

## Policy Title: Anti-Bribery and Anti-Corruption Policy

<b>Policy Number:</b> CP500.05	<b>Version Number:</b> 06
<b>Functional Area:</b> Legal	<b>Effective Date:</b> May 28, 2025
<b>Policy Owner:</b> Lacey Daugherty	<b>Policy Interpreter(s):</b> AMR, AMEA, Europe, and Greater China Regional Compliance Officers

## Purpose

The purpose of this Policy is to advise Illumina personnel of their anti-bribery and anti-corruption obligations and to ensure compliance by Illumina personnel with anti-bribery and anti-corruption laws, including but not limited to the U.S. Foreign Corrupt Practices Act, the UK Bribery Act and other local anti-bribery and anti-corruption laws.

## Scope

This policy applies to Illumina, Inc. and its subsidiaries and affiliates globally (collectively referred to as “**Illumina**”). All Illumina personnel, including employees as well as all third parties working on behalf of Illumina, must comply with this Policy.

## Definitions

<b>Term</b>	<b>Definition</b>
<b>Bribe</b>	A bribe is “anything of value given in an attempt to influence a person’s actions or decisions in order to gain or retain business or an improper advantage.” Kickbacks are considered bribes.
<b>Business Courtesy</b>	A business courtesy is “anything of value provided in furtherance of legitimate business for which fair market value is not paid by the recipient.” Business courtesies can include, but are not limited to, travel, hotel accommodations, meals, hospitality, entertainment (including tickets or passes to entertainment or sporting events), recreation (e.g., golf or sailing), gifts, and prizes.
<b>Corruption</b>	Corruption is “the misuse of public office or power for private gain or the misuse of private power in relation to business.”
<b>Facilitation Payment</b>	A facilitation payment is “a small sum paid to a government official/employee to facilitate or expedite a routine, non-discretionary action of the government official/employee.” Examples include a small sum paid to expedite customs clearance, schedule a government inspection, or issue a work visa.
<b>Government Official</b>	A Government Official is “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

Term	Definition
	<p>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"> <li>• 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,</li> <li>• Elected or appointed government legislators and members of a government ministry,</li> <li>• Political party officers and candidates for public office,</li> <li>• Employees or individuals acting on behalf of a public international organization (e.g., IOC, World Health Organization, United Nations),</li> <li>• Member of the military, and</li> <li>• Members of a royal family.</li> </ul>
<b>Healthcare Professional</b>	<p>Healthcare Professional means “anyone that is:</p> <ul style="list-style-type: none"> <li>• Authorized or licensed to provide healthcare services to patients (e.g., physicians, nurses, pharmacists, etc.),</li> <li>• Involved in providing healthcare services to patients (e.g., laboratory personnel, allied health professionals such as genetic counselors, etc.),</li> <li>• Involved in using a medical device for human use, or</li> <li>• Involved in the decision to purchase, prescribe, order, use or recommend medical devices, technologies, or related services.”</li> </ul>
<b>Improper Advantage</b>	<p>An improper advantage is “an advantage that is illegal or to which a company is not clearly entitled.”</p> <p>For example, a company would obtain an improper advantage if a person with decision-making authority were to misuse their authority by doing any of the following <i>because</i> they had been offered or received a bribe from the company: authorize the purchase of products, award a contract, issue an operating permit, or provide a product registration approval.</p>
<b>Kickback</b>	<p>A kickback is “an illegal payment intended as compensation for preferential treatment or any other type of improper advantage received.”</p>
<b>Money Laundering</b>	<p>Money laundering is “any act or attempted act to conceal or disguise the true origin and ownership of illegally obtained proceeds so that they appear to have originated from legitimate</p>

Term	Definition
	sources thereby avoiding prosecution, conviction and confiscation of the illegal proceeds.”

## Related Policies

Policy or Document Title	Policy or Document Number
Providing and Receiving Business Courtesies, Gifts, and Honoraria Policy	CP 500.13
Integrity Code	CP 500.16

## Policy

### 1. Bribery and Corruption are Prohibited

Illumina does not engage in Bribery or Corruption in the course of its business. Illumina employees and all third parties acting on Illumina’s behalf, including but not limited to consultants, contractors, distributors, sales agents and other channel partners, marketing agencies, meeting/event planners, and import/export companies, are prohibited from:

- offering, promising, authorizing, or providing anything of value to any customer, business partner, vendor or other third party 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 Improper Advantage, or
- providing anything of value to anyone in order to induce to them to use, purchase, prescribe, or recommend the use, purchase, or prescription of Illumina’ products or services.

