

Policy Title: Integrity Code for Interactions with Healthcare Professionals and Government Officials (“Integrity Code”)

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| Policy Owner: Lacey Daugherty | Policy Interpreter(s): AMR, AMEA, Europe, and Greater China Regional Compliance Officers |

Purpose and Background

As a company that manufactures and sells products and services for medical and research use globally, Illumina is subject to laws, regulations and rigorous standards of conduct governing its interactions with Healthcare Professionals and Government Officials. Examples of these laws and regulations include, the United States False Claims Act, United States Federal, State, and international anti-kickback laws, physician gift ban laws, laws regulating government payment systems for healthcare, as well as the U.S. Foreign Corrupt Practices Act, the UK Bribery Act and other local anti-bribery and anti-corruption laws.

Repercussions for violating these laws and regulations can include multi-million dollar civil penalties, criminal penalties, government-imposed oversight and monitoring of our activities, disrupted relationships with regulators such as the U.S. Food and Drug Administration, which could impair our ability to obtain necessary regulatory clearance or approval of our in vitro diagnostic products, disruptions in our relationships with medical professionals, as well as reputational harm to the Company.

This Code establishes standards on how we at Illumina must conduct business with Healthcare Professionals and Government Officials in support of our business objectives while simultaneously ensuring our compliance with applicable laws, regulations, and standards of conduct. This Code also adheres to the principles found in various national and international medical device industry codes of conduct, including but not limited to, those of the Advanced Medical Technology Association (“AdvaMed”) and MedTech Europe.

Employees that fail to comply with this Code may be subject to disciplinary action up to, and including, termination of employment in accordance with Illumina’s Disciplinary Guidelines.

Scope

This Code applies to Illumina, Inc. and its subsidiaries and affiliates globally (collectively referred to as “Illumina”), including all the following.

- Employees of Illumina,
- Temporary workers of Illumina, and
- Third parties working on behalf of Illumina, including for example, contractors, consultants, distributors, resale agents, marketing agencies, and meeting/event planners.
- Channel Partners have a separate policy, the Illumina Channel Partner Code of Conduct.

This Code applies to interactions with Healthcare Professionals (“HCPs”) and Government Officials. Interactions with third parties that do not qualify as HCPs or Government Officials are governed by Illumina’s **Providing and Receiving Business Courtesies Policy (CP 500.13)**. To clarify, this policy does not apply to interactions with Agrigenomics professionals or entities under the following conditions:

- The professional/entity is not classified as a Government Official; or
- The individual is not affiliated with a Healthcare Organization; or
- The activity involves non-human subjects.

Definitions

| Term | Definition |
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| Advisory Board | A meeting convened by Illumina to obtain a third-party expert’s feedback, insights, or guidance on a product need, or medical, scientific, or business discipline. Advisory Boards must follow the Advisory Board Checklist which can be located in Appendix 3 of the Integrity Code. |
| Charitable Donation | Funding or in-kind support to registered charitable or non-profit organizations for charitable purposes. Charitable donations are provided for philanthropic purposes and not with the intention of receiving something of value in return. |
| Educational Event and Product Training | An educational event or training organized by Illumina and intended to provide education on genomics or training on the safe and effective use of Illumina products. |
| Educational Grants (Continuing Medical Education and other Professional Education) | Funding or in-kind product support to a third-party organization solely for the support and advancement of genuine scientific or medical education that is aligned with Illumina’s medical education priorities and objectives. |
| Educational Item or Medical Educational Item | Means “an item that serves a genuine educational function for an HCP or is intended for a patient, and is not capable of a non-educational, non-patient related purpose.” Examples of Medical Educational Items include medical or genomics textbooks, journal reprints, and prenatal due date and screening test calculators. Examples of items that do not qualify as Medical Educational Items include office supplies, headphones, scrubs, and iPads. |
| Entertainment | Means “an event or activity intended to entertain others.” Examples of entertainment include, but are not limited to, recreational activities, live music or concerts, sporting events, golf, theater, going out for drinks separate from a meal, and providing alcoholic drinks beyond a two-drink limit at any business event. |

| Term | Definition |
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| Gift | <p>Means “any item or in-kind benefit that is provided as an expression of appreciation or goodwill, without the obligation or expectation of anything in return.”</p> <p>Gifts are usually capable of personal use and include tangible items such as gift baskets and wine, as well as in-kind benefits such as travel and entertainment offered as a personal benefit. Travel, hotel accommodations, and meals provided as business courtesies in furtherance of legitimate business activities are not considered gifts.</p> |
| Government Official | <p>Means “any officer or employee of a foreign government or any department, agency, or instrumentality thereof, or of a public international organization, or any person acting in an official capacity for or on behalf of any such government or department, agency, or instrumentality, or for or on behalf of any such public international organization.”</p> <p>Examples of Government Officials include, but are not limited to:</p> <ul style="list-style-type: none"> • HCPs and non-HCPs employed by a hospital, clinic, university, research center, or other entity or institution that is fully or partially owned or funded by a government, • Elected or appointed government legislators and members of a government ministry, • Political party officers and candidates for public office, • Employees or individuals acting on behalf of a public international organization (e.g., IOC, World Health Organization, United Nations), • Member of the military, and • Members of a royal family. |
| Healthcare Organization | <p>Means “any legal entity or body that is a healthcare, medical or scientific association or organization which may have a direct or indirect influence on the prescription, recommendation, purchase, order, supply, utilization, sale or lease of medical technologies or related services such as a hospital or group purchasing organization, clinic, laboratory, pharmacy, research institution, foundation, university or other teaching institution or learned or professional society (except for patient organizations); or through which one or more Healthcare Professionals provide services.”</p> |

| Term | Definition |
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| Healthcare Professional or HCP | <p>Is defined in the Regional Addendum for the country where the HCP is licensed or employed. For countries without a Regional Addendum, HCP means “anyone that is:</p> <ul style="list-style-type: none"> • Authorized or licensed to provide healthcare services to patients (e.g., physicians, nurses, pharmacists, etc.), • Involved in providing healthcare services to patients (e.g., laboratory personnel, allied health professionals such as genetic counselors, etc.), • Involved in using a medical device for human use, or • Involved in the decision to purchase, prescribe, order, use or recommend medical devices, technologies, or related services.” <p>For clarity: (1) PhDs and other academics working at an institution or university with a hospital or medical center are HCPs because they are in a position to recommend Illumina products to their clinical colleagues; and (2) patient advocates are HCPs because they are engaged by Illumina to recommend our products.</p> <p>For purposes of this Integrity Code: (1) Any employee or temporary worker through an employment agency hired by Illumina is not considered an HCP; and (2) Except for purposes of tracking and disclosure of transfers of value, any person that is a Member of the Board of Directors of Illumina, Inc., is not considered an HCP.</p> |
| Illumina Internal Meeting or Event | <p>A meeting targeted to Illumina employees in which HCPs and/or Government Officials may be engaged to present Illumina’s products and services, genomics, and/or the life sciences industry generally.</p> |
| Legitimate Business Purpose | <p>Means “a presentation, discussion, activity or event for the purpose of: (1) the exchange of scientific, technical, or educational information related to Illumina products and services, (2) promotion, demonstration or explanation of Illumina products and services, or (3) the negotiation, execution, or performance of a contract between Illumina and a third-party.”</p> |
| Market Research Projects | <p>Means when Illumina engages a vendor and other third parties to interact with or pay HCPs or GOs on behalf of Illumina to obtain data and/or feedback for Marketing purposes (e.g., data provided is used to create an App Note, or sharing customer data and/or feedback for promotional purposes etc.).</p> |
| Promotional Item | <p>Means “a professional-use item that is intended for the promotion of Illumina’s products (e.g., Illumina branded items used in an office setting such as pens, mugs, backpacks, phone cases, notepads, calendars, diaries, and computer accessories for business use) or relates to an HCP’s practice” (e.g., clinical items such as wipes, nail brushes, surgical gloves).</p> |

| Term | Definition |
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| Promotional/Sales Meeting or Event | A meeting or event organized by Illumina and intended to promote or discuss features, specifications, and/or pricing related to Illumina products and services. |
| Research Collaborations | Funding or in-kind support for rigorous scientific or medical research conducted jointly by Illumina and a third-party that aligns with Illumina’s documented research and evidence generation priorities and objectives. |
| Research Grant | Funding or in-kind product support to a third-party organization solely for the support and advancement of scientifically rigorous independent scientific or medical research that is aligned with Illumina’s documented research and evidence generation priorities and objectives. |
| Satellite Symposium | An Illumina-organized and funded program that is appended to a Third-Party Organized Event agenda. These programs often take place during meal breaks at the Third-Party Event and may address education and training topics that coincide with the Third-Party Event’s focus. |
| Sponsorship | Funding or in-kind support to an organization or for a third party organized educational or charitable event in return for access to the commercial potential associated with that organization or event (e.g., advertising space, promotion of products and services, attendance at dinners or recreational events, etc.). |
| Third-Party Organized Events | Educational or scientific meetings, congresses, tradeshow, academies, conferences, or any other forums for HCPs and/or Government Officials, that are not run or organized by Illumina which address genomics, medical conditions, disease states, therapies, or treatments for which Illumina's products may be used. |
| Transfer of Value | Means “a transfer of any form of value or benefit, tangible or intangible, from Illumina to a Healthcare Professional, Healthcare Organization, or Government Employee.” A Transfer of Value can be made directly from Illumina or indirectly via an intermediary and can be monetary (such as a fee for service) or non-monetary (such as a gift, meal, travel/accommodations, and no charge products or services). |

References and Related Policies

| Policy or Document Title | Policy or Document Number |
|---|---------------------------|
| <i>Illumina Code of Conduct</i> | CP 500.01 |
| <i>Anti-Bribery and Anti-Corruption Policy</i> | CP 500.05 |
| <i>Providing and Receiving Business Courtesies Policy</i> | CP 500.13 |
| <i>Grants and Collaborations Policy</i> | CP 500.14 |
| <i>Engagement of Healthcare Professionals and Government Officials Policy</i> | CP 500.17 |
| <i>Global Travel and Expense Reimbursement Policy</i> | CP 200.14 |
| <i>Sponsorship Policy</i> | CP 600.03 |
| <i>Corporate Donations Policy</i> | CP 900.01 |

Policy

1 General Requirements for all Interactions with and Transfers of Value to HCPs and Government Officials

- When interacting with HCPs and Government Officials, Illumina employees must follow this Code, as well as any requirements, limitations, or prohibitions contained in the **Regional Addenda for Interactions with HCPs and Government Officials (“Regional Addenda”)** for the countries where the HCPs/Government Officials are licensed or employed. If a requirement in the applicable **Regional Addendum** conflicts with the requirements in this Code, the requirement in the **Regional Addendum** applies. The **Regional Addenda** are attached as Appendix 1 to this Code.
- All Transfers of Value to HCPs and Government Officials must serve or be directly related to a Legitimate Business Purpose. Transfers of Value may not be solely intended for relationship building or “goodwill.”
- Illumina may not provide a Transfer of Value that is intended to be, or that could reasonably be interpreted as, a reward for business or an attempt to gain preferential treatment or an unmerited or unfair advantage.
- Illumina may not provide a Transfer of Value to anyone in order to induce them to use, purchase, prescribe, or recommend the use, purchase, or prescription of Illumina’ products or services.
- All Transfers of Value to HCPs and Government Officials must be permitted by the policies of the recipient’s employer or organization.
- Illumina employees may not provide/receive cash or cash equivalents to/from HCPs or Government Officials (e.g., gifts certificates, gift cards, traveler’s checks, etc.).
- Illumina may not provide any Transfers of Value to spouses or guests of an HCP or Government Official without written approval from the Corporate Compliance Department.
- If you are interacting with an HCP or Government Official that is licensed or employed outside of your country or region, you must follow all Illumina compliance policies and local laws applicable to that individual, including following the **Regional Addenda** for the country in which the individual is licensed or employed. If you are unsure of these requirements, you must consult the applicable Regional Compliance Officer.
- Applicable law, including the U.S. Sarbanes Oxley Act, requires that Illumina keep accurate books and records of all transactions. This means that everyone at Illumina is required to report all transactions with HCPs and Government Officials truthfully and accurately using the categorizations and processes established by Illumina. Transactions must never be misreported or disguised under any circumstances.
- Interactions with Government Officials are also governed by Illumina’s **Anti-Bribery and Anti-Corruption Policy (CP 500.05)**.
- Any expense incurred and claimed by Illumina employees involving Transfer of Value to HCPs and Government Officials must also comply with Illumina’s **Travel and Expense Policy (CP 200.14)**, where applicable.

If you have any doubt about whether an interaction with an HCP or Government Official is appropriate in any situation, contact the Corporate Compliance Department at compliance@illumina.com.

2 Meals and Refreshments

Meals and refreshments may be provided to HCPs and Government Officials as long as all of the following conditions are met:

- Meals and refreshments must be subordinate in time and ancillary to a Legitimate Business Purpose. Meals may not be the main focus of the interaction and at least 70% of the time must be spent on the Business Purpose.
- Unless otherwise stated in the Regional Addendum for the country where the recipient is licensed or employed, the meal limit for the country where the meal occurs governs.
- If meals limits are not included in a **Regional Addendum** for the country where the recipient is licensed or employed, meal limits¹¹ should be based on the limits listed in the **United States Regional Addendum**, taking into consideration the current exchange rate. If a separate limit is not designated by Regional Addendum, snacks/coffee breaks should not exceed the breakfast meal limit regardless of the time of day it occurs.
- Unless otherwise stated in the Regional Addendum for the country where the recipient is licensed or employed, meal limits are inclusive of food, beverages, tax and tip per person. Added venue and administrative costs do not count towards meal limits (e.g., space rental, audio-visual, service fees, etc.).
- The total cost of meals and refreshments must be paid for by the most senior employee present for the meal. Splitting the cost of meals and refreshments to circumvent meal limitations is prohibited.
- Meals and refreshments must be accompanied by itemized receipts, regardless of the amount.
- Meals and refreshments must occur at venues conducive to the exchange of information between the attendees. The meal location and venue should not become the main attraction of the business interaction. Home delivery of meals or refreshments is not permitted, including for virtual meetings.
- Refreshments worth a maximum value of USD 10 per person (or the equivalent in local currency) may be provided to HCPs and Government Officials at congress and tradeshow booths.
- The provision of spirits/hard alcohol is prohibited. The provision of beer or wine beyond a two-drink limit per person is not conducive to meaningful business or educational discussion and is therefore considered Entertainment and is prohibited. For purposes of this Code, one bottle of wine equals 4 glasses of wine. Also, low alcohol by volume hard seltzers counts as beer and wine.
- Individual employees are prohibited from providing meals to the same HCP or GO more than two (2) times per quarter.²² This limit applies on a per employee, per HCP and GO basis.

¹ All meal limits include the cost of any drinks consumed with the meal.

² This limit does not apply to meals provided in furtherance of services an HCP or Government Official provides to Illumina pursuant to a written fee-for-service agreement (e.g., speaker agreement, consulting agreement, etc.).

