

**Policy Title: Interactions with Healthcare Professionals and Organizations Policy**

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## References

Policy Title	Policy Number
Anti-Bribery and Anti-Corruption Policy	CP 500.05
Global Travel and Expense Reimbursement Policy	CP 200.14
Grants Policy	CP 500.14
Corporate Donations Policy	CP 900.01

### 1. Purpose and Background

As a company that manufactures and sells products and services for medical use, Illumina is subject to laws, regulations and rigorous standards of conduct governing its interactions with healthcare professionals and healthcare organizations. 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 anti-bribery and other 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. FDA, 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 Policy establishes standards on how we at Illumina must conduct business with healthcare professionals and healthcare organizations in support of our business objectives while simultaneously ensuring our compliance with applicable laws, regulations, and standards of conduct.

This Policy also adheres to the principles found in various national and international industry codes of conduct including those of the Advanced Medical Technology Association (AdvaMed), MedTech Europe, and Canada's medical technology industry (MEDEC).

### 2. Scope: Who this Policy Applies to

This document applies to Illumina, Inc. and its subsidiaries and affiliates **globally** (collectively referred to as "**Illumina**"), including all of 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.

### 3. Who are Healthcare Professionals ("HCPs") and Healthcare Organizations ("HCOs")

#### 3.1. Healthcare Professional or "HCP"

An HCP is anyone that is:

- 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
- Involved in the decision to purchase, prescribe, order, use or recommend medical devices, technologies or related services.”

For purposes of this document, any employee or temporary worker through an employment agency hired by Illumina is not considered an HCP. Except for purposes of tracking and disclosure of transfers of value or other benefits provided to HCPs and HCOs, any person that is a Member of the Board of Directors of Illumina, Inc., is not considered an HCP.

### 3.2. Healthcare Organization or “HCO”

Any legal entity or body that is a healthcare, medical, or scientific association or organization which may have an influence on the decision to use, purchase, prescribe, order, or recommend medical technologies or related services; or through which one or more HCPs provide services.

Examples include, but are not limited to, hospitals, group purchasing organizations, clinics, laboratories, research institutions, foundations, universities or teaching institutions, and professional societies.

## 4. Principles to Follow when Interacting with HCPs and HCOs

- Respect and support the healthcare provider-patient relationship and their responsibility to use independent judgment.
- Respect our customers and the policies of their institution or organization.
- Do not use concepts or practices that result in “buying business.” Do not provide improper inducements to anyone in order for them to use, order, or recommend the use or ordering of Illumina’ products or services, and do not engage with anyone seeking improper inducements, including HCPs or HCO personnel, **even if it is claimed, culturally assumed, or perceived to be, common business practice in the jurisdiction.**
- All venues and locations for interactions with HCPs must be conducive to the effective exchange of information.
- All remuneration to HCPs and HCOs must represent fair market value and be commensurate to the services the HCP/HCO provides to Illumina. Remuneration comes in many different forms, including, for example, cash payments and providing free of charge product or services.
- Interactions with HCPs that are also employees of government owned, funded or controlled institutions or entities are also government by Illumina’s ***Anti-Bribery and Anti-Corruption Policy (CP 500.05)***. In all cases, the more stringent of the two Corporate Policies (CP 500.05 and CP 500.06) shall apply.
- If you have any doubt in any situation, contact your supervisor or send questions to [compliance@illumina.com](mailto:compliance@illumina.com).

## 5. Gifts May Not be Provided to HCPs

**Gifts and giveaways (including tradeshow giveaways) may not be provided to HCPs.** A gift is anything of value provided to an HCP without the expectation of receiving anything in return, including but not

limited to non-educational and branded items used in an office setting such as pens, mugs, backpacks, phone cases, notepads; candy, wine, gourmet baskets and other gifts of food or drink; tickets to sporting or entertainment events; gifts for recognition of life events or holidays; and gifts of cash or cash equivalents such as gift cards and charitable contributions.

**Contest prizes, raffle prizes, etc. are considered gifts and may not be provided.**

Educational materials of modest value such as medical textbooks and journal reprints may be provided to HCPs.

