

Code of Conduct

AGENDIA®

Illuminating Your Path Forward

Message from the CEO

At Agendia, our work matters because patients depend on us.

Every day, healthcare professionals, patients, business partners, and one another place their trust in us. That trust is earned through the quality of our science, the integrity of our actions, and the way we treat people.

Our Code of Conduct serves as a guide to help us make decisions consistent with our mission, values, and commitment to ethical business practices. It outlines the expectations we share as members of the Agendia team and reinforces our responsibility to act with honesty, professionalism, and respect.

While this Code cannot address every situation we may encounter, it provides a framework for making sound decisions and knowing when to seek guidance. Each of us is responsible for understanding and following the principles described in this Code.

Our reputation has been built through years of dedication to patients, scientific excellence, and ethical conduct. Protecting that reputation requires every employee, every leader, and every representative of Agendia to do the right thing—even when it is difficult or when no one is watching.

Thank you for your commitment to living our values and strengthening our culture of integrity.

Mark R. Straley
CHIEF EXECUTIVE OFFICER



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Our Mission, Values and Expectations

Our Mission

Agendia improves the lives of cancer patients through innovative molecular diagnostics that help healthcare providers make informed treatment decisions. We pursue this mission through scientific excellence, quality, integrity, and compliance with applicable laws and regulations.

Our Values

INTEGRITY

We consciously and intentionally make decisions that reflect Agendia's commitment to ethical, honest and authentic answers for patients.

ACCESSIBILITY

We purposefully seek ways to break down barriers that impede communication and embracing alternate perspectives which may result in ground-breaking ideas.

CLARITY

We provide transparent actions and communication understanding that clear communication affects a patient's experience.

EXCELLENCE

We strive to go above and beyond in our work, knowing that our actions impact the life of a patient with breast cancer.

RESPONSIVENESS

We promptly respond to requests and issues in a calm and thoughtful manner, providing the timeliness needed for important decisions.

Expectations for Everyone

Every person who works for or represents Agendia is expected to:

- Act ethically and professionally
- Comply with laws, regulations, policies, and procedures
- Protect confidential, personal, and proprietary information
- Support patient safety, quality, and scientific integrity
- Maintain accurate records
- Use Company resources responsibly
- Raise concerns when issues arise
- Cooperate with compliance, audit, and investigation activities
- Treat others with dignity and respect.

How we achieve results is as important as the results themselves.











Making Ethical Decisions

Laws and regulations that impact our business can change and be difficult to understand and we might face a situation where the right thing to do is not obvious. That is where our Code of Conduct can help you exercise sound judgment and make the best choices for our company, our patients, our customers, and our personnel. Our competitive advantages are not only derived from our innovative products, but also from how we operate in the marketplace and the integrity of our actions. Our integrity inspires trust and strengthens our reputation for improving patients' lives through extraordinary achievements grounded in ethical behavior.

While this Code covers a wide range of business activities and expectations, it is not intended to cover every situation or replace good judgement. Instead, the Code sets out basic principles to help each of us feel more confident in making the right decision. When the answer is uncertain, ask yourself:

- Is it legal?
- Is it consistent with Agendia's values?
- Is it consistent w ith this Code and Company policies?
- Does it support patient interests and quality?
- Is the information accurate and truthful?
- Could it create a conflict of interest?
- Could it compromise privacy, security, or scientific integrity?
- Would I be comfortable discussing the decision with management, Compliance, or a regulator?
- Would I be comfortable if the decision became public?

If the answer to any question is "No" or "I'm not sure," stop and seek guidance from your manager, Compliance Team, Human Resources or any member of executive leadership. Seeking guidance reflects good judgment and helps prevent problems before they occur.

Business pressure, deadlines, financial objectives, or convenience never justify unethical conduct or noncompliance.



Responsibilities and Accountability

Compliance and ethics are everyone's responsibility. All company directors, officers and employees are required to read, understand, and agree to comply with the ethical standards described in this Code. Depending on the circumstances, a violation of applicable laws, our corporate policies or this Code by a company director, officer, or employee may lead to disciplinary action, including termination of employment or service with the company.