3 Travel and Accommodations

Travel and accommodations may be provided to or reimbursed for HCPs and Government Officials if all of the following conditions are met:

- **Legitimate Business Purpose:** All travel and accommodations must directly support a Legitimate Business Purpose. There should be an objective, legitimate reason that supports the recipient's in-person attendance, rather than virtual or remote attendance.
- If a **Regional Addendum** exists for the country where the recipient is licensed or employed, any travel and accommodation requirements contained in the **Regional Addendum** must be followed.
- **Airfare:**³³ All airfare for trips of a duration of **less than 5 hours (one-way)** must be coach/economy class, even if this is more stringent than Illumina's **Travel and Expense Policy (CP 200.14)**. Airfare for trips of a duration of **5 hours or more (one-way)** may be premium economy, comfort, or business class. First class is prohibited without approval from Illumina's Chief Compliance Officer. (See Modifications or Extensions to Travel Accommodations below for additional days at the event locations unrelated to a legitimate Business Purpose.
- **Ground Transportation:** All ground transportation must be reasonable and not luxury. Train travel may be business class, and first-class train travel is permitted where there is no designated business class option.
- **Lodging/Hotels Accommodations**³ : Lodging venues should be commonly used by industry for business travel without public perception of extravagance. Luxury, vacation/resort venues (such as spa, hot spring, ski, golf, gambling, cruise ships, etc.) are inappropriate in most circumstances and may not be provided without approval from Corporate Compliance. Incidental expenses (such as personal bar bills, movies, laundry, telephone, etc.) may not be reimbursed. Lodging must be directly related in time and proximity to the Legitimate Business Purpose for which the lodging is being provided. In particular:
 - Hotel accommodations should only be provided for the duration of the business event. If the HCP/Government Official will be traveling long distances, it may be appropriate to provide accommodations the night before the event and/or the night that the event concludes, but accommodations should not be provided beyond that timeframe.
 - Hotel accommodations should be within close proximity and easily accessible to the business event.
- **Modifications or Extensions to Travel and Accommodations:** Any modifications or extensions to travel and accommodations that exceed the dates directly associated with a Legitimate Business Purpose for which the travel and accommodations are provided, must be covered entirely by the HCP/Government Official. Illumina will not be responsible for any additional costs incurred due to such changes. This includes, but is not limited to, flight change fees, additional fare differences, or extended travel arrangements outside the dates directly associated with a Legitimate Business Purpose.
- **Special Rules for HCPs:** Travel and accommodations may be provided to HCPs provided that the general requirements listed above in this section and the following conditions are met:

³ Illumina may not pay any expenses (including support of travel agent) related to travel and accommodation class upgrades, schedule changes due to personal preferences or circumstances, non-commercial purposes or personal reasons.

- The HCP will speak at an Illumina or third-party event or provide consulting services to Illumina that require travel, subject to a written speaking or consulting agreement,
- The HCP will attend an Illumina Educational Event and Product Training, or
- The HCP will attend another type of *non-promotional* event (for e.g., an Illumina factory visit, demonstration of non-portable equipment) that requires in-person attendance and written Corporate Compliance guidance is obtained prior to providing the travel and/or accommodations.

Unless explicitly permitted under the applicable **Regional Addendum** for the country where the recipient is licensed or employed, travel and accommodations may not be provided to HCPs to support promotional, sales, or commercial business meetings, except where the demonstration of non-portable equipment is necessary. Any travel and accommodations provided to HCPs to support their attendance at a third-party congress requires Compliance pre-approval.

4 Gifts, Promotional Items, and Medical Educational Items

HCPs: Unless explicitly permitted under the applicable **Regional Addendum** for the country where the recipient is licensed or employed, Gifts may not be provided to HCPs.⁴

Promotional Items with a maximum value of USD \$10 (or the equivalent in local currency) may be provided to HCPs.

Medical Educational Items valued at less than USD \$100 (or the equivalent in local currency) may be provided to HCPs.

Government Officials: Gifts and Promotional Items may be provided to Government Officials that are not HCPs, provided that the following conditions are met:

- The Gift or Promotional Item must be associated with a Legitimate Business Purpose and provided to the recipient at the time of the business meeting or event.
- Any local law limits on gifts to Government Officials set forth in the **Regional Addenda** are followed; In the absence of local law limits, the Gift or Promotional Item does not exceed the following values per gift/occasion:
 - USD \$100 (or equivalent in local currency) if the item contains an Illumina logo, or
 - USD \$25 (or equivalent in local currency) if the item has no Illumina logo.
- Gifts and Promotional Items may not be given to an individual Government Official more than once a quarter.⁵
- Gifts of cash or cash equivalents (e.g., gifts certificates, gift cards, traveler's checks, etc.) are strictly prohibited.

Drawings and contests are only allowed when the "prize" is an item that all potential winners are permitted to receive under this section of the Code and all applicable Regional Addenda. See Category 7 of the No Charge Product Framework in Appendix 2 for requirements related to Research Contests.

5 Entertainment

Illumina may not provide Entertainment to HCPs or Government Officials.

⁴This prohibition applies even if personal funds are used.

⁵ This once per quarter limit does not apply to Gifts and Promotional Items made available at tradeshow/congress booths.

6 No Charge Products and Services

All no-charge products and services given to HCPs, HCOs, Government Officials, or other third parties must be consistent with Illumina's **No-Charge Product Framework**, attached as [Appendix 2](#) to this Code.⁶

7 Educational Grants, Research Grants, and Research Collaborations

Educational Grants (Continuing Medical Education and other Professional Education): All Educational Grants must comply with Illumina's **Grants and Research Collaborations Policy (CP 500.14)**, the **No Charge Product Framework**, and be approved by Illumina's Medical Education Review Committee.

Research Grants: All Research Grants must comply with Illumina's **Grants and Research Collaborations Policy (CP 500.14)** and the **No Charge Product Framework**. Research grants to HCPs or HCOs, or otherwise involving research related to human health, must be approved by Illumina's Medical Research Review Committee.

Research Collaborations: All Research Collaborations must comply with Illumina's **Grants and Research Collaborations Policy (CP 500.14)** and the **No Charge Product Framework**. Research Collaborations with HCPs or HCOs, or otherwise involving research related to human health, must be approved by Illumina's Medical Research Review Committee.

8 Sponsorships

All Sponsorships must comply with Illumina's **Sponsorship Policy (CP 600.03)**.

9 Charitable Donations

All charitable donations must comply with Illumina's **Corporate Donations Policy (CP 900.01)** and be approved by Illumina's Corporate Social Responsibility department.

10 Consulting, Speaking, Advisory and Other Services Provided by HCPs and Government Officials

All consulting, speaking, and advisory engagements with HCPs, HCOs, and Government Officials must be based on a legitimate need, compensated with fair market value payments, and comply with Illumina's **Engagement of Healthcare Professionals and Government Officials and Fair Market Value Policy (CP 500.17)**.

11 All Other Transfers of Value to HCPs

Other than the Transfers of Value described in Sections 2 through 10 of this Code, Illumina may not provide any other Transfer of Value⁷ to HCPs, HCOs, Government Officials, or government entities or institutions for which Illumina will not receive fair market value compensation in return unless prior review and approval from Legal and Corporate Compliance has been obtained.

12 Vendors and Other Third Parties that Interact with or Pay HCPs or Government Officials on Behalf of Illumina

Illumina is ultimately responsible for interactions with and payments to HCPs and Government Officials made by third parties on behalf of Illumina. Prior to committing to engage a new vendor that will interact with

⁶ Additional resources can be found on the **"No-Charge Product Framework"** section of the **Corporate Compliance Insider Page**.

⁷ Examples of other Transfers of Value include but are not limited to consulting services, assistance with setting up labs or workflows, support related to customer resource and capacity needs, etc.

and/or pay an HCP or Government Official on Illumina's behalf, Illumina must:

- (1) Prior to engagement, and periodically throughout engagement based on risk, conduct due diligence on the third-party to determine whether there are any bribery or corruption-related red flags. The due diligence, at a minimum, should be comprised of:
 - Name searches (including name variations and dba names) of the entity, owners, and principals against relevant watchlists, blacklists, sanctions lists, Politically Exposed Persons lists, state owned enterprise lists and adverse media, and
 - An open-source investigation (e.g., search of open records such as Linked In, Dunn and Bradstreet, etc.).
- (2) Notify the relevant Regional Compliance Officer ("RCO"). The RCO will review the terms of engagement, and any bribery or corruption related red flags identified during due diligence and determine whether further due diligence or risk mitigation measures are required prior to engagement.
- (3) Enter into a written, fully executed contract that remains in effect during the entire engagement and requires the vendor or other third party to:
 - Comply with all applicable anti-corruption and anti-kickback laws;
 - Ensure that any payments made by the vendor to HCPs on behalf of Illumina are at fair market value and consistent with the principles set forth in this Code and Illumina's **Engagement of Healthcare Professionals and Government Officials and Fair Market Value Policy (CP 500.17)**,⁸ and
 - Provide Illumina with data on all HCP Transfers of Value in a format provided by Illumina.
- (4) Ensure that all payments to the vendor or other third party are consistent with the terms of the executed service contract with the vendor. Receipts are required for reimbursement of expenses.

For clarity, the above requirements apply to third-party vendors engaged for Market Research Projects, where applicable.

13 Meetings and Events

- (1) Illumina may hold or participate in the following types of meetings and events:
 - **Illumina organized meetings and events**, including:
 - **Educational Event and Product Training** – An educational event or training organized by Illumina and intended to provide education on genomics or training on the safe and effective use of Illumina products;
 - **Promotional/Sales Meeting or Event** – A meeting or event organized by Illumina and intended to promote or discuss features, specifications, and/or pricing related to Illumina products and services;
 - **Advisory Board** – A meeting convened by Illumina to obtain a third-party expert's feedback, insights, or guidance on a product need, or medical, scientific, or business discipline. Advisory Boards must follow the **Advisory Board Checklist** which can be located in Appendix 3 of the Integrity Code;
 - **Illumina Internal Meeting or Event** – A meeting targeted to Illumina employees in which HCPs

⁸ If Illumina identifies the HCP(s) to be engaged and/or paid by a third party on Illumina's behalf, all payments to the HCP(s) must be consistent with Illumina's Fair Market Value Guidelines and rates.

- and/or Government Officials may be engaged to present about Illumina's products and services, genomics, and/or the life sciences industry generally;
- **Satellite Symposium** – An Illumina-organized and funded program that is appended to a Third-Party Organized Event agenda. These programs often take place during meal breaks at the Third-Party Event and may address education and training topics that coincide with the Third-Party Event's focus. Attendees to a Satellite Symposium are mostly drawn from the main Third Party Organized Event.
 - **Third-Party Organized Events** – Educational or scientific meetings, congresses, tradeshows, academies, conferences, or any other forums for HCPs and/or Government Officials, that are not run or organized by Illumina which address genomics, medical conditions, disease states, therapies, or treatments for which Illumina's products may be used.
- (2) Illumina may not directly pay or reimburse HCPs for their **attendance** at a Third-Party Organized Event. However, Illumina may support such Third Party Organized Events by way of Sponsorship (Section 8), Educational Grant (Section 7), or payment for both space and advertisement etc.
- (3) Illumina may also organize and pay for a Satellite Symposium alongside a Third Party Organized Event and engage paid speaker(s) for such Satellite Symposium. But Illumina may not pay for travel and accommodation for HCPs attending such Satellite Symposium.
- (4) Illumina may invite HCPs and Government Officials to attend or participate in Illumina organized meetings and events), provided that:
- All venues for Illumina-organized events and meetings must be conducive to the effective exchange of information and may not be luxury, tourist, or entertainment oriented. The event location and venue should not become the main attraction of the event. Venues should be located at or reasonably near the HCP's or Government Official's place of business, an Illumina facility, or central location given the place of residence of the majority of participants invited;
 - All Transfers of Value to attendees (e.g., meals, travel, accommodations, gifts, etc.)⁹ are documented, reported according to Illumina's transparency reporting requirements, and consistent with the requirements of **this Code** and any applicable **Regional Addenda**;
 - All payments made to HCPs and Government Officials for services provided in relation to the meeting or event are in compliance with Illumina's **Engagement of Healthcare Professionals and Government Officials Policy and Fair Market Value Guidelines (CP 500.17)**; and
 - At least 70 percent of the time for the meeting or event should be spent in furtherance of the educational or promotional purpose. This means that any ancillary meals or refreshments should not last more than 30 percent of the total time of the comprehensive activity or interaction.

⁹ Illumina may not compensate third parties in any way for attendance at a meeting or event. Compensation may only be provided to third parties in return for legitimately needed services provided in relation to the meeting or event, consistent with Illumina's **Engagement of Healthcare Professionals and Government Officials Policy and Fair Market Value Guidelines**.

14 Channel Partners

Illumina's Channel Partners are contractually obligated to follow all applicable anti-bribery, anti-corruption, and healthcare fraud prevention laws. Channel Partners are also expected to implement their own compliance programs, including appropriate policies and procedures tailored to their company and risks. When independently interacting with Healthcare Professionals and Government Officials in relation to the sale of Illumina products and services, Channel Partners should follow their own policies and procedures to manage and mitigate bribery and corruption risks. However, if one or more Illumina employees are attending, funding, and/or actively participating in planning a Channel Partner activity that involves interactions with Healthcare Professionals or Government Officials, the activity must comply with this Policy, as well as Illumina's ***Code of Conduct, Anti-Bribery and Anti-Corruption Policy (CP 500.05)***, and Engagement of Healthcare Professionals and Government Officials Policy (CP 500.17).

15 Co-Marketing Activities

Whenever Illumina partners with a third party to hold an event or activity where both Illumina and the third party will receive exposure for their products, services, and/or research, or any other type of marketing or promotional benefits (referred to herein as "Co-Marketing Activities"). Illumina and the third party must share equally, or in proportion to the value or benefit received, in the combined costs and resources required for the Co-Marketing Activity. Illumina may not assume all or a disproportionate amount of the costs and resources. All Co-Marketing Activities must be documented in a Co-Marketing Agreement signed by both parties which clearly describes the roles and responsibilities of each party.

Illumina's compliance policies apply to all aspects of Co-Marketing Activities. For example, the meal and alcohol limits and prohibitions on entertainment contained in this Policy apply to Co-Marketing Activities even if the third-party co-host has different limits or rules. The third-party co-host may not pay for or provide anything that would result in the activity as a whole violating Illumina's compliance policies or exceeding Illumina's thresholds.

16 Authorship

Illumina follows the authorship credit criteria laid out by the International Committee of Medical Journal Editors.

Illumina may not contribute to an independent third-party publication for the purpose of (1) alleviating a financial burden on the third party, or (2) inducing or rewarding the purchase of Illumina products and services. Any Illumina contribution to an independent third-party publication must be documented in a written agreement clearly describing the contribution and the legitimate purpose for which it is being provided (e.g., how Illumina will use the data presented in the publication).

17 Joining Industry Associations

Corporate Compliance must be notified in advance of Illumina joining any medical technology or other industry association (i.e., AdvaMed, MedTech, MTAA, APACMed) so that Compliance can evaluate whether Illumina will be subject to any new compliance-related obligations as a condition of membership. Compliance and Regional Leadership must confirm availability of resources to meet any new obligations prior to Illumina becoming a member.

18 Transparency Reporting and “Sunshine Act” Requirements (Tracking and Disclosure of Interactions with HCPs and HCOs)

It is Illumina’s policy to track and report payments or other transfers of value or benefits made to certain HCPs, GOs and HCOs (“**Covered HCPs/GOs/HCOs**”) in order to comply with all applicable global transparency laws (e.g., the United States Sunshine Act, France’s Loi Bertrand, Massachusetts, Vermont, Connecticut, and other U.S. State and international disclosure laws).

All personnel are required to report all TOVs provided to HCPs, GOs, and HCOs in compliance with the Sunshine Act and other applicable global transparency reporting requirements. For more information visit the “**Transparency Reporting**” section of the **Corporate Compliance Insider Page** or send questions to sunshineact@illumina.com.

19 Reporting Potential Compliance Violations or Concerns

Everyone has an obligation to promptly report violations of this Code. Not reporting a violation that you are aware of may result in discipline up to and including termination of employment.

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 this Code are responsible for conveying the compliance concern to the Chief Compliance Officer or other senior member of the Corporate Compliance Department within forty-eight (48) hours.
- You may submit concerns to the Corporate Compliance Department via email at compliance@illumina.com.
- You may submit concerns directly to the Chief Compliance Officer or other senior member of the Corporate Compliance Department.
- You may also submit a concern via the third-party managed Compliance and Fraud Prevention Hotline via the internet through the hotline link found on the Corporate Compliance Insider Page or by calling one of the global toll-free phone numbers available on the Hotline website. Reports made through the Compliance and Fraud Prevention Hotline may be made anonymously unless prohibited by local law.