***Gifts may not be provided to HCPs by Illumina employees, even if personal funds are used.***

## **6. Entertainment and Recreational Activities May Not be Provided to HCPs**

Providing, or paying for, an HCP or their staff's entertainment or recreation such as sporting events, theater, golf, concerts or going out for drinks, or facilitating the purchase of tickets or getting to the events, is not allowed. Entertainment and recreation is prohibited as it could be seen as an improper inducement to purchase products or services.<sup>1</sup>

## **7. Meals Provided or Reimbursed for HCPs; Meal Spend Limits**

### **7.1. When meals allowed**

Where allowed by law and the HCP's institution's policy, a meal or refreshments may be provided or paid for, if all of the following conditions are met:

- Must be associated with a legitimate business purpose (e.g., presentation or discussion of scientific, technical, or educational information, including in connection with Illumina products and services).
- Must be subordinate in time to the business purpose of the meeting/engagement.
- Must not simply be for "goodwill."
- Should not occur on a frequent basis.
- Should be modest in value, taking into consideration the geographic area.
- Should be provided at a venue appropriate for conducting business on behalf of Illumina.
- Meals on-site at an HCP's facility are generally allowed. However, it is not appropriate to bring food to an HCP's facility and leave without participating in a relevant exchange of information and engaging effectively with the HCP.
- No meals or refreshments may be provided to spouses or guests of the HCP.

### **7.2. Meal Spend Limits**

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<sup>1</sup> Customary business meals permitted by this policy are not considered entertainment

The limits below are to be treated as maximums that should not be exceeded and expense averages should commonly fall beneath the maximum. The limits below are in U.S. Dollars and apply to all HCPs practicing in the United States.

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

- Breakfast/snack/lunch in the HCP's Office: USD 30/person.
- Dinner in the HCP's Office: USD 60/person.
- Breakfast/Lunch outside of the HCP's Office: USD 80/person.
- Dinner outside of the HCP's Office: USD 135/person.

For HCPs practicing outside of the United States, you should comply with any applicable meal spend limits or guidelines published on the **"Regional Guidance" section of the Corporate Compliance Insider Page**. If no limits or guidelines are published for a particular country outside of the United States, you may determine the appropriate meal limits by using the limits above taking into consideration the current exchange rate and the relative cost of living.

Illumina personnel are reminded to follow Illumina's ***Travel and Expense Policy (CP 200.14)*** for their meals irrespective of the above meal spend limits for HCPs.

***You must follow all requirements imposed by other jurisdictions or institutions, for example:***

- U.S. State of Vermont:
  - No meals may be provided to HCPs (including HCP staff).
- Government employed HCPs in the U.S.:
  - In the U.S. no meals may be provided to HCPs that are government employees (e.g., HCPs that have privileges at a Veterans hospital).
- Many HCPs outside the U.S. are government employees:
  - Check with Illumina's other policies and guidelines concerning anti-bribery and corruption as well as local law and the institution's policies before providing them a meal.
- If in doubt whether it is appropriate to provide an HCP or their staff a meal, do not do it.

## **8. Travel Provided to or Reimbursed for HCP**

- Illumina may provide, pay for, or reimburse, the ordinary, reasonable, and necessary travel expenses of HCPs provided that the travel supports a legitimate business need of Illumina.
- Travel may not be provided as a gift or reward for business or for purpose of entertainment.
- Specifically,
  - **Airfare:**
    - 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 never permitted without approval from Illumina's Chief Compliance Officer.
- **Ground Transportation:** All ground transportation must be reasonable and not lavish. Train travel may be business class (or first class provided there is no designated business class option).
- **Lodging/Hotels Accommodations:** All lodging must be considered reasonable and not lavish. Luxury, vacation or resort venues are inappropriate in most circumstances and may not be paid for, provided or reimbursed without consulting Compliance. Incidental expenses may not be reimbursed. Lodging must be directly related to the legitimate business purpose in time and proximity. For example:
  - Illumina may only provide or reimburse hotel accommodations for the duration of the business event. If the HCP will be traveling long distance, 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.
  - Illumina should only provide or reimburse accommodations within close proximity and easily accessible to the business event.
- **Meals:** refer to Section 7 of this Policy ("Meals Provided or Reimbursed for HCPs; Meal Spend Limits").
- Travel expenses of companions/guests of the HCP may not be provided or reimbursed.
- HCPs that are government employees may not be able accept travel that is paid for or reimbursed by Illumina. In those cases, consult with the HCP's institution in advance in order to verify it is acceptable.