Employee Responsibilities

Employees are expected to:

- be familiar with and follow all laws, regulations, policies and procedures that apply to our jobs;
- conduct business according to the highest ethical and legal standards; and,
- report concerns and known or suspected misconduct immediately;
- cooperate and be truthful in any company investigation, audit, review, or inquiry.

Leader Responsibilities

Leaders are expected to:

- lead by example, holding ourselves to the highest standards of ethical business conduct;
- reinforce our Code through communications that emphasize the importance of ethics and compliance;
- create a positive work environment where everyone is comfortable raising questions and concerns;
- monitor employees' business conduct to ensure compliance with our Code; and,
- never retaliate or ignore acts of retaliation against others.



Respectful Workplace, Inclusion and Human Rights

Agendia is committed to a workplace where all individuals are treated with dignity, fairness, and respect. We value diverse perspectives and believe inclusion strengthens our organization and enhances patient outcomes.

Equal Opportunity

Employment decisions are based on qualifications, performance, experience, and business needs. We provide equal employment opportunities and prohibit unlawful discrimination.



Respectful Conduct

We do not tolerate:

- Harassment
- Bullying
- Intimidation
- Threats
- Discrimination
- Offensive or abusive conduct
- Retaliation

Employees should communicate professionally, value differing perspectives, and address disagreements constructively.



Human Rights

Agendia supports internationally recognized human rights and prohibits:

- Forced labor
- Child labor
- Human trafficking
- Exploitation

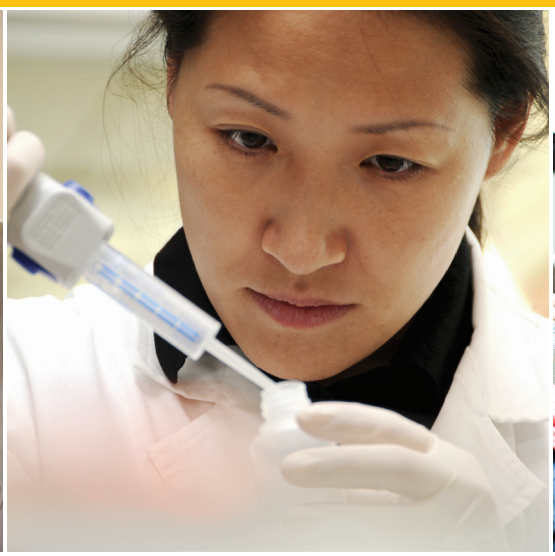
We expect our suppliers and business partners to uphold similar principles.

Health and Safety

Employees are responsible for maintaining a safe workplace by:

- Following safety requirements.
- Using equipment properly.
- Reporting hazards and incidents.
- Completing required safety training.
- Taking reasonable steps to protect themselves and others.

Safety must never be compromised to meet business objectives.


Patients, Quality and Scientific Integrity

Patients First

Patients are at the center of everything we do.

Every sample we process, every result we report, and every decision we make may influence the care of someone facing cancer. Because patients, healthcare providers, and partners rely on the accuracy and integrity of our work, we are committed to maintaining the highest standards of quality, ethics, and scientific excellence.

Quality Is Everyone's Responsibility

Employees must:

- Follow approved procedures.
- Maintain required competencies.
- Use validated systems and processes.
- Document work accurately.
- Report errors, deviations, and quality concerns.
- Participate in continuous improvement activities.

Quality and patient safety must never be compromised.

PRACTICAL EXAMPLE	
⚠ SITUATION	✓ EXPECTED RESPONSE
You notice a process that could increase the risk of reporting inaccurate results, but no actual error has occurred.	**Report the concern.** Potential risks and near misses provide valuable opportunities to strengthen controls before harm occurs.

Scientific Integrity

Our credibility depends on the integrity of our science.

We are committed to conducting research, development, validation, and analytical activities honestly, objectively, and responsibly. Scientific conclusions must be based on evidence, appropriate methodology, and accurate interpretation of data.

Data Integrity

Information must be complete, accurate, attributable, and reliable.

Employees must never:

- Falsify data.
- Create misleading records.
- Alter information improperly.
- Omit material information.
- Destroy records that should be retained.

Every patient deserves confidence in the information we provide.