Generally speaking, every effort will be made to maintain the confidentiality of reports about potential violations; however, depending on the circumstances, it may not be possible in all cases to protect the identity of the person making the report.

20 Who to Contact if You Have Questions About This Code

Send questions to: compliance@illumina.com.

Release History

| Version | Version Date | Policy Owner | Description of Change |
|---------|----------------|-----------------|---|
| 00 | April 14, 2023 | Gwen Chapman | Initial Release. |
| 01 | March 08, 2024 | Lesa Hutnak | Various updates to clarify existing requirements and amend certain limitations. |
| 02 | May 1, 2025 | Lacey Daugherty | Various updates to clarify existing requirements and amend certain limitations. |

Integrity Code Appendix 1

Regional Addenda

AMR Regional Addenda

UNITED STATES

1. DEFINITIONS

Healthcare Professional (HCP): Any person or entity (a) authorized or licensed in the United States to provide health care services or items to patients or (b) who is involved in the decision to purchase, prescribe, order, or recommend a medical technology in the United States. This term includes individual clinicians (for example, physicians, nurses, and pharmacists, among others), provider entities (for example, hospitals and ambulatory surgical centers), and administrative personnel at provider entities (for example, hospital purchasing agents).

Federal Government Employee: Any full or part-time employee of a U.S. Federal government agency, institution, or organization, including but not limited to employees of the National Institute of Health (NIH), U.S. Food and Drug Administration (FDA), and the Department of Defense (DOD).

2. MEALS AND REFRESHMENTS

HCPs licensed and/or practicing in the State of Vermont: No meals or refreshments may be provided to HCPs or their staff.

All other HCPs licensed and/or practicing in the United States: The maximum amount (per person) for meals and refreshments to HCPs should not exceed:

- Breakfast/Lunch/Snack: USD \$80/person
- Dinner: USD \$150/person

Federal Government Employees: Federal agencies, institutions, and organizations often have rules regarding the type of Transfers of Value that their employees may receive (e.g., per meal caps, per year caps for all Transfers of Value, etc.). Prior to providing a meal or refreshment to a Federal Government Employee, the Illumina employee responsible for this Transfer of Value must ensure and document that the Transfer of Value is permitted under the policies and rules of the recipient's institution or organization and that Illumina will not exceed any caps set by the recipient's institution or organization.¹

3. TRAVEL AND ACCOMMODATIONS

Federal Government Employees: Federal agencies, institutions, and organizations often have rules regarding the type of Transfers of Value that their employees may receive (e.g., prohibitions on travel and accommodations, per year caps for all Transfers of Value, etc.). Prior to providing travel and/or accommodations to a Federal Government Employee, the Illumina employee responsible for this Transfer of Value must ensure and document that the Transfer of Value is permitted under the policies and rules of the recipient's institution or organization and that Illumina will not exceed any caps set by the recipient's institution or organization.²

¹Contact Illumina's Government Affairs Department with questions about these rules.

²Contact Illumina's Government Affairs Department with questions about these rules.

4. GIFTS, PROMOTIONAL ITEMS, AND MEDICAL EDUCATION ITEMS

Promotional Items with a maximum value of USD \$10 may be provided to HCPs.

Gifts may not be provided to HCPs or Federal Government Employees.

Medical Educational Items valued at less than USD \$100 may be provided to HCPs.

5. CONSULTING, SPEAKING, ADVISORY, AND OTHER SERVICES

Federal Government Employees: Federal agencies, institutions, and organizations often have rules regarding whether their employees may provide services to industry. Prior to engaging a Federal Government Employee to provide a service to Illumina, the Illumina employee responsible for the engagement must ensure and document that the engagement is permitted under the policies and rules of the recipient's institution or organization and that Illumina will not exceed any caps set by the recipient's institution or organization.³

6. TRANSPARENCY REPORTING REQUIREMENTS

All Illumina personnel are required to report TOVs provided to HCPs and HCOs in compliance with the Physicians Payment Sunshine Act. Illumina personnel must familiarize themselves with these legal obligations prior to providing, or offering to provide, any Transfers of Value to an HCP or HCO. For details regarding these obligations, visit the "**Transparency Reporting**" section of the **Corporate Compliance Insider Page** or contact Compliance@illumina.com.

When hosting events that include attendees or speakers from other countries, refer to the applicable regional addenda for reporting requirements.

7. ADDITIONAL REQUIREMENTS FOR THE UNITED STATES

California HCPs: California Aggregate HCP Spend Limit

The aggregate value of all promotional materials, items or activities provided for each of the following types of California HCPs may not exceed USD 2,500 per calendar year:

- Anyone licensed in California to prescribe drugs (e.g., an M.D., Nurse Practitioner).
- A medical student in California.
- A member of a drug formulary committee.

The aggregate spending limit does not apply to any of the following benefits that are provided to such California HCPs if they are otherwise provided in compliance with this Integrity Code:

- Evaluation and demonstration products provided at no charge,
- Financial support for research grants,
- Financial support for continuing medical education,
- Financial support for health education scholarships/sponsorships, or
- Payments made for legitimate services provided to Illumina by the California HCP.

All other interactions with HCPs and Government Officials in the United States that are not covered in this Regional Addendum are subject to the provisions of the *Integrity Code* (CP 500.16).

³Contact Illumina's Government Affairs Department with questions about these rules.

BRAZIL

1. HCP DEFINITION

Healthcare Professional (HCP): Natural person who carries out their professional activities in the chain of use of health products, including, but not limited to, the activities of purchasing, evaluating, recommending, prescribing, handling and/or applying health products, including, but not limited to physicians, nurses, dentists, pharmacists, physiotherapists, scientists, researchers, health technicians, attendants, buyers and employees, including decision-making persons, working in health organizations. For all intents and purposes, whenever this code refers to health care professionals, this term will be extended to their family members, team members, friends, clients, or business partners.

2. MEALS AND REFRESHMENTS

The maximum amount (per person) for meals to HCPs and Government Officials should not exceed:

- Breakfast/Lunch/Snack: BRL 300.00/person
- Dinner: BRL 400.00/person

The meals limits are inclusive of food, beverages, taxes and tips.

Federal Government Employees: Federal agencies, institutions, and organizations often have rules regarding the type of Transfers of Value (TOV) that their employees may receive (e.g., per meal caps, per year caps for all TOV, etc.). Prior to providing a meal or refreshment to a Federal Government Employee, the Illumina employee responsible for this TOV must ensure and document that the TOV is permitted under the policies and rules of the recipient's institution or organization and that Illumina will not exceed any caps set by the recipient's institution or organization.⁴

3. TRAVEL AND ACCOMMODATIONS

The preferred method is for Illumina to book travel and accommodation reservations on behalf of the HCPs. If direct purchase is not possible, the reimbursement should be for the actual costs and appropriate and must be accompanied by an itemized receipt. Reimbursement must be made by electronic bank transfer. Cash is prohibited.

All other rules in the *Integrity Code* apply.

⁴Contact Illumina's Government Affairs Department with questions about these rules.

4. GIFTS, PROMOTIONAL ITEMS, AND MEDICAL EDUCATION ITEMS

Gifts may not be provided to HCPs or Government Officials, except for the following:

- Basic and low-cost stationery items may be provided to support HCPs and/or Government Officials at events (e.g., pens, notepads, etc.) not to exceed BRL100.00/person.
- Cards may be provided to HCPs for culturally relevant events, birthdays, and religious holidays.
- Medical Purpose Items⁵ that are patient related and have a genuine educational function for HCPs may be provided, if the following limitations are followed:
 - a) The medical purpose items must:
 - Be related to the work of the healthcare professional or benefit patients,
 - Be related to an educational event or training on a product, and
 - Not have a commercial value.
 - b) No more than 3 medical purpose items may be provided to an HCP in each calendar year.
 - c) Except for medical textbooks or anatomical models used for educational purposes any other item must have a value of less than BRL100.00.

5. CONSULTING, SPEAKING, ADVISORY, AND OTHER SERVICES

All consulting agreements must be in the local language. Additional rules and requirements are contained in Illumina's *Engagement of Healthcare Professionals and Government Officials Policy and Fair Market Value Guidelines (CP 500.17)*.

6. TRANSPARENCY REPORTING REQUIREMENTS

All Illumina personnel are required to report TOVs provided to HCPs and HCOs from the State of Minas Gerais, in compliance with Law 22.440 from 12/21/2016 and Law 22.921 from 01/12/2018. Illumina personnel must familiarize themselves with these legal obligations prior to providing, or offering to provide, any Transfers of Value to an HCP or HCO. For details regarding these obligations, visit the **Corporate Compliance Insider Page** or contact Compliance@Illumina.com.

When hosting events that include attendees or speakers from other countries, refer to the applicable regional addenda for reporting requirements.

7. ADDITIONAL REQUIREMENTS FOR BRAZIL

Public Entities. If the HCP provides services, or has any relationship with public entities, the offer of free samples and other products without cost must be evaluated individually to ensure compliance with the requirements of public purchases and bids.

Sponsorships, regardless of their monetary value, must be documented and supported by a formal agreement to ensure compliance with local tax accounting legislation and to provide a clear audit trail for external audit purposes.

All other interactions with HCPs and Government Officials in Brazil that are not covered in this Regional Addendum are subject to the provisions of the *Integrity Code (CP 500.16)*.

⁵ "Medical Purpose Item" in Brazil means professional-use items that contribute to teach HCPs and/or their patients about medical conditions, therapies, and/or healthcare products.

MÉXICO

1. HCP DEFINITION

Healthcare Professional (HCP): All professionals, technicians, and auxiliaries in the healthcare disciplines who may work in the public or private sector, including management, administrative, operational, and warehouse personnel. This includes, but is not limited to, the following: physicians (including all current and future specialties and subspecialties), laboratory personnel, dentists, veterinarians, biologists, bacteriologists, nurses, social workers, chemists, psychologists, sanitary engineers, nutritionists, dietitians, pathologists. For the purposes of this Code, healthcare professionals also include any person who directly or indirectly influences the prescription and recommendation of medical devices.

2. MEALS AND REFRESHMENTS

The maximum amount (per person) for meals to HCPs and Government Officials should not exceed:

- Breakfast/Snack: MXN \$450.00/person (or its equivalent in US dollars)
- Lunch/Dinner: MXN \$1.350.00/person (or its equivalent in US dollars)

*Does not include tips and taxes.

* Subject to annual updates according to fluctuations in the exchange rate between the U.S. dollar and Mexican Peso and inflation costs.

Federal Government Employees: Federal agencies, institutions, and organizations often have rules regarding the type of Transfers of Value (TOV) that their employees may receive (e.g., per meal caps, per year caps for all TOV, etc.). Prior to providing a meal or refreshment to a Federal Government Employee, the Illumina employee responsible for this TOV must ensure and document that the T is permitted under the policies and rules of the recipient's institution or organization and that Illumina will not exceed any caps set by the recipient's institution or organization.¹

3. TRAVEL AND ACCOMMODATIONS

It is appropriate to cover travel and accommodation costs related to **events**, courses, product training, education, or equipment demonstrations in accordance with the following guidelines:

- Expenses for transportation, accommodation, and meals incurred from the day before the event until one day after its conclusion may be covered, provided that the itinerary requires it.
- Accommodation must be in the event's host hotel or hotels with similar rates. In such cases, not to pay additional expenses outside of the hotel's accommodation rate and all participants must stay in standard rooms.
- For HCP attending, events should not be held at the paradise locations in the National Territory:
 - Riviera Maya
 - Cancun
 - Acapulco
 - Cozumel
 - Los Cabos

- o Riviera Nayarit / Nuevo Vallarta
- o Puerto Vallarta

4. GIFTS, PROMOTIONAL ITEMS, AND MEDICAL EDUCATION ITEMS

Gifts may not be provided to HCPs or Government Officials.

Promotional, Educational and/or Scientific Items may be given to HCPs or Government Officials. Under no circumstances should these items serve as incentives for the purchase or prescription of a product, nor should they condition the sale of such products. These items must adhere to the following guidelines:

Promotional Items:

- They will support certain professional activities, without substituting educational materials (i.e.: including notebooks, notepads, pens, etc.)
- They should have a promotional or advertising purpose and must display Illumina's logo.
- Their unit cost must not exceed MXN \$200.00 (or its equivalent in US dollars (excluding taxes).
- They must not be intended for entertainment, decorative purposes, or personal use.
- The number of promotional items given to the same HCP at an event should be appropriate to the event itself.
- For educational activities conducted via **Virtual Interaction**, sending Promotional Items to the locations where HCP are situated, such as their home, hospital, private practice, or university, is not permitted.

Educational and or Scientific Material that includes characteristics and resources that facilitate understanding, teaching, and learning, can be provided to HCPs exclusively for educational or scientific purposes and must be related to medical practice. Providing this material does not influence the prescription, purchase, or recommendation of a product and must apply to the following:

- The authorized amount for providing this material is limited to MXN \$750.00 (or its equivalent in US dollars) except for anatomical models, which can be provided up to \$2,000.00 (or its equivalent in US dollars). Both amounts exclude taxes.
- Must record the provision of these materials, indicating the cause, frequency, and type of material provided.
- Educational material is limited to once per year per HCP or Institution and must adhere to the maximum amount here specified. This amount is per event, not per item.

5. CONSULTING, SPEAKING, ADVISORY, AND OTHER SERVICES

All consulting agreements must be in the local language. Additional rules and requirements are contained in Illumina's *Engagement of Healthcare Professionals and Government Officials Policy and Fair Market Value Guidelines (CP 500.17)*.

6. TRANSPARENCY REPORTING REQUIREMENTS

Illumina does not currently have transparency reporting requirements for Mexico.

When hosting events that include attendees or speakers from other countries, refer to the applicable regional addenda for reporting requirements.

7. ADDITIONAL REQUIREMENTS FOR MEXICO

No additional requirements for Mexico.

All other interactions with HCPs and Government Officials in Mexico that are not covered in this Regional Addendum are subject to the provisions of the *Integrity Code (CP 500.16)*.

CANADA

1. HCPDEFINITION

Healthcare Professional (HCP): Individuals and entities that purchase, lease, recommend, use, arrange for the purchase or lease of, or prescribe companies’ medical technology products in Canada. This includes both clinical and non-clinical people who make product-related decisions of the sort listed. This is a broad definition, intended to encompass anyone with material influence over purchasing decisions.

2. MEALS AND REFRESHMENTS

The maximum amount (per person) for meals to HCPs and Government Officials should not exceed:

| | During Business Discussions CAD/USD ⁶ | Supporting Business Travel CAD/USD ⁷ |
|------------------------|---|--|
| Breakfast/Snack | 50/person | 25/person |
| Lunch | 75/person | 50/person |
| Dinner | 150/person | 75/person |
| Daily Maximum | 150/person | N/A |

3. TRAVEL AND ACCOMMODATIONS

Illumina may provide travel and accommodations to potential or current Canadian HCP/HCO customers to enable site visits to Illumina manufacturing and/or commercial locations to evaluate Illumina products or services provided that the following requirements are met:

- Site visit purchasing representatives must be qualified personnel that are able to evaluate the clinical utility of the Illumina products or ensure the fairness and integrity of the procurement process.
- The duration of site visits must be limited to the amount of time necessary to evaluate the products or services and their clinical and technical capabilities.
- Business class and first-class travel is prohibited for these site visits.
- The number of purchasing representatives for which Illumina may provide business courtesies (e.g., travel, accommodations, meals) so that purchasing representatives may evaluate and determine the suitability of Illumina products in Canada is limited to the following:⁸
 - Single Product Evaluation: 3 purchasing representatives.
 - Multi-Product Evaluation: 5 purchasing representatives.
 - Bulk Buy or Multi-Site Project: 7 purchasing representatives.

⁶ When the HCP is in Canada, the amount is in Canadian dollars. When the HCP is in the United States, the amount is in US dollars.

⁷ See footnote 2.