## 9. Venues for Illumina Organized Business Meetings, Trainings and Educational Events involving HCPs

- The location for the meeting, training or educational event must be conducive to an effective exchange of information and, reasonably located to the HCP's place of business or at an Illumina facility.
- Reasonable meals and refreshments consistent with this Policy (see Section 7 "Meals Provided or Reimbursed for HCPs; Meal Spend Limits") may be included, but must be subordinate in time.
- Reasonable travel and accommodations for the HCP may be provided consistent with Section 8 of this Policy ("Travel Provided to or Reimbursed for HCP") when necessary for the purposes of the meeting.

## 10. Consulting, Speaking, Advisory and Other Services Provided by HCPs

All consulting or other arrangements with HCPs must address legitimate business needs of Illumina and involve only appropriately selected HCPs who are paid fair market value for services they provide Illumina.

### 10.1. Typical Reasons for HCP Engagement

There are many reasons for Illumina to collaborate with HCPs, including for example:

- Product development and research.
- Advisory board membership (e.g., helping us understand markets better).
- Clinical (e.g. clinical studies: protocol development, investigators, trial monitors).
- Medical education.

- Medical training (e.g., instructing other HCPs on how to use our products). These engagements should be managed by Illumina's Medical Affairs department. Please send inquiries to [medicalaffairs@illumina.com](mailto:medicalaffairs@illumina.com).

### 10.2. Use Needs Assessment and Objective Criteria to Select HCPs

- Consultants should be chosen based on a needs assessment including the goals of the project or event, medical specialty, credentials, years of experience, etc.
- HCPs should be chosen solely on the basis of their qualifications and expertise that enable them to fulfill the legitimate business needs of Illumina.
- The desire to get potential consultant HCPs or related HCOs to use Illumina products is not a valid criterion for selection.
- Rewarding HCPs or related HCOs who purchase a significant volume of Illumina products is not a valid criterion. However, choosing an HCP who has performed a specific number of procedures using a device may be relevant as it demonstrates the HCP's experience.
- Sales representatives should not control or unduly influence the decision to hire the HCP consultant.
- Avoid conflicts of interest, actual and potential.
- Verify background of potential HCPs, including ensuring they have not been debarred or excluded by any government agency. Websites to conduct searches include:
  - OIG excluded party list: go to <https://oig.hhs.gov/exclusions/index.asp> and go to "Online Searchable Database" and perform a search on the HCPs name.
  - GAO government contracting excluded party list: go to [www.sam.gov](http://www.sam.gov) and go to "Search Records" and perform a search on the HCP's name.
  - FDA debarred list: go to <http://www.fda.gov/ICECI/EnforcementActions/FDADebarmentList/default.htm> and perform a search for the HCP.
- Document in writing how you chose the HCP, including copies of CVs, leadership in professional organizations, as well as reviewing relevant awards & recognitions.

### 10.3. Payments/Fees to HCPs for Services

When Illumina pays a fee for a service provided by an HCP, we are paying for the acquisition and application of the HCP's particular expertise, the time spent providing that expertise, and any work-product requested. Taken together the expertise, the time involved, and any work product represent the 'service.' All fees paid to HCPs must reflect the fair market value for the services provided.

- All fees for services paid to an HCP or HCO must comply with Illumina's **Fair Market Value Guidelines**, which can be located on the "**Fair Market Value**" section of Illumina's **Corporate Compliance Insider Page**.
- Fees may not be tied in any way to the value or volume of Illumina's products that may be used, purchased or generated by the HCPs or a related HCO.

### 10.4. Donations to Charity in Lieu of Payment to an HCP or HCO

A donation may be made to a charity or non-profit organization of Illumina's choosing in the event an HCP or HCO elects not to receive compensation for services they render to Illumina, provided that the following requirements are met:

- The donation in lieu of payment is permissible under all applicable local laws and industry codes (for example, donations in lieu of payments to HCPs are prohibited in all countries within the MedTech Europe Geographic Area);
- The donation is made to a charitable organization designated by Illumina's Corporate Social Responsibility organization;
- The amount of the donation is equal to the fair market value of the services provided and complies with Illumina's **Fair Market Value Guidelines**, which can be located on the "**Fair Market Value**" section of Illumina's Corporate Compliance Insider Page; and
- The proper local tax and accounting provisions are taken into consideration in consultation with the local tax/accounting group.