Bribery is prohibited when dealing with any third party whether they are in the public or private sector and regardless of where they are located in the world. Illumina shall not use any third-party to make or receive a Bribe, directly or indirectly.

All requests or demands for Bribes must be reported to the Corporate Compliance Department as soon as possible.

### 2. Facilitation Payments are Prohibited

Facilitation Payments are illegal in most countries and Illumina employees and all third parties acting on Illumina’s behalf, including but not limited to consultants, contractors, distributors, sales agents and other channel partners, marketing agencies, meeting/event planners, and import/export companies, are prohibited from making facilitation payments. Report all requests or demands for Facilitation Payments to the Corporate Compliance Department as soon as possible.

If you are ever required to make a payment as a result of an imminent threat to your health, safety or welfare, the demanded payment may be made. However, you must immediately report the payment, including the amount and the circumstances under which it was made, to

the Corporate Compliance Department. Illumina will ensure such payments are accurately recorded in Illumina's books and records.

### **3. Providing Business Courtesies to Third Parties**

All Business Courtesies provided to third parties must be comply with Illumina's *Providing and Receiving Business Courtesies, Gifts, and Honoraria Policy* (CP 500.13). The totality of circumstances must be considered to avoid even the appearance that a Business Courtesy might be considered a Bribe.

### **4. Interactions with Government Officials and Healthcare Professionals**

All interactions with Government Officials and Healthcare Professionals, including but not limited to payments for services and other transfers of value, must comply with Illumina's *Integrity Code* (CP 500.16). The *Integrity Code* establishes specific rules and standards on how we at Illumina must conduct business with Government Officials and Healthcare Professionals around the globe in support of our business objectives while simultaneously ensuring our compliance with applicable anti-bribery and anti-corruption laws, regulations, and standards of conduct.

### **5. Political Contributions**

No Illumina funds, products, or services of any kind may be given to any candidate or prospective candidate for public office, to any political party, or to any other political initiative or campaign without the prior approval of the Government Affairs department.

### **6. Employment and Internships**

Illumina may not provide a job or internship to a Government Official, or a member of their family, in order to gain influence or curry favor with the Government Official. If a Government Official offers to give a benefit to Illumina or threatens to take adverse action in connection with a hiring decision, the suggested candidate cannot be hired.

### **7. Anti-Money Laundering**

Illumina is committed to complying fully with all applicable Anti-Money Laundering Laws, which prohibit market manipulation, trade of illegal goods, corruption of public funds, funding of terrorist organizations, and tax evasion, as well as any actions that aim to conceal these activities.

### **8. Accurate Books and Records and Internal Controls**

It is Illumina's policy to keep books and records that accurately and fairly reflect Illumina's transactions in reasonable detail and to maintain internal controls to prevent and detect potential violations of Illumina policies or of applicable law. No false, artificial, or misleading entries may be made in the books and records for any reason, and all payments and transactions, regardless of value, must be recorded accurately.

## 9. Compliance with this Policy

Failure to follow this Policy may result in disciplinary action, up to and including termination of employment in accordance with Illumina's Disciplinary Guidelines.<sup>1</sup> Any Illumina representative or agent who violates this Policy or who misleads investigators making inquiries into potential violations of this Policy, may have their contracts re-evaluated or terminated.

## 10. Reporting Potential 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](mailto: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 anonymous 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.

## 11. Additional Resources

Send questions to: [compliance@illumina.com](mailto:compliance@illumina.com) or visit the Corporate Compliance Department Insider page.

## Release History

Version	Version Date	Policy Owner	Description of Change
00	1009872	John Christian	Initial Release in SAP
01	September 4, 2018	John Christian	Updates to add clarification around pre-review by the legal department; adding China and Korea specific information

<sup>1</sup> Illumina will not directly or indirectly pay any fine imposed on an Illumina employee as a result of a breach of this Policy or a violation of any anti-bribery laws.

Version	Version Date	Policy Owner	Description of Change
02	July 17, 2019	Lesa Hutnak	Initial Release into new Corporate Policy Website. No content change.
03	October 13, 2020	Lesa Hutnak	Administrative change to correct the link to the Compliance & Fraud Prevention Hotline tool and correct the phone number.
04	April 6, 2022	Lesa Hutnak	Added Jared Bevills, Mahrukh Bashir, and Angela Zhu as interpreters. Removed Lesa Hutnak as interpreter and left her as Owner.
05	April 21, 2023	Gwen Chapman	Update to align with Illumina's current Anti-Bribery Compliance Program policies and procedures and applicable law.
06	May 28, 2025	Lacey Daugherty	Update to Policy Owner and Policy Interpreters.