial relationship with any other enterprise if that interest compromises, or appears to compromise, your loyalty or objectivity to the Company. For example, you may not be employed or retained as a consultant by an enterprise or business that competes with the Company. You may not be employed by, consult for, or own an interest in an enterprise or business that does business with the Company where you have any involvement in the decision to retain that business.

## **Report potential conflicts of interest**

You should use good judgment in deciding whether you are facing a potential conflict of interest or whether others may believe there is the appearance of a conflict of interest. If you are in such a situation, disclose it immediately to your supervisor and to Human Resources and obtain Compliance review and approval in accordance with the Company's Conflict of Interest Process.

## **Waivers of actual conflicts of interest**

All actual conflicts of interest require a waiver by the Chief Compliance Officer. Waivers of the conflict-of-interest provision of this Code for the Company's named executive officers and members of the Board of Directors may only be made by the Nominating and Corporate Governance Committee of the Company's Board of Directors.

## **Our responsibilities**

- Always make business decisions that are in the best interest of the Company.

## **Additional resources**

Visit:

[Conflicts of Interest Insider page](#)

Refer to:

[Providing and Receiving Business Courtesies, Gifts, and Honoraria Policy](#)

Corporate governance guidelines available at:  
[www.illumina.com](http://www.illumina.com)

Send questions to:

[compliance@illumina.com](mailto:compliance@illumina.com)

- Never take a business or investment opportunity for your personal advantage if you obtain information about that opportunity in the course of your duties with the Company.
- Always follow the Company's procurement policies and processes and obtain Compliance review and approval before engaging or directing business to suppliers or other business partners when you know they are owned or managed by your family members. Family members include spouses, children, parents, in-laws, siblings, and those living in your household.
- Always obtain prior approval from your supervisor and Human Resources before accepting any outside employment to be performed while employed by the Company. If secondary employment could create a conflict of interest, you must also obtain Compliance review and approval.
- Disclose to Compliance any ownership interest you have in a supplier or other business partner of the Company unless that ownership is through stock of a publicly traded company.
- Do not solicit any personal gifts, favors, entertainment, or services.
- It is never okay to accept gifts of cash or cash equivalents, such as gift cards from suppliers, customers, or other business partners.
- Obtain approval from your supervisor, Human Resources and Compliance before participating on any external committee, board, scientific advisory board, or council. Serving on an external board may also require CEO approval under the Company's Corporate Governance Guidelines.
- If you think you may have a conflict of interest or are in a situation that could be perceived as a conflict of interest, immediately report it to your supervisor and Human Resources and obtain Compliance review and approval in accordance with the Conflict-of-Interest Process.

## Compliance with law

You are required to follow high ethical standards and comply fully with both the spirit and the letter of all applicable laws and regulations. You must observe these standards when addressing the special requirements often associated with government transactions or when dealing with government officials, representatives, or agencies that regulate the markets in which we do business. Whenever a law or regulation is unclear or seems to conflict with either another law or any provision of this Code or other Company policy or procedure, you should seek clarification from your supervisor. If your supervisor is unable to assist, you should seek clarification from the Legal department.

## Bribery and corruption

We prohibit bribery and corruption in any form, including directly or indirectly giving, offering, accepting or authorizing bribes anywhere in the world. We comply with the anti-corruption laws of every country in which we conduct business. This includes laws prohibiting bribery of government officials and employees and employees of commercial organizations.

We do not offer bribes to government officials, health care professionals, or anyone else. No Company personnel, distributor, agent, sales Channel Partner, or other representative worldwide may directly or indirectly offer, promise, pay, give, or authorize the giving of any financial or other advantage, or anything of value, to any other person or organization, in order to exert improper influence over the recipient, induce the recipient to violate his or her duties, secure an improper advantage for the Company, or improperly reward the recipient for past conduct.

We expect all our business partners (e.g., distributors, agents, sales Channel Partners, and consultants) to maintain the same standards when acting on our behalf. We must never do anything through a third party that we are not allowed to do ourselves.

### **Our responsibilities**

- Do not give or accept bribes or kickbacks or any other kind of improper payments, which can include, for example, cash, gifts or anything else of value.
- Exercise caution before providing anything of value to a government official or health care professional and be sure to follow all applicable Company policies and local law.
- Consider our anti-bribery policy and procedures when selecting business partners and monitor their behavior.



## Relations with healthcare professionals and organizations

Many countries in which we do business have laws and regulations that prohibit or regulate certain payments, donations, and relationships with healthcare professionals (e.g., physicians, clinical laboratory directors) and healthcare organizations (e.g., hospitals, clinical testing laboratories). Our policy is to comply with all such laws and regulations. All personnel interacting with healthcare professionals ("HCPs"), or healthcare organizations ("HCOs") are required to be familiar with and abide by such laws and regulations as well as our policies.

### Our responsibilities

- Be familiar with the relevant laws, regulations, and Company policies and procedures governing your interactions with health care professionals and organizations and be careful to follow them.
- Never ask third parties to engage in activities that would violate Company policies.
- Comply with all record-keeping requirements and financial controls.
- Promptly report to your supervisor or the Compliance department any suspected violations of this policy by personnel or third parties doing business on our behalf.

### Healthcare provider-patient relationship

We respect the relationship, collaboration and trust that exists between patients and healthcare providers. We expect that healthcare providers will act with integrity and honesty and will place patients' welfare above their own personal, professional, or institutional interest. Healthcare providers should use Illumina services and products based exclusively on consideration for patients' medical needs. We will not engage with healthcare providers in a manner that could compromise the integrity of the healthcare provider-patient relationship.

