

California Comprehensive Compliance Program Declaration

Agendia is committed to empowering patients and their care teams with personalized, biology-based information. We are equally committed to conducting business with honesty, integrity, and in compliance with applicable laws, regulations, U.S. Office of Inspector General Compliance Program Guidance ("OIG Guidance") and the Advanced Medical Technology Association ("AdvaMed") Code of Ethics on Interactions with Healthcare Professionals and have developed a comprehensive compliance program to advance this commitment.

Compliance Leadership

Agendia has a designated Chief Compliance Officer (CCO) with responsibility and authority for developing, managing, and monitoring the Compliance Program. The CCO reports regularly on the status of the compliance program to the Chief Executive Officer (CEO) and the Supervisory Board. A Compliance Committee consisting of senior leaders from multiple business functions has been established to assist the CCO in implementing and managing the Program.

Written Standards

Agendia has implemented written standards of conduct, policies, and procedures which are periodically updated to provide guidance to the organization on the activities required for compliance with applicable laws, regulations and industry standards governing our business, including the OIG Guidance, the AdvaMed Code of Ethics. Employees are required to read and attest to these policies and to Agendia's Code of Conduct annually as well as any other policies that are relevant to their position.

Annual Spending Limits for California Healthcare Professionals

Agendia's compliance policies on healthcare provider interactions establish limits on items of value, including meals, for all healthcare professionals, that comply with Section 119402 of the California Health & Safety Code. These spending limits do not include fair market value payments to healthcare professionals for professional speaking or consulting or financial support for Continuing Medical Education (CME) programs.

Training and Education

Agendia provides training and education to all new and existing employees legal and ethical obligations that govern the Compliance Program, including the consequences of failing to comply with the program requirements. Education and training requirements are established based on employees' roles and responsibilities and are regularly reviewed and updated to encompass new topics and regulatory requirements, as needed.

Effective Lines of Communication

Agendia established and promotes multiple communication forums, including a third-party anonymous reporting hotline, for employees and business partners to bring compliance concerns forward. Each reported concern is promptly investigated and corrected when applicable. A zero-tolerance non-retaliation policy is enforced and regularly communicated to encourage reporting and questions without fear of negative consequences.

Monitoring and Auditing

Internal monitoring and auditing have been implemented to identify and prevent potential or actual non-compliance with the Program. Monitoring and audits are developed in accordance with existing and evolving risks identified as part of regular compliance risk assessments. Results of these activities drive continuous improvement and further education on the policies and procedures that support the Program.

Enforcing Standards

Enforcement and possible disciplinary consequences related to compliance violations are communicated to Agendia employees through Compliance policies, training, and education. When a compliance violation is confirmed, Compliance works with management and Human Resources to ensure fair, consistent, and progressive disciplinary actions are implemented.

Declaration Statement

Based on a good faith understanding of the requirements of Section 119402 of the California Health & Safety Code, Agendia declares that, to the best of its knowledge, as of August 1, 2026, it is in material compliance with its comprehensive compliance and ethics program and the requirements of the California Health & Safety Code §§ 119400-119402.