⁸ Additional purchasing representatives may attend; however, Illumina may not provide travel, accommodations, or any other business courtesies to these additional representatives.

- Prior to any site visit, Illumina must provide the purchasing representatives an itinerary clearly identifying the products that will be evaluated.

4. GIFTS, PROMOTIONAL ITEMS, AND MEDICAL EDUCATION ITEMS

Promotional Items with a maximum value of USD \$10 (or the equivalent in local currency) may be provided to HCPs.

Illumina may provide Medical Educational Items to HCPs as long as the item:

- Is not personal in nature,
- Relates to the HCP's practice, it benefits patients or serves a genuine educational function, and
- Does not exceed CAD 100 in any one instance.

Government Officials: Illumina employees may not give Government Officials Gifts or Promotional Items that exceed CAD 50 in value.

5. CONSULTING, SPEAKING, ADVISORY, AND OTHER SERVICES

Canada has specific rules and requirements regarding engagement of HCPs and Government Officials for consulting, speaking, advisor, and other services. These rules and requirements are contained in Illumina's *Engagement of Healthcare Professionals and Government Officials Policy and Fair Market Value Guidelines (CP 500.17)*.

6. TRANSPARENCY REPORTING REQUIREMENTS

Illumina does not currently have transparency reporting requirements for Canada.

When hosting events that include attendees or speakers from other countries, refer to the applicable regional addenda for reporting requirements.

7. ADDITIONAL REQUIREMENTS FOR CANADA

No additional requirements for Canada.

All other interactions with HCPs and Government Officials in Canada that are not covered in this Regional Addendum are subject to the provisions of the *Integrity Code (CP500.16)*.

AMEA Regional Addenda

AUSTRALIA

1. DEFINITIONS

Healthcare Professional (HCP): Any individual or entity (including a hospital or hospital group) involved in the provision of healthcare services and/or items to consumers; including the purchasing, leasing, recommending, using, arranging for the purchase or lease of, or prescribing medical technologies in Australia. This definition includes a person in training or a person under the direction or control of an HCP.

2. MEALS AND REFRESHMENTS

The following meal limits apply for HCPs and Government Officials:

| Types of Meals | Monetary Caps ⁹ |
|---|----------------------------|
| Breakfast / Snacks / Informal Lunch (Box) | AUD 50 |
| Formal Meals – Lunch or Dinner | AUD 125 ¹⁰ |

3. TRAVEL AND ACCOMMODATIONS

No unique rules for Australia. All rules in the *Integrity Code* apply.

4. GIFTS, PROMOTIONAL ITEMS, AND MEDICAL EDUCATION ITEMS

HCPs: For HCPs, no Gifts or Promotional Items are permitted. Educational Items with a market value of less than AUD 100 are permitted.

Government Officials: For Government Officials, the rules in the *Integrity Code* apply.

5. CONSULTING, SPEAKING, ADVISORY, AND OTHER SERVICES

No unique rules for Australia. All rules in the *Integrity Code* apply.

6. TRANSPARENCY REPORTING REQUIREMENTS

Illumina does not currently have transparency reporting requirements for Australia.

When hosting events that include attendees or speakers from other countries, refer to the applicable regional addenda for reporting requirements.

7. ADDITIONAL REQUIREMENTS FOR AUSTRALIA

No additional requirements for Australia.

All other interactions with HCPs and Government Officials in Australia that are not covered in this Regional Addendum are subject to the provisions of the *Integrity Code* (CP500.16).

⁹ These monetary caps are not inclusive of VAT and any service fee charges.

¹⁰ Australian Public Service Agency Heads must declare and record any gifts or benefits (including meals) they receive that are valued in excess of AUD 100 (excluding tax) in the public Gift Register.

INDIA

1. DEFINITIONS

Healthcare Professional (HCP): Any person or entity (a) authorized or licensed in India to provide health care services or items to patients or (b) who is involved in the decision to purchase, prescribe, order, or recommend a medical technology in India. This term includes individual clinicians (for example, physicians, nurses, and pharmacists, among others), provider entities (e.g., hospitals and ambulatory surgical centers), and administrative personnel at provider entities in India (for example, hospital purchasing agents).

2. MEALS AND REFRESHMENTS

The meals limits apply below and apply to HCPs and Government Officials:

| Types of Meals | Monetary Caps ¹¹ |
|--------------------------|-----------------------------|
| Breakfast / Refreshments | INR 1000 |
| Lunch | INR 2,000 |
| Dinner | INR 5,300 |
| Meals in Hospitals | INR 1,200 |

3. TRAVEL AND ACCOMMODATIONS

HCPs: Travel and accommodations may only be provided to HCPs that Illumina engages as faculty, proctors, or train on Illumina products. All travel-related rules and limits set out in the *Integrity Code* apply to travel and accommodations provided for these engagements.

Government Officials: The rules in the *Integrity Code* apply.

4. GIFTS, PROMOTIONAL ITEMS, AND MEDICAL EDUCATION ITEMS

For HCPs: Only the following are permitted:

- Educational Items which meet the requirements of the Integrity Code, and
- Branded Promotional Items with a maximum value of INR 1,000.

For Government Officials: Follow the provisions of the *Integrity Code*.

5. CONSULTING, SPEAKING, ADVISORY, AND OTHER SERVICES

No unique rules for India. All rules in the *Integrity Code* apply.

6. TRANSPARENCY REPORTING REQUIREMENTS

Illumina does not currently have transparency reporting requirements for India.

When hosting events that include attendees or speakers from other countries, refer to the applicable regional addenda for reporting requirements.

¹¹ The monetary caps are not inclusive of VAT and any service fee charges.

7. ADDITIONAL REQUIREMENTS FOR INDIA

No additional rules for India.

All other interactions with HCPs and Government Officials in INDIA that are not covered in this Regional Addendum are subject to the provisions of the *Integrity Code* (CP500.16).

JAPAN

1. DEFINITIONS

Healthcare Professional (HCP): Medical doctors, dentists, pharmacists, and other medical professionals belonging to a medical institution or the like, and board members, employees and others who participate in selection or purchase of medical devices at the said institutions (including "person engaged in medical administrative operations").

2. MEALS AND REFRESHMENTS

In addition to beer and wine, Sake may be provided to HCPs and Government Officials while in Japan, provided that:

- A maximum of two 180ml servings of Sake per person are permitted, and
- The remainder of the rules regarding alcohol in Sections 2 and 5 of the *Integrity Code* are followed.

HCP meal limit:

In accordance with the guidelines by the Japan Fair Trade Council of the Medical Devices Industry, the following meal limits apply for HCPs:

| Type of Event | Monetary Caps (per person) | |
|--|---|---|
| Meals with normal business operations 通常の営業活動に伴う飲食の提供 | <u>In HCP Office</u> Breakfast/Snack/Lunch – JPY 3,000 Dinner – JPY 6,000 <u>Outside of HCP Office</u> Breakfast/Lunch – JPY 8,000 Dinner – JPY 10,000 | Not including tax but inclusive of service charge |
| Lunch boxes and light refreshments at conference, speaking seminar 説明会・会議・講演会・セミナー等 開催中の茶菓・弁当の提供 | JPY 3,000 | Not including tax but inclusive of service charge |
| Meals at conference, speaking seminar for speaker 講演会等での役割者に対する慰労等での飲食の提供 | <u>In HCP Office</u> Breakfast/Snack/Lunch – JPY 3,000 Dinner – JPY 6,000 <u>Outside of HCP Office</u> Breakfast/Lunch – JPY 8,000 Dinner – JPY 13,500 | Not including tax but inclusive of service charge |

Government Officials: In accordance with the Rules of Ethics for Government Officials, no meals may be provided except in the following cases:

| Type of Event | Monetary Caps (per person) | |
|--|----------------------------|----------------------------------|
| Light meals and refreshments at a meeting where official attends as his/her duty as an official 公務員が職務として出席した会議での茶菓・簡素な飲食物の提供 | JPY 3,000 | Including tax and service charge |
| Meals served at a buffet style party for more than 20 persons 20名以上が出席する立食パーティーでの飲食物の提供 | JPY 20,000 | Including tax and service charge |

3. TRAVEL AND ACCOMMODATIONS

There are no unique requirements for Japan. All rules in the *Integrity Code* apply.

4. GIFTS, PROMOTIONAL ITEMS, AND MEDICAL EDUCATION ITEMS

For HCPs and Government Officials, local rules permit only the following:

- Branded Promotional Items with a maximum value of JPY 1,000 during Illumina organized on-site event, and
- Tokens of appreciation for completing marketing surveys up to JPY1,000.

No other Gifts, Promotional Items, or Medical Education Items are permitted.

5. CONSULTING, SPEAKING, ADVISORY, AND OTHER SERVICES

There are no unique requirements for Japan. All rules in the *Integrity Code* apply.

6. TRANSPARENCY REPORTING REQUIREMENTS

All Illumina personnel are required to report TOVs provided to HCPs and HCOs in compliance with Japanese Law. Illumina personnel must familiarize themselves with these legal obligations prior to providing, or offering to provide, any Transfers of Value to an HCP or HCO. For details regarding these obligations, visit the “[Transparency Reporting](#)” section of the [Corporate Compliance Insider Page](#) or contact Compliance@Illumina.com.

When hosting events that include attendees or speakers from other countries, refer to the applicable regional addenda for reporting requirements.

7. ADDITIONAL REQUIREMENTS FOR JAPAN

No-Charge Product Framework: Evaluation Products to HCPs (“samples”)

Evaluation Products (Category 2 under the **No-Charge Product Framework**) may be offered free of charge to medical institutions so that the HCPs can confirm and evaluate efficacy and safety of the product under clinical testing use prior to routine use of the product, provided that the **No Charge Product Framework** and the following limits are followed:

- For consumables, not more than 1 kit should be supplied,
- For Dx and IVD products, Evaluation Products may not be provided for more than one month, and
- Evaluation Products may only be provided for use in clinical testing when a written request is submitted by an HCP.

All other interactions with HCPs and Government Officials in Japan that are not covered in this Regional Addendum are subject to the provisions of the *Integrity Code (CP500.16)*.

NEW ZEALAND

1. DEFINITIONS

Healthcare Professional (HCP): Any individual or entity involved in the provision of healthcare services and/or items to patients; which purchase, lease, recommend, use, arrange for the purchase or lease of, or prescribe medical technologies in New Zealand.

2. MEALS AND REFRESHMENTS

The following meal limits apply for HCPs and Government Officials:

| Types of Meals | Monetary Cap ¹² |
|--|----------------------------|
| Breakfast / Snack / Informal Lunch (Box) | NZD 50 |
| Formal Meals – Lunch or Dinner | NZD 125 |

3. TRAVEL AND ACCOMMODATIONS

There are no unique rules for New Zealand. All rules in the *Integrity Code* apply.

4. GIFTS, PROMOTIONAL ITEMS, AND MEDICAL EDUCATION ITEMS

HCPs: No Gifts or Promotional Items are permitted. Educational Items with a market value of less than NZD 100 are permitted.

Government Officials: The rules in the *Integrity Code* apply.

5. CONSULTING, SPEAKING, ADVISORY, AND OTHER SERVICES

There are no unique rules for New Zealand. All rules in the *Integrity Code* apply.

6. TRANSPARENCY REPORTING REQUIREMENTS

Illumina does not currently have transparency reporting requirements for New Zealand.

When hosting events that include attendees or speakers from other countries, refer to the applicable regional addenda for reporting requirements.

7. ADDITIONAL REQUIREMENTS FOR NEW ZEALAND

There are no additional rules for New Zealand.

All other interactions with HCPs and Government Officials in New Zealand that are not covered in this Regional Addendum are subject to the provisions of the *Integrity Code* (CP 500.16).

¹² These monetary caps are not inclusive of VAT and any service fee charges.

SINGAPORE

1. DEFINITIONS

Healthcare Professional (HCP): An individual or entity that purchases, leases, recommends, uses or arranges for the purchase or lease of, or prescribes a company's medical technologies. This includes both clinical and non-clinical individuals who make product-related decisions of the type described above and anyone with material influence over purchasing decisions.

2. MEALS AND REFRESHMENTS

HCPs: Under the Code of Ethical Conduct for Interactions with Healthcare Professionals by the Singapore Manufacturing Federation Medical Technology Industry Group, the following meal limits apply for HCPs:

| Meal / Refreshment | Limit per person per meal |
|--------------------|---------------------------|
| Breakfast | SGD 50 |
| Lunch | SGD 80 |
| Dinner | SGD 120 |
| Refreshments | SGD 30 |

The above meal limits exclude service charges and GST do not apply to meals occurring outside of Singapore.¹³

3. TRAVEL AND ACCOMMODATIONS

HCPs: Economy class tickets are required for travel with an aggregate flight time of less than 6 hours. For air travel with an aggregate flight time of 6 hours or more, business class tickets may be provided.

4. GIFTS, PROMOTIONAL ITEMS, AND MEDICAL EDUCATION ITEMS

HCPs: Only the following are permitted:¹⁴

Educational Items: Educational Items with a maximum value of SGD 100.

Promotional Items: Promotional Items that meet all the following criteria¹⁵ are permitted:

- Illumina-branded,
- Benefit patients or relate to an HCP's practice, and
- Do not exceed the maximum value of SGD 50.

Cultural Courtesies and Tokens of Appreciation: Plaques, flowers, and food items¹⁶ only, with a maximum value of SGD 100.

Government Officials: Only Illumina branded Gifts and Promotional Items under USD \$25 may be provided to Government Officials. Local laws require that Gifts and Promotional Items to certain

¹³ For HCP meals outside of Singapore, the local meal limit of the country where the meal is consumed applies.

¹⁴ The monetary values listed below exclude GST and other applicable taxes.

¹⁵ Permissible examples include Illumina-branded stationery items, branded USBs and other storage devices containing solely medical information for educational purposes, provided that they are worth less than SGD 50.

¹⁶ No alcohol.

Government Officials be declared. Check with Compliance prior to providing any Gift or Promotional Item to ensure that any required disclosures are made.

5. CONSULTING, SPEAKING, ADVISORY, AND OTHER SERVICES

There are no unique rules for Singapore. All rules in the *Integrity Code* apply.

6. TRANSPARENCY REPORTING REQUIREMENTS

Illumina does not currently have transparency reporting requirements for Singapore.

When hosting events that include attendees or speakers from other countries, refer to the applicable regional addenda for reporting requirements.

7. ADDITIONAL REQUIREMENTS FOR SINGAPORE

No-Charge Product Framework: Evaluation Products to HCPs (“samples”)

Evaluation Products (Category 2 under the **No-Charge Product Framework**) may be offered free of charge to HCOs and HCPs to familiarize them with the products and enable them to gain experience with the products in their practice prior to routine use, provided that the **No Charge Product Framework** and the following limits are followed:

- For consumables, not more than 1 kit should be supplied,
- The evaluation period should not exceed 90 days,
- Illumina must retain title to all instruments and multiple-use products during the evaluation period and remove the instrument or multiple-use Evaluation Products from the possession of the HCO or HCP at the end of the evaluation period, unless the HCO/HCP purchases or leases the instrument or multiple-use products, and
- Demonstration Products, if not meant for human use, should be marked “not for human use” or otherwise to indicate that they are solely for demonstration purposes.

All other interactions with HCPs and Government Officials in Singapore that are not covered in this Regional Addendum are subject to the provisions of the *Integrity Code* (CP 500.16).

SOUTH KOREA

1. DEFINITIONS

Healthcare Professional (HCP): Those persons permitted to engage in the provision of health and medical services or licensed or qualified under relevant health and medical services regulations pursuant to Item 3 of Article 3 of the Framework Act on Health and Medical Services, other than pharmacists and oriental medical doctors.

2. MEALS AND REFRESHMENTS

In addition to beer and wine, Soju may be provided to HCPs and Government Officials while in South Korea, provided that:

- A maximum of two 180 ml servings (i.e., one 360 ml bottle) of Soju per person are permitted, and
- The remainder of the rules regarding alcohol in Sections 2 and 5 of the *Integrity Code* are followed.