By maintaining quality, protecting scientific integrity, and speaking up when concerns arise, we reinforce the trust that patients, healthcare providers, and partners place in Agendia every day.

Protecting Information and Privacy



Patients, healthcare professionals, employees, business partners, and others trust Agendia with their sensitive information. Protecting that information is fundamental to our mission, our reputation, and the confidence others place in us.

We comply with applicable privacy and data protection requirements in the locations where we operate and conduct business. Depending on the circumstances, these requirements may include healthcare privacy laws, data protection laws, employment laws, contractual obligations, and industry standards.

We collect, use, access, share, store, and retain information only for legitimate business purposes and in accordance with applicable laws, regulations, contractual obligations, and Company policies.

Every employee shares responsibility for protecting information and preventing unauthorized access, use, disclosure, alteration, or loss.

Personal Information

Employees must protect personal information relating to:

- Patients
- Employees
- Healthcare professionals
- Business partners
- Research participants
- Customers and suppliers

Information may only be accessed, used, or shared for legitimate business purposes.

Patient Information

Patients place extraordinary trust in Agendia.

The information we receive may include highly sensitive medical, genomic, diagnostic, and personal information. Because of the nature of our work, protecting patient information is one of our most important responsibilities.

We access, use, and share patient information only when:

- There is a legitimate business need.
- The activity is permitted by law.
- The activity is consistent with Company policies and procedures.
- Appropriate safeguards are in place.

Patient information should only be shared with authorized individuals who have a valid need to know.

PRACTICAL EXAMPLE	
⚠ SITUATION	✓ EXPECTED RESPONSE
You accidentally attach a document containing patient information to an email sent to the wrong recipient.	Immediately report the incident through established privacy or compliance channels. Even if the recipient confirms deletion of the email, the incident must still be evaluated and documented.

Confidential Information

Confidential information includes scientific, business, financial, commercial, and strategic information that provides value to Agendia.

Employees must:

- Limit access to those with a legitimate need to know.
- Use approved communication channels.
- Protect information while traveling and working remotely.
- Report confirmed or suspected unauthorized disclosures or losses promptly.

Intellectual Property

Innovation is central to Agendia's mission.

The discoveries, processes, technologies, data, software, trademarks, copyrights, trade secrets, and other intellectual property developed by or entrusted to Agendia are valuable business assets that help us serve patients and remain competitive.

Employees are expected to:

- Protect intellectual property from unauthorized disclosure.
- Follow applicable confidentiality obligations.
- Use intellectual property only for authorized business purposes.
- Respect the intellectual property rights of others.
- Report suspected misuse or unauthorized disclosure of protected information.

PRACTICAL EXAMPLE	
⚠ SITUATION	✓ EXPECTED RESPONSE
A former employee contacts you and asks for copies of technical materials they helped create while employed at Agenda.	**Do not provide the materials unless specifically authorized to do so.** Report the request immediately. Company information, research data, and other intellectual property remain the property of Agendia and must be protected appropriately.

Cybersecurity

Employees must help protect Company systems and data by:

- Using strong password and authentication practices.
- Safeguarding devices.
- Remaining alert to phishing and social-engineering attempts.
- Following established security requirements.
- Promptly reporting suspicious activity or incidents.

External Communications and Social Media

Use caution when communicating online.

Even seemingly harmless posts, comments, photographs, or discussions may unintentionally reveal confidential information or create risks for Agendia, our patients, or our business partners.

Only authorized individuals may speak on behalf of Agendia.

Employees must never disclose:

- Patient information
- Confidential information
- Non-public scientific data
- Proprietary information
- Trade secrets

Online conduct should always be professional, respectful, and consistent with this Code.

PRACTICAL EXAMPLE	
⚠ SITUATION	✓ EXPECTED RESPONSE
You are frustrated after a difficult workday and consider posting comments about internal business decisions on a social media platform.	**Pause before posting.** Internal business discussions should remain internal unless authorized for public disclosure. Concerns should be addressed through appropriate company channels rather than social media.

Records, Documentation and Communications

Accurate Records

Accurate information is essential to patient care, sound business decisions, regulatory compliance, and maintaining the trust of our stakeholders.