#### 10.5. Written Agreement with the HCP

- All engagements require a formal, written agreement that should be in place prior to work commencing.
- Agreements should be properly reviewed by Illumina's legal department and signed by an authorized representative of Illumina in accordance with Illumina's **Signature of Authority Policy (CP 200.02)**.
- Agreements should include details about the goals of the engagement, the services and/or deliverables to be provided to Illumina and any fair market value payments to be made to the HCP by Illumina.
- Ensure the fully executed copy of the agreement is stored in the contract repository along with back-up documentation establishing how the HCP was chosen.

#### 10.6. Ongoing Contract Administration

- Ensure that the services are performed, and deliverables received as required by the agreement.
- Ensure that HCPs provide documentation to support that the services were performed as required. The documentation should be appropriate to the type of work performed, such as:
  - Case report forms.
  - Written activity reports.
  - Tangible work product (e.g., presentation slides, memos, papers).
  - Course evaluations by attendees at trainings put on by the HCP.
  - Receipts for reimbursable expenses.
- Documentation needs to be completed by the HCP in close proximity to the time of service.

#### 10.7. HCP Speakers and Presentations

HCPs may only be engaged to present or promote Illumina's products and services when allowed by applicable law. For example, HCPs in China are prohibited by law from participating in any promotional activities.



When Illumina has an HCP promote, or give presentations concerning the HCP's use of Illumina's products or services, whether the HCP is paid or not, Illumina is responsible for the material the HCP communicates and the content of any presentations and should ensure the HCP appropriately promotes our products.

HCPs may be engaged to promote, discuss, or give presentations concerning Illumina's products and services if all of the following are met:

- A written agreement has been executed.
- The nature of the speaker's relationship and engagement with Illumina must be disclosed to the audience.
- Any materials or presentations used comply with Illumina Advertising and Promotional Material Guidelines and Review Process. See Section 16 ("Promotional and Other Targeted Materials Directed at Healthcare Professionals") of this Policy.
- The presentation, if concerning an *in vitro* diagnostic product, must contain a fair balance of the risks and benefits of the device and all data and claims should be based on approved instructions for use or other official labeling. *In vitro* diagnostic products are those that are cleared or approved by the FDA or have the equivalent regulatory approval in other countries.
- The presentation must not be false or misleading in any way.
- The speaker is trained by Illumina personnel on the requirements of this Section 10.7 and the engagement must comply with all other provisions of this Section 10.
- The speaker, if the presentation concerns an *in vitro* diagnostic product, should answer questions about off-label uses of the product using the following:
  - Speakers may answer the question asked by providing factual (and scientific where possible) information or information about their personal experiences but may not make claims about the off-label use. Refer to Section 16 ("Promotional and Other Targeted Materials Directed at Healthcare Professionals") concerning off-label use.
  - Speakers should make clear that the use discussed is unapproved and may provide only that information necessary to answer the particular question.
  - After answering the question, speakers should return to the on-label discussion.
  - Extensive questions about off-label uses or questions that the speaker cannot answer should be referred to Illumina's Medical Affairs department at [medicalaffairs@illumina.com](mailto:medicalaffairs@illumina.com).

#### 11. Other Payments to HCPs and HCOs

Other payments, transfers of value, or provision of other benefits to HCPs or HCOs not specifically addressed in this document may be permissible if (1) they serve a legitimate business purpose of Illumina, (2) the compensation provided represents fair market value for the service, item, or value being provided back to Illumina, and (3) the payment is not an inducement or reward for the purchase, use, or recommendation of Illumina products or services. Such arrangements are to be documented in writing.

Some examples include:

- Royalty payments to an HCP or HCO for the license of intellectual property.

- Rental fee or space usages fees paid to an HCP or HCO such as renting lab space or renting an auditorium for a training meeting.
- Payments or provision of services or products to HCOs for their performance of non-clinical research activities such as research services, and collaborations to develop new products.

## 12. California Aggregate HCP Spend Limit (Cal. Health & Safety Code §§ 119400-119402)

In addition to all other requirements of this document, the aggregate value of all promotional materials, items or activities provided for each of the following California HCPs may not exceed USD 2,500 per year 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 spend limit does not apply to any of the following that are provided to such California HCP if they are otherwise provided in compliance with this document: Evaluation and demonstration products, financial support for continuing medical education, financial support for health education scholarships/sponsorships, payments made for legitimate services provided to Illumina by the California HCP.