HCPs: Illumina may provide meals to Korean HCPs only under the circumstances described below. The maximum amount (per person) for meals to Korean HCPs may not exceed the following limits:

| Type of Event | | Monetary Caps |
|--|-------------------------------------|---|
| HCP attendees and presenters at Illumina Product Presentation / Education and Training ¹⁷ | Single Institution in attendance | KRW 100,000 per person per day, not to exceed four (4) times per month |
| | Multiple Institutions in attendance | KRW 100,000 per meal Maximum number of 3 meals per day, but may not exceed KRW 150,000 per HCP per day |
| Monetary cap per HCP per day shall cover all meals including breakfast, snacks, coffee, lunch and dinner altogether and total cost of all meals per day should not exceed such per day monetary cap. | | |

Third Party Educational Conferences:

- Illumina is not permitted to sponsor HCPs to attend Third Party Educational Conferences. This means that any type of support, including meals, is not permitted.
- Illumina product presentations and product education and training sessions taking place during a Third-Party Educational Conference is deemed a part of the conference. Therefore, meals may not be given to HCP attendees at these presentations and sessions.

Government Officials: A KRW 30,000 per day meal limit applies.

¹⁷ Not inclusive of VAT.

3. TRAVEL AND ACCOMMODATIONS

HCPs: Illumina may only provide travel or accommodations to HCPs under the circumstances below. Provision of or reimbursement for travel of Korean HCPs may not exceed the following limits:

| Type of Event | | Flights | Ground Transportation | Lodging |
|---|-------------------------------------|--------------------|--|--|
| HCP attendees and presenters at Illumina Product Presentations and Product Education and Training | Single institution in attendance | Not allowed | | |
| | Multiple Institutions in attendance | Economy class only | Reasonable costs for ground transportation such as KTX seats, express buses, or other forms of mass transportation to the destination, airport and transport between lodging and event location. | Up to KRW 200,000 per night (if domestic) Up to KRW 350,000 per night (if overseas) |

Third Party Educational Conferences:

- Illumina is not permitted to sponsor HCPs to attend Third Party Educational Conferences. This means that any type of support, including travel and accommodations, is not permitted.
- Illumina product presentations and product education and training sessions taking place during a Third-Party Educational Conference are deemed a part of the conference. Therefore, accommodation may not be given to HCP attendees at these presentations and sessions.

4. GIFTS, PROMOTIONAL ITEMS, AND MEDICAL EDUCATION ITEMS

HCPs: Promotional Items with Illumina logos and valued less than KRW 10,000 may be provided at Illumina organized events and third-party academic events and trade shows.

Government Officials: Gifts to facilitate performance of a public duty, or for social relationship, rituals, or assistance to festivities and funerals that do not exceed KRW 50,000 and otherwise meet the **Integrity Code** requirements for Gifts may be provided.

5. CONSULTING, SPEAKING, ADVISORY, AND OTHER SERVICES

South Korea has specific rules and requirements regarding engagement of HCPs and Government Officials for consulting, speaking, advisory, and other services. These rules and requirements are contained in Illumina’s **Engagement of Healthcare Professionals and Government Officials Policy and Fair Market Value Guidelines (CP 500.17)**.

6. TRANSPARENCY REPORTING REQUIREMENTS

All Illumina personnel are required to report TOVs provided to HCPs and HCOs in compliance with South Korea Law. Illumina personnel must familiarize themselves with these legal obligations prior to providing, or offering to provide, any Transfers of Value to an HCP or HCO. For details regarding these obligations, visit the “**Transparency Reporting**” section of the **Corporate Compliance Insider Page** or contact Compliance@Illumina.com.

When hosting events that include attendees or speakers from other countries, refer to the applicable regional addenda for reporting requirements.

7. ADDITIONAL REQUIREMENTS FOR SOUTH KOREA

Donations and Research and Educational Grants

Charitable Donation, Research Grants, and Educational Grants made to medical and medical device research institutions need to be made through the KMDIA pursuant to Article 7 of the KMDIA Fair Competition Code.

No Charge Product Framework

Discounted Commercial Transactions (Framework Category #1)

Discounts on commercial transactions to Korean HCPs and HCOs that do not comply with the criteria below are not permitted, unless reviewed and approved by the Legal department:

- Discounts are limited to the cases of allowed financial advantages provision under the Enforcement Rule of Medical Service Act and Enforcement Rule of Medical Devices Act.
- Price discounts must be provided to Korean HCPs and/or HCOs based on objective and reasonable grounds.
- The relevant transaction must be conducted using normal methods, including indicating the unit price and discounted unit price in the purchase order and tax invoice.
- The discount rate must not be excessive (e.g., substantial / heavy discounting, discounting below costs, etc.) in light of normal trade practices.
- The discount rate must be such that it can be reasonably explained based on the difference in marginal cost depending on supply quantities and market situation.

Evaluation Product (Framework Category #2)

Illumina products may be provided to HCOs in South Korea at no charge to enable the validation of their features free of charge (referred to as “Sample Products”) only under the following conditions:

- ◆ Sample Products must be provided in minimum packaging unit marked ‘sample’ in either Korean or English.
- ◆ Illumina, in any case, may not provide Sample Products exceeding the minimum amount or minimum period (in the case of re-usable products which are expected to be used for a fixed number of times) necessary for the purpose of validating the features of the concerned product, provided that such period shall not exceed one month from the date when an HCP becomes capable of using the Sample Product in practice.

- ◆ Illumina may provide Sample Products separately for demonstration and evaluation purposes; provided, however; (i) Sample Products for demonstration purposes must have “Not for Use on the Human Body,” or otherwise indicate that the product samples cannot be used for patients on their packing and documents attached thereto, and (ii) Sample Products for evaluation purposes must have “When used on a patient, cost may not be charged to the patient” on their packaging and documents attached thereto and shall only be provided to medical institutions after explaining the foregoing.

Sponsorship of Third-Party Educational Conferences

Illumina may sponsor Third Party Educational Conferences, provided that the following processes and rules are followed.

Domestic Third-Party Educational Conferences

- The organizer must cover 30% of the total cost of the Third-Party Educational Conference.
- The organizing institution or organization must submit a written request for sponsorship in a form provided by the KMDIA.
- The KMDIA will evaluate the conference request, identify member companies of KMDIA that wish to participate by public notice based on the evaluation, and notify the results to the requesting institution or organization as well as sponsoring companies.
- Illumina must provide sponsorship funds to the organizer of the Third-Party Educational Conference through the KMDIA (in no case such sponsorship be provided directly to the organizer).
- Within one month following the Third-Party Educational Conference, Illumina must submit a sponsorship report on form provided by the KMDIA.

Domestically held international Third-Party Educational Conferences

- A domestically held international Third-Party Educational Conference means a domestically held Third Party Educational Conference of an international scale lasting two or more days, attended by HCPs from at least five countries (HCPs attending as audience, not as presenter, chair or panelist, from five or more countries must come to South Korea) or attended by participants of which 150 or more are foreigners.
- The organizer must cover 30% of the total cost of the Third-Party Educational Conference.
- Illumina may provide sponsorship funds directly to the organizer of a domestically held international Third-Party Educational Conference by notifying the KMDIA in advance in a form provided by the KMDIA.
- Within one month following the Third-Party Educational Conference, Illumina must submit a sponsorship report on form provided by the KMDIA.
- In the case of Academic Conferences hosted by academic societies or academic institutions or organizations or research institutions related to (the practice of) medicines, standard booths fee are KRW 2 million per booth, and Illumina may pay up to KRW 3 million as a usage fee for one booth based on the nature, size, number of participants, etc. of the Academic Conference.
- In the case of Academic Conferences hosted by a Medical Institution, standard booth fees are KWR 500,000 per booth, and Illumina may pay up to KRW 1 million as a usage fee for one booth based on the nature, size, number of participants, etc. of the Academic Conference.

- One (1) booth per conference can be supported in principle, and up to two (2) booths per conference may be allowed considering the size of the Academic Conferences.

All other interactions with HCPs and Government Officials in South Korea that are not covered in this Regional Addendum are subject to the provisions of the *Integrity Code* (CP 500.16).

Thailand

1. DEFINITIONS

Healthcare Professional (HCP): Any individuals or organizations involved in the purchasing, hiring, recommending, using, supplying, renting out or ordering of medical devices.

2. MEALS AND REFRESHMENTS

The following meal limits apply for HCPs and Government Officials:

| Types of Meals | Monetary Caps ¹⁸ |
|----------------------------|-----------------------------|
| Breakfast, Lunch or Dinner | THB 3,000 |

3. TRAVEL AND ACCOMMODATIONS

All rules in the *Integrity Code* apply.

4. GIFTS, PROMOTIONAL ITEMS, AND MEDICAL EDUCATION ITEMS

HCPs:

Gifts to HCPs and institutions for customary and acceptable local occasions are permitted. The value of such gifts, the nature and type of which should be related to the particular customary occasion, must not exceed THB 3,000 per HCP.

Promotional Items carrying the Illumina name or logo and related to relevant to the practice of the HCPs are allowed. The value of the Promotional Items must not exceed THB 3,000 per HCP.

For Medical Education Items, the rules in the *Integrity Code* apply.

Government Officials: For Government Officials, the Gifts or Promotional Items not exceeding THB 3,000 in value per occasion and person which is meant for general public are allowed.

5. CONSULTING, SPEAKING, ADVISORY, AND OTHER SERVICES

No unique rules for Thailand. All rules in the *Integrity Code* apply.

6. TRANSPARENCY REPORTING REQUIREMENTS

Illumina does not currently have transparency reporting requirements for Thailand.

When hosting events that include attendees or speakers from other countries, refer to the applicable regional addenda for reporting requirements.

7. ADDITIONAL REQUIREMENTS FOR THAILAND

No additional requirements for Thailand.

¹⁸ These monetary caps are not inclusive of VAT and any service fee charges.

All other interactions with HCPs and Government Officials in Thailand that are not covered in this Regional Addendum are subject to the provisions of the *Integrity Code* (CP 500.16).

Europe Regional Addenda

MedTech Code Addendum

The MedTech Europe Code of Ethical Business Practice (“**MedTech Code**”) applies to all interactions and business conducted in the following Europe Geographic Area: **Austria, Belgium, Bulgaria, Croatia, Republic of Cyprus, Czech Republic, Denmark, Estonia, Finland, France, Germany, Greece, Hungary, Ireland, Italy, Latvia, Liechtenstein, Lithuania, Netherlands, Norway, Poland, Portugal, Romania, Slovakia, Slovenia, Spain, Sweden, Switzerland, Turkey, and the United Kingdom.**

When interacting with HCPs from the MedTech countries listed above, Illumina employees must follow the **Integrity Code**, this **MedTech Code Addendum**, and any requirements, limitations, or prohibitions contained in the **Regional Addenda** for the countries where the HCPs are licensed or employed.

- Where a rule in **Integrity Code** conflicts with a rule in this **MedTech Code Addendum**, the rule in the **MedTech Code Addendum** applies.
- Where a rule in **Integrity Code** or this **MedTech Code Addendum** conflicts with a rule contained in a country-specific **Regional Addendum**, the country-specific rule applies.

1. DEFINITIONS

Healthcare Professional (HCP): Any individual (with a clinical or non-clinical role; whether a government official, or employee or representative of a government agency or other public or private sector organization; including but not limited to, physicians, nurses, technicians, laboratory scientists, researchers, research coordinators or procurement professionals) that in the course of their professional activities may directly or indirectly purchase, lease, recommend, administer, use, supply, procure or determine the purchase or lease of, or who may prescribe medical technologies or related services.

Third Party Organized Educational Events: Activities of any type that are planned, budgeted, managed and executed in whole or in part by or on behalf of a person or entity other than Illumina to fulfil HCP medical educational needs.

2. MEALS AND REFRESHMENTS

Refreshments worth a maximum value of EUR 10 per person may be provided at congress and tradeshow booths to HCPs licensed or employed in all countries within the MedTech Europe Geographic Area, regardless of meal/refreshment rules contained in the country-specific **Regional Addenda**.

3. TRAVEL AND ACCOMMODATIONS

For HCPs licensed or employed in countries within the MedTech Europe Geographic Area, first class air travel is never appropriate.

4. GIFTS, PROMOTIONAL ITEMS, AND MEDICAL EDUCATION ITEMS

Gifts may not be provided to HCPs.

Educational and Promotional Items with a maximum value of EUR 10 (including VAT) may be provided to HCPs. The following rules apply to all Educational and Promotional Items:

- They may not be intended for personal use.
- They may not be provided in response to requests made by HCPs.
- They may not be given to mark significant life events (e.g., birthday, birth, wedding, etc.).
- They may not be given to an individual HCP more than three times per calendar year.
- If the maximum value in a **Regional Addendum** for the country in which an HCP is licensed or employed is different from the values listed above, the value in the **Regional Addendum** applies.

Illumina may occasionally provide Educational Items of greater value to an HCO provided:

- The item serves a genuine educational function for the HCPs at that HCO,
- The item is of benefit to patients,
- The item is related to Illumina's therapeutic areas,
- The item is not part of the HCO's normal overhead or routine cost of operation,
- Compliance approves the item in writing, and
- The provision of the item is transparently documented in Illumina's records.

All gifts, educational or promotional items provided to European beneficiaries, when allowed, must be tracked internally. Please consult Compliance before providing any Educational or Promotional Item and a member of the Compliance team will send you a link to a tracking document.

5. CONSULTING, SPEAKING, ADVISORY, AND OTHER SERVICES

The MedTech Code contains specific rules and requirements regarding engagement of HCPs for consulting, speaking, advisory, and other services. These rules and requirements are contained in Illumina's ***Engagement of Healthcare Professionals and Government Officials Policy and Fair Market Value Guidelines (CP 500.17)***

Employer Notification: MedTech Europe also requires prior written notification to the hospital administration, the HCP's superior or other locally designated competent authority, fully disclosing the purpose and scope of the interaction, which must be made prior to the engagement.

6. TRANSPARENCY REPORTING REQUIREMENTS

All Illumina personnel are required to report TOVs provided to HCPs and HCOs in compliance with the MedTech Code. Illumina personnel must familiarize themselves with these legal obligations prior to providing, or offering to provide, any Transfers of Value to an HCP or HCO. For details regarding these obligations, visit the "**Transparency Reporting**" section of the **Corporate Compliance Insider Page** or contact Compliance@illumina.com.

When hosting events that include attendees or speakers from other countries, refer to the applicable regional addenda for reporting requirements.

7. ADDITIONAL REQUIREMENTS FOR MEDTECH EUROPE COUNTRIES

Third-Party Organized Educational Events: Sponsorships, Educational Grants, Satellite Symposia and Conference Vetting System Requirements

Illumina may provide cash or in-kind support to Third-Party Organized Educational Events through

Sponsorships, Educational Grants, and/or the purchase of Satellite Symposia packages, provided that: (i) all applicable requirements in Illumina’s Grants (and Research Collaborations) Policy (CP 500.14) are followed, and (ii) the Event has approval via the **Conference Vetting System (CVS)**,¹⁹ where required. Annex 1 of the MedTech EU Code describes when CVS vetting and approval is required.²⁰

For events taking place in the MedTech Europe’s geographic area that are not considered eligible to CVS since attendees come from one country only, the event should follow the same criteria that CVS uses for approving events, and this should be done by the Illumina department in charge of the sponsorship.

