Interactions with healthcare professionals and organizations policy statement

As a company that manufactures and sells products and services for medical use, Illumina is subject to rigorous standards of conduct regarding its interactions with healthcare professionals (“HCPs”) and healthcare organizations (“HCOs”), as well as additional laws and regulations. Illumina’s Interactions with Healthcare Professionals and Organizations Policy (“Policy”) establishes standards on how we at Illumina must conduct business with HCPs and HCOs in support of our business objectives while ensuring compliance with applicable laws, regulations, and standards of conduct. The Policy adheres to the principles found in various national and international industry codes of conduct including those of Advanced Medical Technology Association, European Diagnostic Manufacturers Association, MedTech Europe and Canada’s Medical Technology Companies.

In summary, the Policy requires that all Illumina employees and third parties acting on Illumina’s behalf adhere to the following principles when interacting with HCPs and HCOs:

• Respect and support the healthcare provider-patient relationship and an HCP’s responsibility to use independent judgment. Respect policies of customers’ institutions and organizations.
• Practices that result in “buying business” or that could be perceived as such are strictly prohibited.
• 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.
• Where allowed by law and the HCP’s institution’s policies, reasonably valued meals may be provided when 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).
• Reasonable and necessary HCP travel expenses may be paid for, provided that the travel supports a legitimate business need of Illumina.
• The provision of gifts and entertainment to HCPs is generally prohibited. Modest value promotional items may be provided where permitted by applicable law.
• Illumina tracks and reports payments or other transfers of value or benefits made to “covered” HCPs and HCOs as required to comply with transparency laws (e.g., the U.S. Sunshine Act, France’s Loi Bertrand, and other U.S. State and international disclosure laws).

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.