### Clinical research

Our clinical studies are designed and conducted in accordance with all applicable laws, regulations, and standards. We adhere to the principles outlined in ICH E6 Good Clinical Practices, an international ethical and scientific quality standard for designing, conducting, recording, and reporting trials that involve the participants of human subjects or data.

### Patient advocacy

We seek meaningful engagement with individual patients and the groups that represent them ("patient advocacy groups") to build evidence and advocate for the positive impact of genomics utilization in the clinic. To achieve this, our engagement is based on four pillars:

- Shared purpose: Patient Advocacy is at the intersection of where our technology meets patients. We aim to create an environment of mutual understanding between our internal teams, external stakeholders and patient experience. By translating patient experience we develop common ethical foundations to improve access to genomics.

### Additional resources

Visit:

[Compliance Program Homepage on the Illumina Insider](#)

Refer to:

[Integrity Code for Interactions with Healthcare Professionals and Government Officials](#)



- Autonomy of patients and patient advocacy groups: We respect the right of patients to make autonomous decisions related to their healthcare and we support their independent agency to do so.
- Transparency: Our interactions with patients and patient advocacy groups are open and honest.
- Continuity: We value long-term collaborations with patients and patient advocacy groups. We work collaboratively to develop projects which contribute to building personal and organizational resilience. Our commitment is to build relationships of action and trust based on patient experience.

## Public reporting

Accurate information is essential to the Company so that we can make good business decisions, and externally so that customers, investors, and the government can accurately assess the Company. This is why we require that all of the Company's books and records be fair, accurate, timely, complete, and understandable.

This requires that we maintain the integrity of our accounting and internal control system, that all transactions are valid, accurate, complete and supportable, and that they are promptly recorded in the Company's books. Our reports and documents filed with or submitted to the Securities and Exchange Commission and the Company's other public communications shall include full, fair, accurate, timely, and understandable disclosure. All personnel are responsible for using their best efforts to ensure that the Company meets these requirements.

## Our responsibilities

- Always be truthful in making any records or reports for the Company. This requires that all statements be truthful, complete, and never misleading or inappropriately suggestive.
- All records and reports of the Company must accurately reflect the truth of the underlying transaction or event. Never record false sales or shipments, understate or overstate known liabilities and assets, or defer recording items that should be expensed.
- All financial records must conform both to generally accepted accounting principles and to the Company's systems of internal controls.
- Implement appropriate internal controls, including proper segregation of job duties, monitoring of business processes for unusual items or activities, and limiting and controlling access to Company resources.
- Report known or suspected fraudulent, illegal, or unethical activities, including for example, misapplication or theft of funds, impropriety with respect to reporting financial transactions, forgery or alteration of documents, misuse of Company confidential information.
- Only sign documents, including contracts, that you are authorized to sign and that you believe are accurate.
- Contact the Legal department if there is any doubt about the appropriateness of document retention or destruction of records.

## Additional resources

Visit:

[Compliance Program Homepage on the Illumina Insider](#)

Refer to:

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

## Additional resources

Visit:

[Legal Department Homepage on the Illumina Insider](#)

Refer to:

[Global Contracts Policy](#)

[Signature Authority Policy](#)

## Fair competition

Illumina welcomes fair market competition, which benefits the development of important industries, and we oppose actions that restrict lawful competition. We work to compete and succeed in a fair and honest marketplace. We do not engage in unethical, unfair, or illegal communications with any third party. We always deal fairly with customers, suppliers, competitors, and employees. We do not take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation, or any other unfair-dealing practice. We do not enter into formal or informal agreements with any third parties to engage in any anti-competitive behavior, including setting prices or dividing up customers, suppliers, or markets.

We comply with all laws related to competition, antitrust, and the gathering of third party business information.

To promote fair and honest competition, you should minimize contact with competitors and always avoid sensitive subjects, including those relating to competition between the Company and others.

## Our responsibilities

- Do not enter any formal or informal arrangements, understandings or agreements with competitors which fix prices, rotate or allocate bids, compare bids, boycott a supplier or customer, or allocate production, sales territories, products, customers, or suppliers.
- Consult the Legal department before allocating sales territories, products, or customers among distributors, sales agents, and other sales Channel Partners.
- Do not exchange information with competitors which might change the way the competitor behaves in the marketplace.
- Do not participate in any conversations with third parties that could be perceived as limiting competition. If a conversation on such a topic begins, immediately leave the meeting and report the incident to an appropriate supervisor or member of management.
- Ask the Legal department to review agreements with customers, distributors, sales agents and other sales Channel Partners, and suppliers that establish the resale price of a product, limit a customer's right to sell product, or condition the sale of products on an agreement to buy other Illumina products.
- Ask the Legal department to review instances where you propose to charge competing customers different prices for the same products.

## Business intelligence

Illumina strictly prohibits personnel from engaging in fraud, misrepresentation, deception or similar activities in connection with obtaining third party business information. Care should be taken when accepting or otherwise obtaining any such information. You should know and trust the sources of information and be sure that the information provided is not proprietary and is not protected by trade secret laws or confidentiality agreements.

## Additional resources

Visit:

[Legal Department Homepage on the Illumina Insider](#)

### **Our responsibilities**

- Obtain business information of third parties only through legal and ethical means; do not engage in fraud or misrepresentation or other similar activities in order to obtain such information.
- Independently verify any claims by third parties that they obtained business intelligence properly and that the claims are not subject to obligation of confidentiality.
- Respect the obligations of others, including current employees who were formerly employees of competitors, to keep sensitive information of their former employers' confidential.
- Maintain the confidentiality of any business intelligence received under obligations of confidentiality.

