Illumina forbids bribery and corruption in the conduct of its business. It is Illumina’s policy to comply with all applicable anti-bribery and anti-corruption laws, including but not limited to the U.S. Foreign Corrupt Practices Act, the U.K. Bribery Act, and the China Anti-Unfair Competition Law. As a manufacturer of medical devices and research tools, Illumina must be particularly sensitive to bribery and corruption issues when government officials/employees are involved, because governments are often both the regulators of Illumina products and our customers.

Illumina’s Anti-Bribery and Anti-Corruption Policy (“Policy”) prohibits Illumina employees and third parties working for or acting on behalf of Illumina from directly or indirectly, offering, promising, paying, giving, or authorizing the giving of any financial or other advantage, or anything of value, to any other person or organization, in order exert improper influence over the recipient, induce the recipient to violate his or her duties, secure an improper advantage for Illumina, or improperly reward the recipient for past conduct. The Policy also prohibits Illumina employees and third parties acting on Illumina’s behalf from requesting, agreeing to receive, or accepting a bribe, kickback, or any other improper financial or other advantage. Facilitation payments, regardless of whether permitted by local law, are prohibited by the Policy.

Business hospitalities (e.g., meals, travel accommodations, gifts, entertainment) may be provided to third parties, including government officials/employees, only if the hospitalities are:

• 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)
• Permitted by applicable local law
• Of reasonable value, taking into consideration the geographic area and business purpose (i.e., hospitalities must never be lavish or excessive)
• Subordinate in time to the business purpose of the meeting or engagement
• Allowed by the policies of the recipient’s company or institution

Illumina’s Policy also mandates that books and records accurately and fairly reflect Illumina’s transactions in reasonable detail and that internal controls are maintained to prevent and detect potential violations of the Policy or applicable law. No false 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.

Failure to follow the Policy may result in disciplinary action, up to and including termination. Violations of the Policy must be reported to Illumina’s Compliance department or via Illumina’s Compliance and Fraud Prevention Hotline.