## 13. No-Charge Product: Evaluation, Demonstration products, and discounts provided to HCPs and HCOs

- All no-charge product given to HCPs and HCOs should be consistent with Illumina's **No-Charge Product Framework**, which can be found on the **"No-Charge Product Framework" section of the Corporate Compliance Insider Page**.
- Instruments, equipment, and software products may be placed with an HCP or HCO free of charge for evaluation or demonstration purposes, provided that the product is provided only for the reasonable time period necessary for the HCP to adequately evaluate the product and determine if it is fit for purpose (generally for a few months). Such placements should be infrequent and may not be provided as a reward for past or future business.
- Modest quantities of consumable products may be provided to HCPs and HCOs free of charge for evaluation or demonstration purposes, provided that the quantity of consumable provided is limited to that necessary for the HCP to adequately evaluate the product and determine if it is fit for purpose. Such evaluation samples should be infrequent and may not be provided as a reward for past or future business.
- All evaluations and other free of charge products must have any required internal approvals.
- Customary discounts for the purchase of products is acceptable; provided that, the discount results in a competitive price and all applicable internal approvals have been obtained.

## 14. Educational Grants (CME), Research Grants and Charitable Donations

### 14.1. Third party educational conferences (CME and other Professional Education)

Continuing Medical Education and other Professional Education sponsored by Illumina is managed by Illumina's Medical Affairs department. All educational grants must comply with Illumina's **Grants Policy (CP 500.14)** and be approved by Illumina's Medical Education Review Committee.

**14.2. Grants for investigator-initiated medical research**

Grants for investigator-initiated medical research is managed by Illumina's Medical Affairs Department. All research grants provided to HCPs or HCOs must comply with Illumina's **Grants Policy (CP 500.14)** and be approved by Illumina's Research Review Committee.

**14.3. Donations for patient focused charitable or educational programs**

- Must be a bona fide charity or non-profit entity.
- The contribution/donation should be documented in a written agreement.
- All charitable donations must comply with Illumina's **Corporate Donations Policy (CP 900.01)** and be approved by Corporate Social Responsibility.

**15. Sunshine Act and Transparency Reporting (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 ("TOVs" made to certain HCPs and HCOs ("Covered HCPs/HCOs") in order to comply with all applicable global transparency laws (e.g., the United States Sunshine Act, France's Loi Bertrand<sup>2</sup> (Sunshine Act equivalent), Massachusetts, Vermont, Connecticut, and other U.S. State and international disclosure laws).

All personnel are required to report all TOVs provided to HCPs and HCOs in compliance with our Sunshine Act and Transparency Reporting requirements. For more information visit the "**Transparency Reporting**" section of the **Corporate Compliance Insider Page** or send questions to [sunshineact@illumina.com](mailto:sunshineact@illumina.com).

**Remember**

***For purposes of this Interactions with Healthcare Professionals and Organizations Policy, the scope of and type of people and institutions that are considered HCPs and HCOs is very broad, even though the types of HCPs and HCOs that we have to report TOVs for may be narrower.***

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 truthfully and accurately using the categorizations and processes established by Illumina. ***Transactions must never be misreported or disguised under any circumstances.***

**16. Promotional and Other Targeted Materials Directed at Healthcare Professionals**

This Policy concerns both promotional material and other targeted material directed at healthcare professionals (HCPs). "Promotional material" refers generally to promotional, advertising, marketing, and labeling materials and communications, regardless of format. "Other targeted material" refers to product-

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<sup>2</sup> Contracts entered into with French HCPs or HCOs must be sent [sunshineact@illumina.com](mailto:sunshineact@illumina.com) immediately after they are executed so that we may report them to the French Government within 15 calendar days.

agnostic materials and communications (regardless of format), such as scientific materials that are used to educate or raise awareness.

All promotional material and other targeted material directed at HCPs must comply with all applicable laws, regulations, and Illumina policies, procedures and guidelines.

- **Illumina’s Content Approval Process (CAP)**

- All promotional and other targeted material must comply with the CAP Guidelines found [here](#). The CAP Guidelines include detailed requirements, covering all aspects of such material (e.g., requirements based on product type, content type, etc.).
- Only use material approved through CAP.
- Even if a given communication does not require approval under the CAP Guidelines, the content of the communication must be consistent with CAP-approved material regarding the applicable product or subject, must be accurate, and must not be misleading.
- The laws and regulations applicable to marketing to HCPs – whether product specific or product agnostic – vary from country to country. Before preparing such a campaign in a particular country, consult the Legal Department to learn what types of marketing to HCPs is permitted in that country.