### **Marketing and sales claims**

The claims we make about our products must be truthful, not misleading, and substantiated. All information we provide to our customers, including those that are involved in providing healthcare services, about our products must be consistent with the applicable label, intended use, and consistent with local legal and regulatory requirements.

### **Our responsibilities**

- Represent our products and services fairly, truthfully, and accurately. Promote them only for their approved or intended uses.
- Do not create by statement, or omission, any misleading impressions in any advertising, marketing or sales materials, or in any presentations.
- Do not overstate the efficacy of our products, downplay or minimize the risks associated with our products, or make false or illegal claims about or comparisons to the products or services of a competitor.
- All advertising and promotional materials must adhere to our Advertising and Promotional Materials guidelines and policies.
- Do not use messages or marketing materials that have not been properly reviewed and approved following Company policy and procedure.

### **Illumina's commitment to human rights**

Illumina is committed to respecting human rights and treating every person with dignity and respect and expects its business partners to do the same.

Recognizing that only Governments have the authority to become a party to and be bound by international agreements, Illumina respects the fundamental principles contained in the International Bill of Rights (i.e., United Nations Universal Declaration of Human Rights, International Covenant on Civil and Political Rights, and International Covenant on Economic, Social, and Cultural Rights), the International Labor Organization's Declaration on Fundamental Principles and Rights at Work, and the United Nations Guiding Principles on Business and Human Rights. As a member of the

#### **Additional resources**

Contact Ethics and Human Rights team:  
[HumanRights@illumina.com](mailto:HumanRights@illumina.com)

Refer to:  
[Illumina's Commitment to Human Rights](#)



United Nations Global Compact, Illumina is committed to integrating these principles into our strategy, our culture, our operations and our relationships with business partners.

Key Commitments of Illumina Human Rights Policy include Ethical Business Conduct; Protection of Privacy; Supplier Code of Conduct; Safe Workplace; Right to Exercise Freedom of Association; Elimination of Child, Forced Labor and Human Trafficking; Equal Opportunity and Non-Discrimination and Fair Wages and Working Hours.

### **Elimination of child labor, forced labor, and human trafficking**

- Illumina condemns all forms of exploitation of children.
- Illumina will not use child labor and supports the elimination of exploitive child labor.
- Illumina supports the elimination of all forms of forced, bonded, indentured, involuntary prison labor, and human trafficking.
- Illumina will never knowingly use a supplier, contractor, vendor, Channel Partner, business partner, etc. engaged in child, forced, or slave labor, nor will we condone such practices.

## Equal opportunity and non-discrimination

- Illumina is committed to the elimination of discriminatory practices in employment.
- We are committed to the fair and respectful treatment of all employees.
- We are committed to and promote equal opportunity in the workplace and in all aspects of our business operations.
- We will provide employment and advancement opportunities to individuals based on merit, qualifications, and abilities, and will not tolerate acts of discrimination.
- Our policies prohibit discrimination based on race, national origin, ancestry, color, ethnicity, citizenship status, age, sex, sexual orientation, pregnancy and related medical conditions, marital status, gender, gender identity and expression, religion, creed, physical or mental disability, medical condition, genetic information, military or veteran status, as well as any other status protected by applicable law.



## Safe workplace

- Illumina maintains a healthy, safe, and productive work environment that seeks to foster a culture of care throughout our operations.
- Our Injury and Illness Prevention Program and Environment Health and Safety (EHS) Management System Policy proactively manage risk and engage employees.
- We are committed to creating a work environment free from violence and harassment of any kind that threatens, intimidates, or coerces another person.

## Working with suppliers

The Company builds relationships with suppliers, vendors, and other third parties who share our commitment to satisfying all legal and ethical obligations. We will not knowingly do business with suppliers who employ underage individuals, employ forced labor, or use corporal punishment to discipline employees, regardless of whether such practices are permitted by applicable law. We will favor competitive suppliers who are proactive in contributing to the continued education and betterment of employees and who provide equal employment opportunity. We expect our suppliers to comply with the standards of behavior included in the Supplier Code of Conduct: Illumina Integrity Guide for Suppliers, Contractors and Consultants.

### Additional resources

Refer to:  
[Global Contracts Policy](#)



## Our responsibilities

- Document all supplier relationships in appropriate written contracts.
- Discuss our Code and expectations for legal and ethical conduct with all suppliers. Perform due diligence when choosing business partners to ensure that they meet our standards.
- Be vigilant for any signs that third parties are violating legal or ethical requirements, including local environmental, employment, and safety laws. Suppliers are expected to align with Illumina's Human Rights Policy, including by upholding international human rights and labor norms.
- Respect and protect the confidential and proprietary information of our suppliers.
- Suppliers are expected to align with Illumina's Supplier Code of Conduct as we seek to work with business partners committed to sustainable, equitable, and responsible practices.

## International trade compliance

Various laws and regulations govern trade across borders and with foreign nationals, including regulations designed to ensure that transactions do not involve restricted products or services, sanctioned countries or persons, or that products or services are not being used for unauthorized end-uses. Trade Compliance laws apply to any international shipment regardless of quantity, type of material, or mode of transportation, including free of charge shipments. Other laws prohibit companies from cooperating with unsanctioned boycotts or providing foreign nationals with protected intellectual property. We are committed to complying with all applicable laws and regulations.