The internal review by Illumina should follow the same criteria as CVS’s, which are:

- Scientific agenda: the scientific and/or educational topics should be the main focus and must not have substantial gaps. Non-scientific or non-educational content must not be part of the main agenda.
- Geographic location: The geographic location should be in or near a city or town which is a scientific or business center conducive to the exchange of ideas and the transmission of knowledge. The location must make logistical sense for the majority of the participants.
- Time of year: event must not take place during the local touristic season (wintertime for mountain cities, summertime for coastal cities).
- Venue: the venue should be conducive to the exchange of information and cannot be the main reason for attendees participating in the event. The perceived image of the location must not be luxury, or tourist/holiday-oriented, or a location associated with entertainment.
- Hospitality: hospitality must be only for participating in the event. No entertainment is possible.
- Participants registration fees: the registration fees for participants should cover only the scientific program, authorized activities, and hospitality.
- Program advertising: advertising support (brochures, website and other materials) should highlight the scientific nature of the scientific content. They should not emphasize the geographic location and should not make excessive or inappropriate references to or contain images of entertainment, sporting events or other non-scientific activities.

All criteria are available on CVS’s website at <https://www.ethicalmedtech.eu/conference-vetting-system/assessment-criteria/>. Illumina may not provide support directly to HCPs to attend Third Party Organized Educational Events (e.g., through Sponsorships or Educational Grants).

¹⁹ The Conference Vetting System (CVS) reviews the compliance of Third Party Organized Educational Events with the MedTech EU Code.

²⁰ To request CVS approval for a Third Party Organized Educational Event: visit <https://www.ethicalmedtech.eu/conference-vetting-system/objective/> and click on “SUBMIT A CONFERENCE”. Submissions containing the minimum information (geographic location and the exact conference venue) must be made no later than 75 days prior to the event starting date, via an online form.

Charitable Donations

illumina may not provide Charitable Donations to individual HCPs. Charitable Donations must be provided directly to a qualifying organization or entity. Charitable Donations may not be provided in response to requests made by HCPs, unless the HCP is an employee or officer of a qualifying organization or entity and submits the request in writing on behalf of the qualifying organization or entity.

All other interactions with HCPs and Government Officials in the MedTech EU Countries that are not covered in this Regional Addendum are subject to the provisions of the MedTech Code Addendum and the *Integrity Code* (CP 500.16).

BELGIUM

1. DEFINITIONS

Healthcare Professional (HCP): Anyone in the healthcare sector who distributes, purchases (or prepares for purchase), prescribes, recommends, delivers or administers medicinal products and/or distributes, purchases (or prepares for purchase), rents-out (or prepares for renting), recommends, uses or prescribes medical devices, including institutions in which one or more of these activities take place. This wide definition specifically includes also non-medical staff such as hospital management (directors, procurement), laboratory personnel (laboratory directors, bio-medical operatives) and wholesalers, this in addition to traditional HCPs (e.g., doctors, pharmacists, vets, dentists, nurses, midwives, therapeutical professionals).

2. MEALS AND REFRESHMENTS

HCPs:

Providing business meals to HCPs during sales or promotional meetings and events is prohibited.

Meals and refreshments may only be provided to HCPs in relation to a formal educational or scientific meeting or event. In addition, meals may only be provided if the meal immediately precedes the start of scientific or educational activities or immediately follows the end of the activities. Meals may not be provided under the following circumstances:

- Lunch before an event that starts after 2:30pm;
- Dinner after an event that ends before 5:30pm; or
- Dinner the evening before the event if the event starts after 10am the day after.

The meal limit for HCPs is dependent on the duration of the scientific or educational event:

- EUR 23 per hour of scientific content, with a maximum daily allowance of EUR135;
- Individual meals are limited to EUR 45 for lunch (drinks included), EUR 90 for dinner (drinks included), and EUR 23 for a coffee break, and must be within the authorized daily allowance; and
- All logistical expenses related to the organization of the meals must be included in the hourly and daily allowances (e.g., service fee, room rental, VAT, media equipment renting, etc.).

If the meal is taking place abroad, and Belgian HCPs represent less than half of HCPs present at the meal, a higher meal limit could be offered. Please consult with a member of the Compliance team prior to inviting Belgian HCPs for a meal abroad.

3. TRAVEL AND ACCOMMODATIONS

HCPs:

Mdeon Visa Requirement: Belgium has specific rules and requirements regarding travel and accommodation for HCPs, and any hospitality provided to a Belgian HCP must obtain a formal authorization (known as a Visa) from the Belgian authority (Mdeon) under the circumstances described below. The Visa is applicable to the event, not to the individual HCPs, and requests for an event will cover all HCP participants.

- The visa obligation applies to any event that requires an overnight stay, even if the event takes place on one single day (or less) but requires an overnight stay due to the specific circumstances of the event. For example, the visa obligation applies if the event takes place abroad, thus

requiring participants to arrive the night before in order to be punctual for the start of the event or to arrive home the day after the event.

- Visa requests must be submitted to Mdeon at least 15 calendar days before the start of the event, and Illumina must wait to obtain a formal approval before formalizing travel arrangements for the HCPs. Due to this requirement, please ensure sufficient lead time for the Compliance department to submit the Visa to Mdeon. Each Visa request has a cost of approximately EUR 300 per event, which will be paid by the requesting department.²¹

Airfare: Business class may only be provided if the HCP is an Illumina consultant, and the flight time is over six hours.

Ground Transportation:

- Belgian HCPs are allowed to travel with their own vehicle for travel below 500km at a maximum reimbursement rate of EUR 0,42 per kilometer.
- Transportation expenses to/from a Belgian airport or train station (taxi or mileage) or parking fare at such destinations may be reimbursed to consultants only.
- Reasonable transfer/taxi costs abroad can be reimbursed to all Belgian HCPs, but HCPs travelling together are encouraged to share transportation costs when possible.

4. GIFTS, PROMOTIONAL ITEMS, AND MEDICAL EDUCATION ITEMS

HCPs:

Educational Items and Promotional items with a maximum individual value of EUR 50 including VAT and a cumulative value of EUR 125 tax included per calendar year may be provided to HCPs, provided that the following criteria are met:

- The item must relate to the practice of the HCP's profession,
- The item must be provided for use of the practice or department and not for individual use, and
- The item must not be linked to celebrating a private event (birthday, wedding, birth).

Please consult Compliance before providing any Educational or Promotional Item and a member of the Compliance team will send you a link to a tracking document.

5. CONSULTING, SPEAKING, ADVISORY, AND OTHER SERVICES

Belgium has specific rules and requirements regarding engagement of HCPs and Government Officials for consulting, speaking, advisory, and other services. In particular, when engaging an HCP from Belgium for an event that will require an overnight stay, the Mdeon Visa requirement described in Section 3 of this Belgium Addendum will apply. These rules and requirements are contained in Illumina's *Engagement of Healthcare Professionals and Government Officials Policy and Fair Market Value Guidelines (CP 500.17)*.

6. TRANSPARENCY REPORTING REQUIREMENTS

All Illumina personnel are required to report TOVs provided to HCPs and HCOs in compliance with the Belgian Sunshine Act. Illumina personnel must familiarize themselves with these legal obligations prior to providing, or offering to provide, any Transfers of Value to an HCP or HCO. For details regarding these

²¹Payment can be made with corporate credit cards. Compliance can prepare the submission and liaise with the requesting department for the credit card details.

obligations, visit the **“Transparency Reporting”** section of the **Corporate Compliance Insider Page** or contact Compliance@illumina.com.

When hosting events that include attendees or speakers from other countries, refer to the applicable regional addenda for reporting requirements.

7. ADDITIONAL REQUIREMENTS FOR BELGIUM

Scientific and Educational Events

Belgium has specific rules regarding the minimum contents for scientific events and require that scientific or educational program agendas be detailed and broken down in units of 20 to 30 minutes and show date and place of the meeting, the titles of each topic, and names of the speakers. Contents of the agenda must be detailed and clear enough to be able to be understood by an external reader.

All other interactions with HCPs and Government Officials in Belgium that are not covered in this Regional Addendum are subject to the provisions of the MedTech Code Addendum and the *Integrity Code* (CP 500.16).

FRANCE

1. DEFINITIONS

Healthcare Professional (HCP) are defined under the French anti-gift law targeting specific professionals and are comprised of four categories:

- HCPs with an individual “RPPS” number: Medical doctors, pharmacists, nurses, dentists, masseur-physiotherapists, chiropodists
- HCPs with an individual “ADELI” number: laboratory technicians, physicians, psychomotor and speech therapists, radiology manipulators, hearing aid specialists, orthoptists, opticians and eyewear, prosthetists and orthotists for equipment for disabled people, dieticians, childcare auxiliaries, dental assistants.
- Other HCPs without individual identification number: genetic counselors, paramedics, veterinarians and occupational therapists.
- Associations of HCPs: non-profit organizations and scientific societies that are managed by HCPs.

2. MEALS AND REFRESHMENTS

HCPs:

Meals may only be provided to HCPs if the HCP attends an educational or promotional meeting or event that includes 90 minutes of content. If the interaction with the HCP includes less than 90 minutes of content, a meal may not be provided. All meals must meet the requirements below:

Impromptu Meals and Refreshments: Meals and refreshments that are not tied to a planned event can be provided if the following conditions are met:

- The meal/refreshment must be linked to a commercial discussion that happened just before the lunch hours (from 12pm to 2pm);
- The value of the meal/refreshments is limited to EUR 30 per person;
- Only two meals/refreshments per calendar year may be provided to a single HCP by any Illumina employees;
- Receipt of meals/refreshments must be tracked in a signed attendance sheet and a formal tracking must be organized by the sales and marketing department; and
- Impromptu meals may be offered to active HCPs only, and cannot be offered to students, retired HCPs, or any other employee from the HCP’s practice (e.g., administrative staff, nurses).

Planned Meals and Refreshments: All planned meals and refreshments must go through either the **declaration** process or the **authorization** process, depending on the value of the meal or refreshment and the total value of all hospitality (meals, travel, and accommodations) provided to an HCP in relation to a particular event. See Section 7 of this **French Addendum** for the detailed requirements.

3. TRAVEL AND ACCOMMODATIONS

HCPs: All travel and accommodations must go through either the **declaration** process or the **authorization** process, depending on the total value of all hospitality (meals, travel, and accommodations) provided to an HCP in relation to a particular event. See Section 7 of this **French Addendum** for the detailed requirements.

4. GIFTS, PROMOTIONAL ITEMS, AND MEDICAL EDUCATION ITEMS

HCPs:

Educational Items and Promotional items with a maximum value of EUR 20 including VAT per calendar year may be provided to HCPs, if they relate to the practice of the HCP's profession.

Books, magazines, or subscriptions may be provided to HCPs with a limit of EUR 30 per item, with an annual cumulative limit of EUR 150, if they relate to the HCP's practice and are provided for use by the practice or department and not for individual use.

Please consult Compliance before providing any Educational or Promotional Item and a member of the Compliance team will send you a link to a tracking document.

5. CONSULTING, SPEAKING, ADVISORY, AND OTHER SERVICES

France has specific rules and requirements regarding engagement of HCPs and Government Officials for consulting, speaking, advisory, and other services. In particular, France has a mandatory disclosure process (similar to that for hospitalities) for consulting agreements that exceed specified monetary thresholds. These rules and requirements are contained in Illumina's *Engagement of Healthcare Professionals and Government Officials Policy and Fair Market Value Guidelines (CP 500.17)*.

6. TRANSPARENCY REPORTING REQUIREMENTS

All Illumina personnel are required to report TOVs provided to HCPs and HCOs in compliance with the law 2011-2012 from December 29th, 2011, also known as the "Loi Bertrand". Illumina personnel must familiarize themselves with these legal obligations prior to providing, or offering to provide, any Transfers of Value to an HCP or HCO. For details regarding these obligations, visit the "Transparency Reporting" section of the **Corporate Compliance Insider Page** or contact Compliance@illumina.com.

When hosting events that include attendees or speakers from other countries, refer to the applicable regional addenda for reporting requirements.

7. ADDITIONAL REQUIREMENTS FOR FRANCE

HCP Hospitality Agreements – Declaration and Authorization

Except for impromptu meals and refreshments meeting the criteria listed in Section 2 of this **French Addendum** above, all hospitality (including meals, refreshments, travel, and accommodations) provided to a French HCP must be documented in a hospitality or consulting agreement²² and be disclosed to the French authorities before the hospitality is provided.

Depending on the value of the hospitality, Illumina will either be required to **declare** the hospitality (8 calendar days before the start of the event) or obtain **authorization** from the French authorities (2 calendar months before the start of the event) before the hospitality can be provided. All disclosure and authorization deadlines must be followed, as Illumina may be subject to fines and penalties if

²² If an HCP is engaged as a consultant for Illumina, hospitality may be included in the consulting agreement (i.e., a separate hospitality agreement is not required).

hospitalities are not declared before they are provided, and late declarations will be systematically rejected.

Declaration only is required, provided that: (1) the total value of all transfers of value in the agreement (honorarium, hospitality and/or event registration) will not exceed EUR 2000, and (2) none of the following sub-limits will be exceeded:

- Honorarium: net hourly rate higher than 200 euros, net half day rate higher than 800 euros or overall net compensation higher than 2000 euros, where a half working day is defined in France as 4 hours max;
- Meal (drinks included): EUR 50;
- Refreshment break: EUR 15 per break, up to two breaks per day; or
- Lodging (accommodations): EUR 150 per night, breakfast included;
- Event registration: EUR 1000

If the total amount of the planned transfer of value to be provided in the agreement is in excess of EUR 2000, or if any of the sub-limits listed above will be exceeded, Illumina must obtain **authorization** from the French authorities before providing any hospitality.

Hospitality may be offered to active HCPs only, and cannot be offered to students, retired HCPs, or HCPs that are licensed in a different country but temporarily working in France as part of a fellowship or international exchange program, even if the hospitality is tied to a consulting agreement.

Sponsorships – Declaration and Authorization

All Sponsorships to French HCOs or organizations must go through either the declaration process or the authorization process, depending on the value of the Sponsorship. Sponsorships exceeding (1) EUR 200 per hour of sponsored event, (2) EUR 800 per half day of sponsored event, or (3) EUR 2000 in total must obtain **authorization** from the French authorities in advance of providing the Sponsorship. All other Sponsorships must be **declared** to the French authorities in advance of providing the Sponsorship.

Research and Educational Grants – Declaration and Authorization

All Research and Educational Grants to French HCOs and organizations must go through either the declaration process or the authorization process, depending on the value of the Grant. Grants (1) related to healthcare, science, or research and development in excess of EUR 8000, and (2) not related to healthcare, science, or research and development in excess of EUR 1000 must obtain **authorization** from the French authorities in advance of providing the Grant. All other Grants must be **declared** to the French authorities in advance of providing the Grant.

Charitable Donations – Declaration and Authorization

All Charitable Donations to French HCOs and non-profit organizations must go through either the declaration process or the authorization process, depending on the value of the Donation. Donations (1) related to healthcare, science, or research and development in excess of EUR 8000, and (2) not related to healthcare, science, or research and development in excess of EUR 1000 must obtain **authorization** from the French authorities in advance of providing the Donation. All other Donations must be **declared** to the French authorities in advance of providing the Donation.

Agreements Must be in French

All agreements that will be signed by a French beneficiary (e.g., hospitality or consulting agreements), must be written in French or in a bilingual version with French being the reference language.²³

All other interactions with HCPs and Government Officials in France that are not covered in this Regional Addendum are subject to the provisions of the MedTech Code Addendum and the *Integrity Code* (CP 500.16).

²³ The only document that might be accepted in English only are the scientific or educational program of an international event, whether organized by Illumina or an external third party.

GERMANY

1. DEFINITIONS

Healthcare Professional (HCP): doctors and pharmacists, as well as all members of the medical, dental or other health professions and all other persons who, in the course of their professional activities, actively prescribe, apply, use or trade medical devices in a permitted manner.

2. MEALS AND REFRESHMENTS

HCPs:

- Meals and refreshments may only be provided in relation to formal educational or scientific events. Business meals are strictly prohibited (e.g., during sales or promotional meetings).
- The meal limit recommendation is EUR 75. When travelling abroad, if the destination meal limit is higher than the German limit, the higher meal limit is permitted if it is justified in writing.
-

3. TRAVEL AND ACCOMMODATIONS

No unique rules for Germany. All rules in the *Integrity Code* and *MedTech Code Addendum* apply.