- **Research Use Only (RUO) Products**

- RUO refers to devices or products that are used to conduct non-clinical laboratory research or are in the laboratory phase of development.
- All promotional material for RUO products must be labeled: “For Research Use Only. Not for use in diagnostic procedures.” This labeling must be prominently placed.
- RUO products may not be marketed or promoted for clinical or diagnostic use.

- **In Vitro Diagnostic (IVD) Products**

- IVDs are those Illumina products that are cleared or approved for clinical diagnostic procedures and applications by the U.S. Food & Drug Administration (“FDA”) or have obtained the equivalent regulatory approval, clearance or registration in another country.
- All promotional material for IVD products (including all data and claims) must be consistent with the labeling approved or cleared by FDA (or its equivalent in another country), cannot be false or misleading, must reveal all material facts about the product, must present information about effectiveness in a balanced manner, and must contain a fair balance between information relating to the risks and benefits of the device.
- All promotional material for IVD products must be labeled: “For *In Vitro* Diagnostic Use.” This labeling must be prominently placed.
- **Off-label promotion of IVD products is not permitted.** Off-label promotion includes statements that promote an IVD product or device for uses other than those approved or cleared by FDA or an equivalent agency in another country.

- Solicitation of inquiries about off-label use of IVD products is not permitted.
- Unsolicited requests for off-label information should be directed to Medical Affairs. An HCP can submit such requests through Illumina's Medical Information and Resources website at <https://www.illumina.com/clinical/medical-information-resources.html>.
- **Laboratory Developed Tests (LDTs)**
  - LDTs are intended for clinical use and are designed, manufactured, and used within a single high complexity CLIA-certified laboratory.
  - The only LDTs that may be promoted are those used in an Illumina owned and operated laboratory under Illumina Laboratory Services.
  - Promotion of an LDT used in an Illumina lab must be consistent with the use developed and validated by the lab under the applicable laws, regulations, and standards.
- **Use of Information about Third Parties**
  - All information in promotional material and activities regarding third parties (including third party products and services or third party testimonials) must comply with the CAP Guidelines, must fairly represent the third party and/or its products or services, and must not include any content that could be deemed false, misleading or offensive.

#### **17. Reimbursement Information Provided to HCPs or HCOs**

Provide only billing, coding, and reimbursement information or the cleared, approved, and intended use of the product. Billing information may not be provided for RUO products.

Forward all customer questions concerning billing, coding, or reimbursement to Illumina's Medical Affairs department at [medicalaffairs@illumina.com](mailto:medicalaffairs@illumina.com).

#### **18. Other Considerations**

Our customers are faced with the challenge of protecting their patients and ensuring that only those with a legitimate purpose enter their facilities. Accordingly, Illumina personnel may be required to agree to site-specific compliance policies and procedures such as a customer's Vendor Code of Conduct, confidentiality agreements, and training programs. Please ensure you review such documents carefully and honor our customer's requests; however, any agreements must be reviewed by the Legal department and may only be signed by persons authorized to execute agreements on behalf of Illumina. Generally, this is limited to Vice Presidents or above.

#### **19. Reporting Potential Compliance Violations or Concerns**

Everyone is responsible for promptly reporting any violations of applicable law or regulations, our Code of Conduct, as well as of any company policies and procedures. You have several options to report potential violations:

- Speak with your supervisor or the Human Resources department.
  - Upon receiving such a report, such supervisors and HR representatives must immediately alert Illumina's Compliance department of any allegation of or suspected violation of law or regulation, Illumina's Code of Conduct or an Illumina Corporate Policy.

- You may submit concerns to the Compliance department via email at [compliance@illumina.com](mailto:compliance@illumina.com).
- You may also submit a concern via the third-party managed Compliance and Fraud Prevention Hotline
  - By phone at (800) 461-9330.
  - By Internet at the [Compliance and Fraud Prevention Hotline](#).

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

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

## **20. Who to Contact if You Have Questions on How to Interpret this Policy**

Send questions to: [compliance@illumina.com](mailto:compliance@illumina.com).