## Our responsibilities

- Seek guidance from the Global Trade Compliance department to ensure that international shipments of products, sharing and/or transmissions of technical data or technology, software and source code, and delivery of services comply with trade compliance laws.
- Obtain export-import licenses and permits when required.
- Maintain required import, export, and customs records.
- Know customers and other business partners with whom we deal and ensure that we do not deal with any sanctioned parties or embargoed countries unless authorized to do so.
- Evaluate if there are any abnormal circumstances ("Red Flags") in a transaction that indicate that the shipment may be destined for an inappropriate end-use, end-user, or destination.
- Help prevent and detect money laundering and terrorist financing by watching for any suspicious payments, which may include cash or the equivalent (when checks are the norm); payments made from personal accounts instead of business accounts; and funds from financial institutions or third parties without a logical relationship to the customer or business partner.
- Identify potential boycott requests and seek guidance from the Global Trade Compliance department on how to respond.

## Product quality and safety

We have legal and ethical obligations to ensure that our products are safe and reliable throughout their lifecycle. The safety and well-being of our customers and patients is a top priority. We ensure that our products meet applicable laws, regulations, and standards.

### Our responsibilities

- Be vigilant to the quality and safety of our products and their supply chain, installation, and servicing.
- Consistently deliver products and services that meet customer and applicable requirements and identify improvements as described in the Illumina Quality Policy and Quality Manual.
- Report complaints and concerns about product quality or safety, or potential adverse events resulting from the use of our products and services you hear of immediately to [techsupport@illumina.com](mailto:techsupport@illumina.com).

### Additional resources

Refer to:

[Illumina Quality Manual](#)

[Illumina Quality Policy](#)

## Corporate social responsibility

At Illumina, we are driven by the power of genomics to positively impact the world and shape a more sustainable and equitable future for all. Illumina's Corporate Social Responsibility (CSR) vision is to deepen our impact on human health by serving as a champion for patients, our communities, our people, and our planet.

Our CSR efforts prioritize action around the most material environment, social, and governance (ESG) themes to deliver the greatest positive impact to our business, our stakeholders, and the planet.

We organized our CSR strategy around the following focus areas: Accelerate Access to Genomics, Nurture our People and Communities, Integrate Sustainability, and Operate Responsibly.

### Additional resources

[Corporate Social Responsibility Policy](#)

[EHS Management System Policy](#)

[Climate Change Position Statement](#)

[CSR webpage](#)

## Environmental sustainability

We are committed to integrating environmental stewardship into the fabric of how we operate. Human health and the health of our environment are intertwined, connecting our mission with our commitment to operate responsibly and sustainably. Our approach to environmental sustainability prioritizes taking action on climate change and the implementation of sustainable solutions in our facilities, products, and across our value chain. We are committed to meeting or exceeding applicable environmental laws and regulations and to continuously improving our environmental performance.

### Our responsibilities

- Understand and follow all applicable environmental laws, regulations, company policies and procedures.
- Respect and protect the environment by conserving natural resources, reducing greenhouse gas emissions, reusing and recycling materials, and minimizing and eliminating waste.

- Enhance sustainability during development and design of new products, processes, and facilities.
- Identify and manage environmental risk and opportunities throughout our value chain.
- Engage with our suppliers, customers, and partners to reduce our collective environmental impact and unlock solutions to decarbonize our value chain.

## Government interactions and political activity

We are committed to dealing with governments, governmental agencies, and public officials according to the highest ethical standards and in compliance with all applicable laws.

We respect the rights of individuals to voluntarily participate in the political process; however, you must always make it clear that your views and actions are your own and not those of the Company. Do not use Company resources to support your personal choice of political parties, causes, or candidates.

### Our responsibilities

- Any lobbying activity, political, or government contacts on behalf of the Company must be coordinated with the Government Affairs department.
- Obtain prior approval of the Government Affairs department before committing the Company to any corporate political spending, including donating products, services, transportation or facilities to politicians or political organizations.
- Holding or campaigning for political office must not create, or appear to create a conflict of interest with your duties at the Company.

### Additional resources

Refer to:  
[Anti-Bribery and](#)  
[Anti-Corruption Policy](#)



- You must be clear when expressing personal political activities or engaging in political activities that you are not acting on behalf of the Company.
- Never pressure a co-worker to contribute to, support, or oppose any political candidate, party, or political effort.
- Never make a political or charitable contribution with the intent to improperly influence someone or gain inappropriate advantages for the Company.

## Handling company assets and information

We all have an obligation to protect the Company's assets, including information, and ensure their efficient use. Company assets and information should only be used for legitimate business purposes of the Company.

Additional resources

Refer to:

[Global Security Policy](#)

[Acceptable Usage Policy](#)

### Company assets and resources

All personnel are responsible for using good judgment to ensure that our assets are not lost, stolen, misused, or wasted. Company assets include, but are not limited to, company issued mobile devices, laptop or desk top computers, corporate business opportunities, financial resources, physical facilities and equipment, applications such as the mail and ERP system, intellectual property, our confidential information, information of our customers and business partners, our files and documents, as well as inventory, computer networks, and supplies. Due to data privacy and security concerns, you must be especially careful with portable electronics such as laptop computers and mobile devices.

Information created, accessed, transmitted, or stored using Company provided technology resources, such as email messages, computer files, telephone messages, or websites in your browsing history, are Company resources and assets. To the extent permitted by law, we may access, monitor, or inspect any Company resources, assets, and property at any time without prior approval or knowledge or your consent. This includes monitoring and retrieving information stored or transmitted on Company electronic devices, computer equipment, applications, and systems.

### Our responsibilities

- Use Company assets, resources, and property only for legitimate business purposes.
- Use appropriate care to prevent theft or loss of Illumina property.
- Report any suspicions you have regarding theft, embezzlement, misuse, or misappropriation of any Company property immediately.
- Limited personal use of Company provided information technology resources (i.e., your Company issued laptop and/or phone) is permitted if it has no adverse effect on productivity or the work environment.
- Other Company assets, resources, and property are limited to business use (i.e., cameras, furniture, equipment, etc).