4. GIFTS, PROMOTIONAL ITEMS, AND MEDICAL EDUCATION ITEMS

In addition to following all the rules in Section 2 of the *MedTech Code Addendum*, all Educational and Promotional Items should be recorded in writing.

Please consult Compliance before providing any Educational or Promotional Item and a member of the Compliance team will send you a link to a tracking document.

5. CONSULTING, SPEAKING, ADVISORY, AND OTHER SERVICES

Germany has specific rules and requirements regarding engagement of HCPs and Government Officials for consulting, speaking, advisory, and other services. These rules and requirements are contained in Illumina's *Engagement of Healthcare Professionals and Government Officials Policy and Fair Market Value Guidelines (CP 500.17)*.

6. TRANSPARENCY REPORTING REQUIREMENTS

Illumina does not currently have transparency reporting requirements specific to Germany. However, the MedTech reporting requirements do apply.

When hosting events that include attendees or speakers from other countries, refer to the applicable regional addenda for reporting requirements.

7. ADDITIONAL REQUIREMENTS FOR GERMANY

There are no additional requirements for Germany.

All other interactions with HCPs and Government Officials in Germany that are not covered in this Regional Addendum are subject to the provisions of the MedTech Code Addendum and the *Integrity Code* (CP 500.16).

ITALY

1. DEFINITION

Healthcare Professional (HCP): any individuals performing their professional activities within the healthcare sector, whether public and/or private, (including, but not limited to, physicians, nurses, laboratory scientists, technicians, administrative employees within the healthcare structures, etc.), that in the course of their professional activities may directly or indirectly purchase, lease, recommend, administer, use, supply, procure or determine the purchase, lease or prescription of medical technologies or related services.

2. MEALS AND REFRESHMENTS

No unique rules for Italy. All rules in the *Integrity Code* apply.

3. TRAVEL AND ACCOMMODATIONS**HCPs:**

- Travel and hotel stays occurring more than 24 hours before or after a meeting or event may not be provided to HCPs.
- A four-star hotel is the maximum allowed for HCPs.
- All flights provided to HCPs should be economy class, except business class is permitted for speakers or moderators included in the official agenda of an event when traveling on intercontinental flights of more than six consecutive hours. This exclusion does not apply to HCPs presenting posters only.

Government Officials:

- Travel and hotel stays occurring more than 24 hours before or after a meeting or event may not be provided to Government Officials.
- A four-star hotel is the maximum allowed for Government Officials.

4. GIFTS, PROMOTIONAL ITEMS, AND MEDICAL EDUCATION ITEMS

All Educational Items and Promotional Items must be tracked and documented internally so that the documentation can be made available to authorities upon request.

Please consult Compliance before providing any Educational or Promotional Item and a member of the Compliance team will send you a link to a tracking document.

5. CONSULTING, SPEAKING, ADVISORY, AND OTHER SERVICES

Italy has specific rules and requirements regarding engagement of HCPs and Government Officials for consulting, speaking, advisory, and other services. These rules and requirements are contained in Illumina's *Engagement of Healthcare Professionals and Government Officials Policy and Fair Market Value Guidelines (CP 500.17)*.

6. TRANSPARENCY REPORTING REQUIREMENTS

All Illumina personnel are required to report TOVs provided to HCPs and HCOs in compliance with the Italian Sunshine Act (Law 62/2022). Illumina personnel must familiarize themselves with these legal obligations prior to providing, or offering to provide, any Transfers of Value to an HCP or HCO. For details regarding these obligations, visit the **“Transparency Reporting”** section of the **Corporate Compliance Insider Page** or contact Compliance@Illumina.com.

When hosting events that include attendees or speakers from other countries, refer to the applicable regional addenda for reporting requirements.

7. ADDITIONAL REQUIREMENTS FOR ITALY

Educational Grants and Events

Italian Government Officials require written authorization by their relevant public administration in advance of receiving any educational grant or support to participate in an educational event.

Events

Italian HCPs are forbidden to attend events that will take place in touristic locations and the following locations are banned during specific periods of time:

- Seaside locations from June 1st to September 30th
- Mountain locations from December 15th to March 31st and June 15th to September 15th

The prohibition does not apply to the Regional and Provincial Capitals seat of prominent hospitals and universities, provided that the event will take place in a professional location.

Conference Vetting

The Italian Confindustria has its own conference vetting system, known as the *“Sistema di Valutazione delle Conferenze”* (SVC). This vetting system is similar to MedTech’s CVS vetting system and applies to events taking place in Italy where only Italian HCPs are in attendance. International events taking place in Italy will be reviewed under MedTech’s CVS.

All other interactions with HCPs and Government Officials in Italy that are not covered in this Regional Addendum are subject to the provisions of the MedTech Code Addendum and the Integrity Code (CP 500.16).

NETHERLANDS

1. DEFINITIONS

Healthcare Professional (HCP): healthcare professionals, other care professionals, patient organizations and other interested parties who directly or indirectly may influence the prescription, supply and/or usage of medicinal products.

2. MEALS AND REFRESHMENTS

HCPs:

- For HCP attendees at scientific or educational meetings taking place in the Netherlands, the meal limit is EUR 75 per event, drinks included. If the scientific or educational meeting takes place abroad, the stricter limit of the two countries will apply.
- For HCP attendees at promotional meetings, the meal limit is EUR 75 per event, with a maximal annual cumulative limit of EUR 375.
- For HCPs engaged as consultants, the meal limit is EUR 75 per meal, drinks included. If the meal takes place abroad, the stricter limit of the two countries will apply. There is no annual meal limit for consultants.

3. TRAVEL AND ACCOMODATIONS

HCPs:

Travel and accommodations may only be provided to HCPs that Illumina engages as consultants and HCPs that will be attendees at Illumina scientific/educational (non-promotional) events.

The following rules apply to both Illumina consultants and attendees of Illumina scientific/educational events:

- Mileage reimbursement is capped at EUR 0,37 per kilometer; and
- Business class airfare is only permitted for intercontinental flights lasting at least 5 hours.

For HCPs that will be invited to Illumina scientific/educational events as attendees, a maximum of EUR 500 worth of travel and accommodations may be provided per event, with an annual limit of EUR 1500 per HCP.

4. GIFTS, PROMOTIONAL ITEMS, AND MEDICAL EDUCATION ITEMS

Educational and Promotional Items with a maximum value of EUR 50 including VAT may be provided to HCPs, provided that not more than three such items are provided to any individual HCP per calendar year.

Please consult Compliance before providing any Educational or Promotional Item and a member of the Compliance team will send you a link to a tracking document.

5. CONSULTING, SPEAKING, ADVISORY, AND OTHER SERVICES

The Netherlands has specific rules and requirements regarding engagement of HCPs and Government Officials for consulting, speaking, advisory, and other services. These rules and requirements are contained in Illumina's *Engagement of Healthcare Professionals and Government Officials Policy and Fair Market Value Guidelines (CP 500.17)*.

6. TRANSPARENCY REPORTING REQUIREMENTS

All Illumina personnel are required to report TOVs provided to HCPs and HCOs in compliance with the Dutch Sunshine law. Illumina personnel must familiarize themselves with these legal obligations prior to providing, or offering to provide, any Transfers of Value to an HCP or HCO. For details regarding these obligations, visit the “**Transparency Reporting**” section of the **Corporate Compliance Insider Page** or contact Compliance@Illumina.com.

When hosting events that include attendees or speakers from other countries, refer to the applicable regional addenda for reporting requirements.

7. ADDITIONAL REQUIREMENTS FOR THE NETHERLANDS

No additional requirements for the Netherlands.

All other interactions with HCPs and Government Officials in the Netherlands that are not covered in this Regional Addendum are subject to the provisions of the MedTech Code Addendum and the *Integrity Code* (CP 500.16).

UNITED KINGDOM

1. DEFINITIONS

Healthcare Professional (HCP): Any individual with a clinical or non-clinical role, whether a government official or representative of a government agency or other public or private sector organization, including but not limited to, physicians, nurses, technicians, laboratory scientists, researchers, research coordinators or procurement professionals, that in the course of their professional activities may directly or indirectly purchase, lease, recommend, administer, use, supply, procure or determine the purchase or lease of, or who may prescribe health technologies or related services.

2. MEALS AND REFRESHMENTS

Meals and refreshments to HCPs may not exceed GBP 75 per person.

3. TRAVEL AND ACCOMMODATIONS

Travel and accommodations may only be provided to HCPs and Government Officials in the course of scientific or educational events.

4. GIFTS, PROMOTIONAL ITEMS, AND MEDICAL EDUCATION ITEMS

Educational and Promotional Items to HCPs may not exceed GBP 6. All Educational and Promotional Items must be tracked and registered in writing.

Please consult Compliance before providing any Educational or Promotional Item and a member of the Compliance team will send you a link to a tracking document.

5. CONSULTING, SPEAKING, ADVISORY, AND OTHER SERVICES

No unique rules for the United Kingdom. All rules in the *Integrity Code* and *MedTech Code Addendum* apply.

6. TRANSPARENCY REPORTING REQUIREMENTS

Illumina does not currently have transparency reporting requirements specific to the United Kingdom. However, the MedTech reporting requirements do apply.

When hosting events that include attendees or speakers from other countries, refer to the applicable regional addenda for reporting requirements.

7. ADDITIONAL REQUIREMENTS FOR THE UNITED KINGDOM

No additional requirements for the United Kingdom.

All other interactions with HCPs and Government Officials in the United Kingdom that are not covered in this Regional Addendum are subject to the provisions of the MedTech Code Addendum and the Integrity Code (CP 500.16).

Greater China Regional Addenda

MAINLAND CHINA

1. DEFINITIONS

Civil Servants “公务员”: Civil Servants are categorized as Government Officials but who are subject to more stringent restrictions under local laws, including but not limited to Law of the PRC on Civil Servants(公务员法) and Regulation on Scope of Civil Servants(公务员范围规定) HCPs employed by government hospital/university/research center are normally out of scope.

2. MEALS AND REFRESHMENTS

HCPs and Government Officials: The maximum amount (per person) for meals to HCPs should not exceed:

| Type of Meal | Monetary Caps (tax and service fee inclusive) |
|--------------|--|
| Breakfast | CNY 200 |
| Lunch | CNY 300 |
| Dinner | CNY 500 (Dinner location in Shanghai, Beijing, Guangzhou, Shenzhen) CNY 300 (Dinner location in other cities of Mainland China) |
| Tea Break | CNY 100 (maximum twice a day) |

In addition, the following rules apply to Civil Servants that are defined under local laws:

- Meals should be pre-approved by Legal/Compliance.
- The Civil Servants must ensure that they have obtained their employer’s approval for the meal.

3. TRAVEL AND ACCOMMODATIONS

No unique rules for Mainland China. All rules in the *Integrity Code* apply.

4. GIFTS, PROMOTIONAL ITEMS, AND MEDICAL EDUCATION ITEMS

HCPs:

Promotional Items may be provided to HCPs, if they are Illumina-branded and have a maximum value of CNY 100. Please refer to Compliance regional guidance subpage: “*Insider - Corporate Compliance Homepage - Regional Guidelines & Information - China Specific Guidelines & Information - Approved Promotional Item Catalog*” for detailed reference.

Educational Items may be provided to HCPs, if they have a maximum value of CNY 500 and are not Illumina-branded.

Government Officials:

Gifts may not be provided to Government Officials.

Promotional Items may be provided to Government Officials if they are Illumina- branded and have a maximum value of CNY 100. Please refer to the Regional Guidance subpage: ***“Insider - Corporate Compliance Homepage - Regional Guidelines & Information - China Specific Guidelines & Information - Approved Promotional Item Catalog”*** for detailed reference.

5. CONSULTING, SPEAKING, ADVISORY, AND OTHER SERVICES**Consulting/Advisory/other Services:**

Please refer to Illumina’s ***Engagement of Healthcare Professionals and Government Officials Policy and Fair Market Value Guidelines (CP 500.17)***

Speaker Fee:

Please refer to Compliance regional guidance subpage: ***“Insider - Corporate Compliance Homepage - Regional Guidelines & Information - China Specific Guidelines & Information - Greater China Guidelines on FMV for Speaker Fees”*** for detailed reference.

6. TRANSPARENCY REPORTING REQUIREMENTS

Illumina does not currently have transparency reporting requirements for Mainland China.

When hosting events that include attendees or speakers from other countries, refer to the applicable regional addenda for reporting requirements.

7. ADDITIONAL REQUIREMENTS FOR MAINLAND CHINA**No-Charge Product Framework: Evaluation Products to HCPs**

Evaluation Products (Category 2 under the **No-Charge Product Framework**) may be offered free of charge to medical institutions so that the HCPs can confirm and evaluate efficacy and safety of the product under clinical testing use prior to routine use of the product, provided that the **No Charge Product Framework** and the following limits are followed:

- For consumables, not more than one (1) kit should be supplied, and
- For instruments, the evaluation period should not exceed 90 days.

All other interactions with HCPs and Government Officials in Mainland China that are not covered in this Regional Addendum are subject to the provisions of the *Integrity Code (CP 500.16)*.

HONG KONG

1. HCP DEFINITION

No unique definitions for Hong Kong. All rules in the *Integrity Code* apply.

2. MEALS AND REFRESHMENTS

The maximum amount (per person) for meals to HCPs and Government Officials should not exceed:

| Type of Meal | Monetary Caps (tax and service fee inclusive) |
|--------------|---|
| Breakfast | HKD 400 |
| Lunch | HKD 400 |
| Dinner | HKD 800 |
| Tea Break | HKD 120 (maximum twice a day) |

3. TRAVEL AND ACCOMMODATIONS

No unique rules for Hong Kong. All rules in the *Integrity Code* apply.

4. GIFTS AND MEDICAL EDUCATION ITEMS

HCPs:

Promotional Items may be provided to HCPs, if they are related to the HCP's practice and/or entail a benefit to patients and do not exceed the value of HKD 150 per item.

Educational Items may only be given to hospitals or private group practices, and no more than HKD 5000 worth of Educational Items may be provided to a particular hospital department or private group practice per year.

Government Officials:

Gifts and Promotional Items may not be provided to Government Officials.

5. CONSULTING, SPEAKING, ADVISORY, AND OTHER SERVICES

Consulting/Advisory/other Services:

Please refer to Illumina's *Engagement of Healthcare Professionals and Government Officials Policy and Fair Market Value Guidelines (CP 500.17)*

Speaker Fee:

Please refer to Compliance regional guidance subpage: "*Insider - Corporate Compliance Homepage - Regional Guidelines & Information - China Specific Guidelines & Information - Greater China Guidelines on FMV for Speaker Fees*" for detailed reference.

6. TRANSPARENCY REPORTING REQUIREMENTS

Illumina does not currently have transparency reporting requirements for Hong Kong.

When hosting events that include attendees or speakers from other countries, refer to the applicable regional addenda for reporting requirements.

7. ADDITIONAL REQUIREMENTS FOR HONG KONG

No-Charge Product Framework: Evaluation Products to HCPs

Evaluation Products (Category 2 under the **No-Charge Product Framework**) may be offered free of charge to medical institutions so that the HCPs can confirm and evaluate efficacy and safety of the product under clinical testing use prior to routine use of the product, provided that the **No Charge Product Framework** and the following limits are followed:

- For consumables, not more than one (1) kit should be supplied, and
- For instruments, the evaluation period should not exceed 90 days.

All other interactions with HCPs and Government Officials in Hong Kong that are not covered in this Regional Addendum are subject to the provisions of the *Integrity Code (CP 500.16)*.

TAIWAN

1. HCP DEFINITION

No unique definitions for Taiwan. All rules in the *Integrity Code* apply.