## Confidential information

Our confidential and proprietary information is a valuable Company asset. Except as required for the proper performance of your duties to the Company, you may not use or give to others trade secrets or confidential information of the Company or of our business partners, including suppliers, customers, and other business partners. Confidential information includes, for example, any information not known to outsiders or the premature disclosure of which would help competitors or be otherwise harmful to the Company.

Confidential Company information includes, but is not limited to business plans, Company financial information, intellectual property including patents and trade secrets, sales and profit figures, pricing, new product or marketing plans, research and development ideas, manufacturing processes, information about potential acquisitions, divestitures and investments, employee files and compensation data, and information of third parties they have given to us in confidence.

Each of us must protect our confidential information. This means keeping it secure from entities outside the Company, limiting access within the Company to those who have a need to know to do their job, and avoiding discussion of confidential information in public areas, including not sharing Company information with market research firms.

The obligation to preserve the Company's confidential information is ongoing and extends even after employment ends.

## Our Responsibilities

- Use and disclose confidential information only for legitimate business purposes.
- Do not leave confidential information unattended on fax machines or printers.
- Avoid discussing confidential information where others might be able to overhear.
- Store all confidential information using our designated information technology resources.
- Mark documents containing confidential information with a clear and conspicuous confidentiality statement.
- Secure confidential information when not in use—store only in company approved locations to include cloud or physical shared drives/folders. Storing company confidential information on laptop C:Drives is to be avoided and do not leave printed materials out on your desk. Lock your computer when you are away.

## Handling insider information

Non-public information may not be used for personal benefit, including in trading our securities or the securities of other companies. You are prohibited from trading securities of any company when you possess material, non-public information about that company.

You are also prohibited from “tipping” – which is passing material, non-public information to others who might then buy or sell securities before the information is made publicly available to ordinary investors.

### Additional resources

Refer to:  
[Global Security Policy](#)

Visit:  
[Legal Department Homepage on the Illumina Insider](#)

### Additional resources

Refer to:  
[Insider Trading Policy](#)

Information is “material” if there is a substantial likelihood that a reasonable investor would find it useful in deciding whether to buy, sell, or hold securities. This can include information about acquisitions, financial results, management changes, and information about a company’s financial performance. The information is “non-public” if it has not been released publicly.

### Our responsibilities

- Do not buy or sell Company securities or the securities of any other company when you are in possession of material, non-public information about the Company or such other company.
- Do not communicate material, non-public information externally or internally with other personnel unless they need to know such information to carry out their job duties.
- Be careful not to engage in “tipping” - even if a conversation seems casual, make sure not to disclose confidential information about the Company or our business partners.
- When in doubt about whether the information is material or non-public, refrain from trading in Company stock until you have consulted our Insider Trading Compliance Officer, as identified in our Insider Trading Policy.

## Communications outside of the company

To ensure that the Company speaks with a clear, consistent voice when providing information to the public and media, only authorized persons may speak on behalf of the Company.

Never give the impression that you are speaking on behalf of the Company in any communication that may become public if you are not specifically authorized to do so.

If you receive an inquiry regarding the Company’s activities, financial results, business plans, or position on public issues and are not specifically authorized to respond, refer the request to our Public or Investor Relations departments, as applicable.

### Additional resources

Contact the investor relations department at [ir@illumina.com](mailto:ir@illumina.com)

## Investment and financial community

Only the CEO, CFO, Investor Relations department, or other persons specifically authorized by the Investor Relations department may communicate with the investment community, including institutional and retail investors, and sell-side analysts. This is to protect the Company and its confidential information and to comply with applicable laws.

### Our responsibilities

- Do not attend meetings with the investment community, unless specifically authorized to do so.
- In the event you are at a conference, customer event, or other event where members of the investment community are present, your interactions with the investment community should be limited to answering product specification or technology-related questions. Other questions that relate to product pricing, discounts or other promotions, launch timing, sales volumes, or other information that could have a

financial impact on the company, should be strictly limited to information that Illumina has previously publicly announced or otherwise formally disclosed.

- Never share Company confidential information publicly, unless expressly authorized to do so.
- Refer questions from investors or analysts to the Investor Relations department.

## Engaging with the media

Only the Public Relations department or employees working through the Public Relations department may communicate with members of the media, including, for example, industry trade press, general business press, broadcast radio and television news outlets, online news outlets, special interest magazines, and journalistic blogs.

### Additional resources

Contact the Public Relations department at [pr@illumina.com](mailto:pr@illumina.com)

Contact the Social Media department at [socialmedia@illumina.com](mailto:socialmedia@illumina.com)



## Our responsibilities

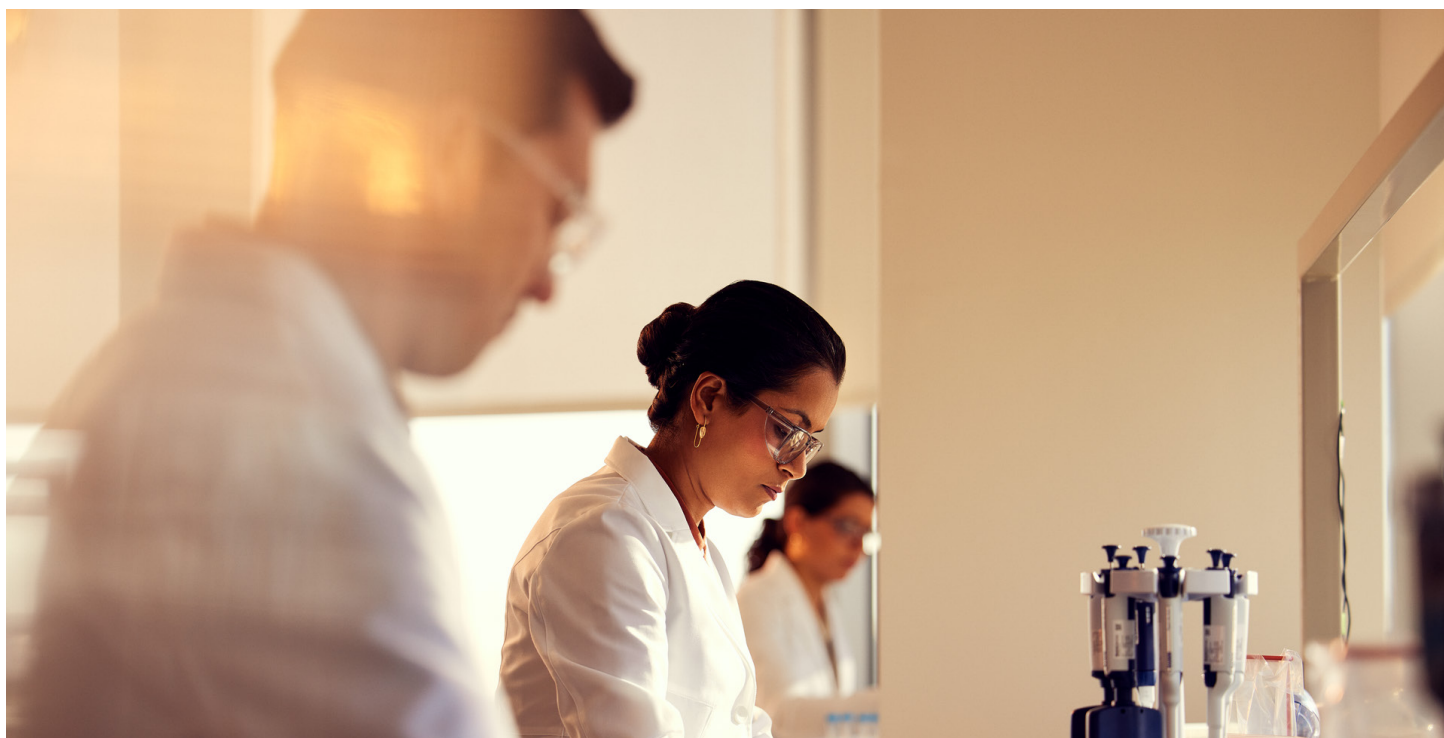
- Obtain approval from the Public Relations department before making public speeches, writing articles for professional journals, or engaging in other public communications when you are speaking on behalf of or representing the Company.
- Inform the Public Relations department in advance about all interactions with the media, and do not interact with the media until approved by the Public Relations department.
- Refer questions from reporters, bloggers, or other members of the media to the Public Relations department.
- Let the Public Relations department know about any articles that misrepresent the Company or contain inaccurate information.
- Contact the Public Relations department at [pr@illumina.com](mailto:pr@illumina.com).

## Social media

- In external interactions, we must be mindful of whether we can be identified as affiliated with the Company, and consider how any statements, especially those related to our work, may reflect on the Company. This is especially crucial in the context of social media where interactions are quick, dynamic, and may become highly visible. Careless communications can pose a significant risk to our reputation. As a result, only designated people are permitted to post to social media on behalf of the Company.

## Our responsibilities

- Do not give the appearance that you are speaking on behalf of the Company when using social media for personal use.
- Never share or post the Company's confidential information or the confidential information of our customers, suppliers, or other business partners.
- Only the Social Media department is authorized to initiate and manage a new social media account on behalf of the Company.
- If you are authorized to post on the Company's social media accounts, you must follow the Company's Social Media Guidelines and have received social media training.
- Let the Public Relations and Social Media department know if you see anything on social media that could potentially be of concern for the Company.



## Our people

Everyone at Illumina is driven by the power of genomics to positively impact the world. We seek opportunities. We embrace challenges. We work tirelessly to move genomics and humanity forward.

We believe in the power of belonging. Our environment helps people engage at their best, knowing they have an equal opportunity to grow and succeed based on their performance, fueled by their individual differences.

We strive to foster an innovative workplace, powered by passionate people, to deliver on the transformative power of genomics. Our culture is fueled by openness, collaboration, caring, and innovation. We value the wide range of experiences, talents, and backgrounds our employees bring to work every day. We recognize that diversity of backgrounds is valuable in the workplace. Illumina is focused on organically and programmatically cultivating an environment in which everyone fully contributes to our mission.

## Anti-discrimination

We promote equality of opportunity within the workplace, recognizing and valuing the contributions that individuals make. We are committed to fair and respectful treatment and equal opportunity in our employment decisions. Our colleagues and job applicants are entitled to respect and will be evaluated solely on the basis of their qualifications, demonstrated skills, and achievements.

### Additional resources

Contact [Human Resources](#) if you have questions or concerns.

Refer to:  
[Employee Handbook](#)

We are committed to the fair and respectful treatment of all employees, as well as promoting equal opportunity and diversity of experiences, talents, and backgrounds in the workplace and in all aspects of our business. Illumina provides employment and advancement opportunities to its applicants and employees based on merit, qualifications, and abilities. Our policies prohibit discrimination based on race, national origin, ancestry, color, ethnicity, citizenship status, age, sex, sexual orientation, pregnancy and related medical conditions, reproductive health decisions, marital status, gender, gender identity and expression, religion, creed, physical or mental disability, medical condition, genetic information, military and veteran status, as well as any other status protected by applicable law.