2. MEALS AND REFRESHMENTS

The maximum amount (per person) for meals to HCPs and Government Officials should not exceed:

| Types of Meals | Monetary Caps (tax and service fee inclusive) | |
|---------------------|---|-----|
| | TWD | USD |
| Breakfast & Lunch | 1,000 | 33 |
| Dinner | 2,500 | 83 |
| Tea break | 250* (maximum twice a day) | 8 |
| Total Spend per day | 3,500 | 116 |

*If there is a tea break arranged, please adjust the spend on breakfast/lunch/dinner to ensure the total spend per day per person will not exceed TWD 3,500.

3. TRAVEL AND ACCOMMODATIONS

No unique rules for Taiwan. All rules in the *Integrity Code* apply.

4. GIFTS, PROMOTIONAL ITEMS, AND MEDICAL EDUCATION ITEMS

HCPs:

The rules in the *Integrity Code* apply.

Government Officials:

Gifts may not be provided to Government Officials.

Promotional Items below TWD 500 may be provided to Government Officials.

5. CONSULTING, SPEAKING, ADVISORY, AND OTHER SERVICES

Consulting/Advisory/other Services:

Please refer to Illumina's *Engagement of Healthcare Professionals and Government Officials Policy and Fair Market Value Guidelines (CP 500.17)*

Speaker Fee:

Please refer to Compliance regional guidance subpage: "*Insider - Corporate Compliance Homepage - Regional Guidelines & Information - China Specific Guidelines & Information - Greater China Guidelines on FMV for Speaker Fees*" for detailed reference.

6. TRANSPARENCY REPORTING REQUIREMENTS

Illumina does not currently have transparency reporting requirements for Taiwan.

When hosting events that include attendees or speakers from other countries, refer to the applicable regional addenda for reporting requirements.

7. ADDITIONAL REQUIREMENTS FOR TAIWAN

No-Charge Product Framework: Evaluation Products to HCPs

Evaluation Products (Category 2 under the **No-Charge Product Framework**) may be offered free of charge to medical institutions so that the HCPs can confirm and evaluate efficacy and safety of the product under clinical testing use prior to routine use of the product, provided that the **No Charge Product Framework** and the following limits are followed:

- For consumables, not more than one (1) kit should be supplied, and
- For instruments, the evaluation period should not exceed 90 days.

All other interactions with HCPs and Government Officials in Taiwan that are not covered in this Regional Addendum are subject to the provisions of the *Integrity Code* (CP 500.16).



Integrity Code Appendix 2 No Charge Product Framework

For purposes of the No Charge Product Framework, “product” includes any services and software sold by Illumina.

Illumina Global ‘No-Charge Product Framework’ – Summary (current as of May 1, 2025)

| | 1. Discounted Commercial Transactions | 2. Commercial Product Evaluations | 3. Customer Service/Customer Satisfaction (“Goodwill”) | 4. Warranty & Extended Service Agreements | 5. Product Development (Data and/or feedback) | 6. Marketing Data and / or feedback | 7. Research Contests | 8. Research Grants (Investigator initiated Research) | 9. Joint Research (“Research Collaborations”) | 10. Illumina Initiated Research (“Company Research”) | 11. Charitable Donations | 12. Business Development Deals (“Commercial Collaborations”) | 13. Educational Grants | 14. Any other requests (not covered in the framework). |
|--------------------------|--|--|--|--|---|---|--|---|---|--|---|---|---|--|
| What is Provided? | A reduction in price. No-charge product may be provided as part of a sale to reduce the overall price. | A reasonably limited number of no-charge consumables or a reasonably short-term no-charge loan of an instrument, server, etc. If the evaluation period exceeds 90 days, the transfer of value beyond that period must be tracked and reported. | No-charge product | No-charge product | In-development product and/or no-charge product related to in-development product | No-charge product | No-charge product | Funding or no-charge product | Funding or no-charge product | Funding or no-charge product | Funding or no-charge product | No-charge product | Funding or no-charge product | No-charge product |
| Purpose | To facilitate a sale. | To allow the recipient to evaluate an Illumina product in order to make an informed purchasing decision. The Recipient MAY NOT profit from the results obtained through the evaluation (e.g., through billing of a health insurance program such as Medicare, NHS, ...) | To resolve or address customer issues or less than satisfactory customer experiences not covered under a warranty or service contract. | To support Illumina products under warranty or service contract. | To support the development of Illumina products as part of the Product Development Process. | Post-market third-party evaluation of product | To support marketing of Illumina products in the form of a contest that researchers enter by submitting research proposals. | To support independent third-party research aligned with Illumina’s research priorities and objectives. | To support research conducted jointly with third parties. Both the researcher and Illumina have a legitimate need for the evidence generated and bring distinct expertise to the project. | To support research conducted on behalf of Illumina. | To support philanthropic or charitable activities. | To support commercial partnerships with third parties to jointly develop new products, new product uses, new commercial opportunities, etc. | To support third-party advancement of genuine scientific or medical education that is aligned with Illumina’s medical education priorities and objectives. | Various purposes that do not fit into any of the existing ‘no-charge product framework’ categories |
| Recipients | Illumina Customers | Existing Illumina Customers Potential Illumina Customers | Illumina Customers | Illumina Customers | Illumina Customers Contractors Consultants Vendors | Illumina Customers | Individual Researchers (non-HCPs) | Individual Researchers Research Organizations Illumina Customers | Individual Researchers Research Organizations | Contractors Consultants Vendors | Charitable Organizations Non-Profit Organizations with Charitable Purposes | Business Partners | Conference Organizers Illumina Customers Medical and Scientific Societies or Organizations Institutes of Higher Learning Research or Laboratory Organizations | Various |
| Examples | A 50% discount structured as a “buy one get one free” transaction. Providing a limited number of no-charge consumables in connection with the purchase of an instrument. Providing a “free” service contract as part of the purchase of an instrument. | Providing a newly released consumable to a potential customer to help them make a purchasing decision. Providing a consumable to an existing customer who would like to evaluate it for a new use. Providing a license and access to Illumina software for a limited time to help a customer make a purchasing decision. | Short term loan of an instrument provided to a customer to address delayed delivery of purchased product (“Sales Loaner”). Providing a low value component to a customer who has inadvertently lost, spilled, or improperly stored the item. | Loaning a service instrument to a customer while repairs are made to their existing down instrument. | Providing product to a third party, working on behalf of Illumina, to enable them to test and provide feedback or data which will be used to further develop an Illumina product. | Providing commercially available product to a customer to obtain data and/or feedback needed by Illumina for Marketing purposes (e.g., data provided is used to create an App Note, or sharing customer data and / or feedback for promotional purposes etc.) | A free consumable provided to a research contest winner to enable them to perform the experiment proposed in their research contest entry. | Providing consumables to a cancer researcher to enable them to conduct independent research. | Providing consumables to a cancer researcher to enable them to conduct research that has elements developed by the researcher and by Illumina. | Providing consumables to a research consultant, working on behalf of Illumina, in order to enable them to conduct clinical research. | Providing an instrument to a community college to support their genomics education program. | Co-development of technologies that work on Illumina platforms. Provision of Illumina technologies to accelerate development of promising technologies. | Providing consumables to a third-party to support their training program to train lab techs | Various exceptional situations. |
| SFDC Category | Discounted Commercial Transactions | Commercial Product Evaluation or Demo Instrument | Customer Service or Dispute Resolution | N/A | Product Development | Marketing Data | Research Contests | Research Grant: HCP Research Grant: Non-HCP: Human Health Related Research Grant: Non-HCP: Non-Human Health Related | Research Collaboration: HCP Research Collaboration: Non-HCP: Human Health Related Research Collaboration: Non-HCP: Non-Human Health Related | Illumina Initiated Research | Donations | Business Development | Educational Grants | Other: Legal Review Required |
| NCSO or NCMO | NCSO | NCSO | N/A | N/A | NCMO | NCMO | NCMO | NCMO | NCMO | NCMO | NCMO | NCMO | NCMO | NCMO or NCSO dependent on situation |

| | 1. Discounted Commercial Transactions | 2. Commercial Product Evaluations | 3. Customer Service/Customer Satisfaction ("Goodwill") | 4. Warranty & Extended Service Agreements | 5. Product Development (Data and/or feedback) | 6. Marketing Data and / or feedback | 7. Research Contests | 8. Research Grants (Investigator initiated Research) | 9. Joint Research ("Research Collaborations") | 10. Illumina Initiated Research ("Company Research") | 11. Charitable Donations | 12. Business Development Deals ("Commercial Collaborations") | 13. Educational Grants | 14. Any other requests (not covered in the framework). |
|-------------------------------|---|--|--|---|--|---|---|---|---|---|---|---|--|--|
| Process Owner | Commercial | Commercial | Customer Service: Service and Support/Tech Support Dispute Resolution: Legal | Commercial Operations | Research & Development (R&D may partner with Marketing and/or Medical as needed) | Marketing | Marketing | Medical Organization (HCP and/or Human Health Related) Marketing (Non-HCP and Non-Human Health Related) | Medical Organization (HCP and/or Human Health Related) Marketing (Non-HCP and Non-Human Health Related) | Medical Organization Marketing Research & Development | Corporate Social Responsibility (CSR) | Business Development Marketing | Medical Organization (HCP and/or Human Health Related) Marketing (Non-HCP and Non-Human Health Related) | Legal |
| Reviewers / Approver | Commercial Pricing Approval | Commercial Approval Process Compliance if evaluation period is over 90 days. Commercial must provide transparency reporting data. | Customer Service: Service and Support/Tech Support Dispute Resolution: Legal | Commercial Operations | Research & Development | Marketing | Marketing Compliance Legal | Medical Research Review Committee (HCP and/or Human Health Related) Marketing (Non-HCP and Non-Human Health Related) | Medical Research Review Committee (HCP and/or Human Health Related) Marketing (Non-HCP and Non-Human Health Related) | Medical Organization Marketing Research & Development | Corporate Social Responsibility CSR Steering Committee Board | Business Development Marketing Legal | Medical Education Review Committee (HCP and/or Human Health Related) Marketing (Non-HCP and Non-Human Health Related) | - Approvers: General Counsel and VP (or higher) - Compliance and Legal to be notified |
| Agreement Required (?) | Terms and Conditions Quote Sales Agreement Invoice | Consumables: No formal agreement is required, but notification must be provided to the customer. This can be done in a PPM, terms & conditions, on an invoice, etc. Instruments/Hardware/Software: Product Evaluation Agreement | Low Value Components: No formal agreement is required, but the reason for providing the no-charge product must be documented. Sales Loaners: Loaner Agreement Dispute Resolution: Commercial Settlement Agreement | Service Contract Warranty | Product Development Collaboration Agreement; Beta Test Agreement; Early Access Agreement (Pre-Release); Master Service Agreement | Data Sharing Agreement (with written protocol or questionnaire forming part of the agreement) | Terms and Conditions; Contest Agreement | Grant Agreement | Research Collaboration Agreement | Clinical Trial Agreement; Investigator Agreement; Master Service Agreement (as appropriate) | Donation Agreement; Grant Agreement | Commercial Collaboration Agreement; Co-Marketing Agreement; Material Transfer Agreement | Grant Agreement | Various, dependent on situation |

Illumina No Charge Product Framework | Version:2.0 | Date of Preparation: May 2025 | Corporate Compliance | Please refer to the full Illumina 'No-charge Product Framework' (available on the Corporate Compliance Insider page) for further information: [Link](#) The guidance may be subject to periodic updates. Individuals downloading a copy of this document are responsible for ensuring that revisions to the document have not been issued since it was downloaded. If you require any further information, please contact your Regional Compliance Officer or alternatively email Compliance: compliance@illumina.com

Integrity Code Appendix 3

Advisory Board Checklist

This checklist is a planning document to help you ensure that Advisory Boards are convened in accordance with all applicable anti-bribery and anti-kickback laws. The Illumina team holding the Advisory Board should ensure that this Checklist is followed and maintain written documentation of all the information referenced in this Checklist. This information may be requested as part of Corporate Compliance's Monitoring and Auditing Program.

Advisory Board Definition: A meeting convened to obtain a third-party expert's feedback, insights, or guidance on a product need, disease state, or scientific or business discipline.

General Guidance

- Advisory boards should only be held to enable Illumina to answer legitimate business questions for which we do not know or have the in-house expertise to answer.
- The number of Advisory Board meetings on a particular topic should be limited to no more than the number required to achieve the stated objectives. Multiple Advisory Boards on the same topic should be avoided unless a legitimate need can be demonstrated.
- Prior to convening an Advisory Board, comprehensively document the expected outcomes of the meeting and how the outputs will be used at Illumina and for what purpose.
- Prior to convening and Advisory Board confirm whether an Advisory Board on the same topic(s) has already taken place within the prior 12 months. If so, clearly document the justification for why another meeting is necessary. If you are not able to provide this justification, the Advisory Board should not be convened.
- Advisory Board meetings should not be promotional in content or design.
- All Advisory Board documentation and materials should be retained for seven years.

Agenda

- Document the legitimate business need and purpose/objective for this Advisory Board.
- Identify each external advisor and internal participant.
- Document the agenda, including specific questions to be answered by the external Advisory Board participants.

Venue

- Meetings should occur at an Illumina facility or at a venue in a business-appropriate, central location given the place of residence of the majority of participant advisors.
- All venues for Advisory Board meetings must be conducive to the effective exchange of information and must not be luxury, tourist, or entertainment oriented.

Meeting Minutes

- Meeting minutes should be documented and reflect that a significant majority of the meeting time (70% or more) was spent obtaining feedback and expert advice through substantive discussions with the participants.
- The meeting minutes should reflect all external participant advisors and all internal participants and attendees.
- The meeting minutes should reflect active⁷ participation and meaningful contributions by all Advisory Board participants.

External Participants Advisors

- The need to engage HCP or Government Official advisors for an Advisory Board must have been identified in the most recent annual Needs Assessment (i.e., one of the requirements of Illumina's ***Engagement of Healthcare Professionals and Government Officials and Fair Market Value Policy***).
- Each participant advisor should be selected according to their expertise such that they will be able to contribute meaningfully to the purpose and expected outcomes of the meeting.
- The justification for each external participant advisor should be documented.
- The number of participant advisors at each Advisory Board should be limited to no more than the number required as to allow active participation and unique contribution by all. A ratio of at least three external advisors to every internal participant (3:1 ratio) is advisable, unless you document a legitimate need for a lower ratio. At a minimum, Illumina attendees should not outnumber the expert advisors.
- Before engaging a participant advisor, you should confirm that they are permitted to participate (e.g., that they have their employer's consent). Also, some countries require specific checks (e.g., US debarment checks for US physicians, etc.).

Internal Participants

- Advisory Boards are non-promotional activities where experts will be engaged on a fee-for-service basis to address legitimate unanswered business questions. Illumina Sales personnel's participation or attendance is generally inappropriate, unless a legitimate need in furtherance of the documented purpose of the Advisory Board can be demonstrated (i.e., Illumina Sales personnel should not attend unless their participation is necessary for Illumina to obtain the information and advice being sought from the external participants and no one else from outside the Sales organization can perform this role).
- The role of each internal participant should be documented.
- Observation alone is generally not an appropriate justification for attendance, as meeting minutes and summary reports can be shared with relevant cross-functional teams after the meeting.

Written Agreements

- A written contract or agreement is required for each external participant advisor in advance of the commencement of the services, which specifies the nature of the services to be provided and the basis for payment of those services. The agreements need to comply with Illumina's ***Integrity Code*** and ***Engagement of Healthcare Professionals and Government Officials and Fair Market Value Policy***.
- All preparatory and follow-up work, if any, that will be required of the experts attending the Advisory Board should be documented in the agreement (e.g., required pre-reads; expert presentations, etc.).

Expert Compensation

- All compensation from external advisors must be at fair market value and comply with Illumina's ***Engagement of Healthcare Professionals and Government Officials and Fair Market Value Policy***.

Other Transfers of Value (Meal, Travel, Accommodations, and Gifts)

- Any meals, travel, accommodations, or other Transfers of Value provided or reimbursed to external participant advisors must comply with Illumina's ***Integrity Code*** and ***Regional Addenda***.