We believe that everyone deserves the opportunity to work in an environment that is free from unlawful discrimination. We understand that diversity in our Company generates creativity and innovation. Discrimination on the basis of race, national origin, ancestry, color, ethnicity, citizenship status, age, sex, sexual orientation, pregnancy and related medical conditions, reproductive health decisions, marital status, gender, gender identity and expression, religion, creed, physical or mental disability, medical condition, genetic information, military or veteran status, or any other characteristic protected by applicable law is strictly prohibited.

### Our responsibilities

- Treat others as you wish to be treated.
- If you manage others, or are involved in recruitment and hiring, review your own decisions to ensure that only objective merit and business considerations drive your actions.
- Expect others with whom you work, including outside of the Company, to act in a way that is consistent with our commitment to fairness and equal opportunity.
- Speak up immediately if you witness any individuals who are not observing this policy.

### Anti-harassment

We strive to build and maintain a workplace that is professional and free from intimidation, harassment, and abuse. Harassment for any reason and on any basis is prohibited. We expect employees to treat their colleagues with respect. We will not tolerate harassing, bullying, or disruptive behavior. Employees may never engage in verbal or physical conduct that may threaten, bully, intimidate, or harm another person. We do not tolerate threats or physical violence in the workplace. Any behavior that creates an intimidating, offensive, abusive or hostile workplace is prohibited at the Company.

One form of prohibited harassment is sexual harassment, which may occur when:

- A colleague makes requests for a date, sexual favor, or similar action as a condition of employment or as a basis for employment decisions.
- Unwelcome sexual advances, insulting jokes, or other offensive verbal or physical behavior of a sexual nature create an intimidating, offensive, or hostile work environment. This can include repeated but unwelcome requests for a date.
- The Company will not tolerate retaliation against employees who file good faith complaints of harassment, discrimination, or retaliation, or who participate in an investigation

### Additional resources

Refer to:  
[Employee Handbook](#)

### Our responsibilities

- If you see or hear a co-worker or other individual with whom you interact at work behaving in an inappropriate manner, state your concern to the person in a clear and direct manner if you feel safe doing so, and immediately report the incident to Human Resources.
- Sexual, racial, or other offensive jokes or comments are not appropriate in the workplace or at work events, whether spoken or written. Be aware of how your jokes or comments are received.
- Do not make statements that are disrespectful of a particular race, ethnicity, religion, sex, gender, gender identity, or other protected characteristic.

## Workplace environment, health, and safety

The health and safety of our workforce and protection of our environment is a top priority at the Company. We will comply with all applicable health, safety, and environment laws and regulations. We will continuously strive to prevent workplace injuries, illnesses, and environmental releases.

### Our responsibilities

- Proactively assess and manage health, safety, and environment risks.
- Understand and follow all applicable health, safety, and environment laws, regulations, Company policies and procedures. Expect that third parties and visitors do the same and assist them, as necessary.
- Immediately report to your supervisor or local Environment, Health, and Safety, ("EHS") department representative any injuries and illnesses at work, and any other issues (e.g., unsafe working conditions, potential non-compliance, unsafe behavior, etc.) that could impact health, safety, or the environment.
- Conduct ourselves in a safe and responsible manner.
- Assess health, safety, and environment impacts during the development and design of new products, processes, and facilities.
- Do not allow the use of alcohol, prescription or over-the-counter drugs, or any other intoxicant to interfere with your performance at work. If you are concerned about prescribed or over-the-counter medications, speak with your supervisor prior to starting work.
- Do not bring firearms or other weapons with you to work.
- Always display your identification key badge in clear view while on Company premises and always badge-in when entering our facilities.
- Complete and adhere to environmental, health and safety training.
- Work to reduce hazardous waste and manage in a safe, responsible manner to comply with applicable laws and regulations.

### Additional resources

Refer to:

[Privacy Insider Page](#)

[Privacy Principles](#)

[Privacy Policy](#)

[Employee Privacy Policy  
Handling Personal  
Data Policy](#)

[Information \(Data\)  
Retention Policy](#)

[Transparency Report](#)

## Illumina commitment to privacy

Protecting the privacy of personal data is a foundational principle of Illumina's business.

"Personal data" refers to information that identifies, relates to, describes, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular individual or household. Like confidential information, personal data requires special care.

Illumina manages personal data about our customers, employees, patients, business partners and other stakeholders. Maintaining the security and privacy of the personal data in our possession is integral to meeting our legal and ethical obligations and maintaining our reputation as a trustworthy company for our stakeholders. This includes adhering to applicable privacy and data protection laws, including medical privacy laws, as well as entering into agreements with customers, business partners and other stakeholders to govern the handling of personal data.

Across our business activities, Illumina is committed to handling personal data according to applicable laws and following fundamental Privacy Principles:

- Transparency
- Responsible stewardship
- Ethical use
- Accountability

You are required to follow all Company policies and procedures regarding the collection, use, transfer, storage, or disposal of personal data. This helps create an environment of trust and integrity and enables the Company to comply with applicable data protection and privacy laws.

### Your responsibilities

#### Think first, act right

Use common sense to make responsible choices to protect the personal data you use. Don't be afraid to challenge the status quo!

#### Need to know, right to share

Only share personal data with individuals, including other Illumina employees, who have a legitimate business need to access or use the personal data, and make sure you have the right to share the personal data.

#### Minimum necessary

Only access or share the minimum amount of personal data that is necessary to accomplish the business task at hand. If you can limit how much personal data is used or shared, do so.

## See something? Say something!

If you see misuse of personal data, receive a privacy complaint, or if something does not look right, contact the Ethics & Privacy Team at

[privacy@illumina.com](mailto:privacy@illumina.com) and the GIS Information Security Team at [infosec@illumina.com](mailto:infosec@illumina.com)

## Stay informed

Keep up to date on your trainings. Regulations require regular training on data privacy and security.

# Additional responsibilities

## Reporting potential violations or concerns

Everyone is responsible for promptly reporting any violations of applicable law or regulations, this Code, as well as of any Company policies and procedures. Generally, every effort will be made to maintain the confidentiality of reports about potential violations; however, depending on the circumstances, it may not be possible to protect the identity of the person making the report.

You have several options to report potential violations:

- Speak with your manager or the Human Resources department. Managers and Human Resources department personnel that become aware of conduct that may violate the law, Company policies or procedures, or this Code are responsible for conveying the compliance concern to the Chief Compliance Officer or other senior members of the Compliance Department within forty-eight (48) hours.
- You may submit concerns to the Compliance Department via email at [compliance@illumina.com](mailto:compliance@illumina.com).
- You may submit concerns directly to the Chief Compliance Officer or other senior members of the Corporate Compliance Department.
- You may also submit a concern via the third-party managed Compliance and Fraud Prevention Hotline
  - By Internet through the anonymous hotline link found on the [Insider Corporate Compliance Homepage](#).
  - By calling one of the global toll-free phone numbers available at that website.

Reports made through the Compliance and Fraud Prevention Hotline may be made anonymously unless prohibited by local law.

**Everyone has an obligation to report violations.** Not reporting a violation when you know about it may result in discipline up to and including termination of employment.

## Preventing retaliation

To ensure legal compliance and build trust, we must listen openly to concerns that our personnel bring to our attention, respond appropriately, and must never retaliate against any individual in connection with an issue or concern raised in good faith.

Anyone reporting a concern must act in good faith and have reasonable grounds for believing the information disclosed indicates a violation of law and/or Company Policy. Any unfounded allegation that proves to have been made maliciously, recklessly, or knowingly to be false will be viewed as a serious offense and result in disciplinary action up to and including termination of employment.

We take claims of retaliation seriously. All such claims will be investigated and, if substantiated, retaliators will be disciplined up to and including termination. If you believe you have been retaliated against, you should report such action immediately to Human Resources.

## Enforcement of the code

We take the obligation to investigate reports of potential violations of law, non-compliance with Illumina's Code of Conduct and Corporate Policies, conflicts of interest, and unethical conduct very seriously. The Company is committed to impartially investigating all such reports where warranted, and to remediate any such violations in a fair and consistent manner.

## Cooperating with Investigations

It is the policy of Illumina to review, and if necessary, investigate all allegations of suspected or known violations of all applicable laws, regulations, this Code, and Company policy. Everyone covered by this Code is responsible for fully cooperating with any investigation being carried out by or on behalf of Illumina. You are expected to cooperate with investigations by:

- Promptly providing truthful accounts and relevant documentation in response to investigator questions and related information requests.
- Being available for meetings with the individuals conducting the investigation.
- Maintaining the confidentiality of the investigation, including keeping confidential the investigation's existence and any information transmitted during the investigation, unless directed by legal authorities.
- Preserving all relevant documents and information pertaining to the investigation.

Employees who fail to cooperate, or otherwise impede an internal investigation may be subject to disciplinary action, up to and including termination of employment. By cooperating with investigations, you ensure that Illumina continues to operate at the highest standards.

- If you are involved in an investigation, you should not discuss the investigation with others, unless the investigator explicitly says otherwise.
- You will not be retaliated against for your full participation in an investigation.

## Appendix

Only the following sections and subsections of the Code are deemed to be the code of conduct for the purposes of the listing standards of the NASDAQ or the code of conduct for senior officers under SEC rules:

- Conflicts of interest
- Compliance with applicable laws
- Public reporting
- Handling company assets
- Handling confidential company information
- Handling insider information
- Reporting potential violations

## References

The policies and procedures referenced in this Code are available in the Product Lifecycle Management (PLM) system or through the [ICE Corporate Policies and Procedures Portal](#).

[Acceptable Usage Policy \(300.05\)](#)

[Anti-Bribery and Anti-Corruption Policy \(CP500.05\)](#)

[Employee Privacy Policy \(CP1000.01\)](#)

[Global Contracts Review & Approval Policy \(CP500.09\)](#)

[Global Security Policy \(CP300.01\)](#)

[Handling Personal Data Policy \(CP1000.02\)](#)

[Illumina Channel Partner Code of Conduct Policy](#)

[Illumina Corporate Privacy Policy \(CP1000.01\)](#)

[Illumina Quality Manual \(Document #11204017\)](#)

[Insider Trading Policy \(CP500.02\)](#)

[Integrity Code for Interactions with Healthcare Professionals and Government Officials \(CP500.16\)](#)

[Providing and Receiving Business Courtesies, Gifts and Honoraria \(CP500.13\)](#)

[Illumina Quality Policy \(Document #15028065\)](#)

[Signature Authority Policy \(CP200.02\)](#)



1.800.809.4566 toll-free (US) | +1.858.202.4566 tel  
techsupport@illumina.com | [www.illumina.com](http://www.illumina.com)

© 2025 Illumina, Inc. All rights reserved. All trademarks are the property of Illumina, Inc. or their respective owners. For specific trademark information, see [www.illumina.com/company/legal.html](http://www.illumina.com/company/legal.html).

Document #1000000013327-1