Patients, healthcare professionals, regulators, business partners, and colleagues rely on the accuracy, completeness, and integrity of the information we create, maintain, and communicate. Whether we are documenting laboratory activities, recording financial transactions, communicating with customers, or preparing internal reports, we are expected to ensure our records reflect the facts honestly and completely.

Documentation Standards

Employees must accurately document:

- Activities performed
- Dates and times
- Individuals involved
- Results obtained
- Relevant observations and conclusions

If work is not properly documented, it may be considered not to have occurred.

Data Integrity

We must never:

- Create false records.
- Backdate documents.
- Alter information to hide errors.
- Omit relevant information.
- Sign for another individual without official delegation or authority.
- Misrepresent facts or results.
- Destroy records that should be retained.

Errors should be corrected appropriately and transparently in accordance with applicable procedures.

PRACTICAL EXAMPLE	
⚠ SITUATION	✓ EXPECTED RESPONSE
You discover a mistake in a document that has already been completed and approved.	Correct the error using approved procedures that preserve the original record and document the correction appropriately. Never conceal, erase, or improperly modify information.

Communications About Our Products and Services

When discussing Agendia's products, services, research, or capabilities, we must ensure information is accurate, balanced, and supported by appropriate evidence.

We should never:

- Make misleading claims.
- Exaggerate performance or capabilities.
- Omit material information.
- Misrepresent scientific data.
- Promise outcomes that cannot be supported.

By documenting our activities completely, truthfully, and communicating responsibly, we strengthen trust in Agendia and help protect the patients and communities we serve

Business Integrity

Conflicts of Interest

We are expected to make business decisions based on what is best for Agendia, our patients, and the stakeholders we serve—not based on personal interests, relationships, or outside influences. A conflict of interest can arise when personal interests interfere, or appear to interfere, with our ability to make objective business decisions.

Not all conflicts are improper. However, conflicts that are not identified, disclosed, and managed appropriately can undermine trust, create legal or compliance risks, and damage Agendia's reputation.

Actual, potential, and perceived conflicts should be disclosed to your manager promptly. Common examples include:

- Outside employment
- Significant financial interests
- Personal relationships with vendors
- Gifts and hospitality
- Business opportunities identified through Company resources

PRACTICAL EXAMPLE	
⚠ SITUATION	✓ EXPECTED RESPONSE
A supplier being considered by Agendia is owned by a close relative.	Disclose the relationship immediately and remove yourself from the decision-making process unless otherwise directed.

Interactions with Healthcare Professionals

Healthcare professionals are important partners in advancing patient care. The relationships we build with physicians, pathologists, laboratory professionals, nurses, researchers, hospitals, health systems, and other healthcare professionals help ensure that patients receive accurate diagnostic information and appropriate care.

Our interactions with healthcare professionals must always be conducted ethically, transparently, and in a manner that supports patient interests.

We earn trust through the quality of our science, services, and professional conduct—not through improper influence or inappropriate business practices.

Activities must:

- Serve a legitimate business purpose.
- Be appropriately documented.
- Support independent clinical judgment.
- Never involve improper influence or incentives such as gifts, entertainment, favors, or other benefits.

PRACTICAL EXAMPLE	
⚠ SITUATION	✓ EXPECTED RESPONSE
A customer suggests that increased testing volume could be encouraged if Agendia proves additional benefits unrelated to legitimate business needs.	Do not proceed. Any arrangement that could be viewed as influencing referrals, ordering decisions, or clinical judgment should be discussed with compliance.

Anti-Corruption

Agendia is committed to conducting business honestly, ethically, transparently, and in compliance with global anti-corruption laws.

We compete based on the quality of our science, services, people, and innovation—not through improper influence, unethical behavior, or unfair business practices. We do not offer, provide, request, authorize, or accept anything of value intended to improperly influence a business decision, obtain an unfair advantage, or secure favorable treatment.

Employees should avoid any situation that could reasonably be viewed as an attempt to influence a business decision improperly and must report warning signs, including unusual payment requests, lack of transparency, undisclosed conflicts, or attempts to bypass established controls.

PRACTICAL EXAMPLE	
⚠ SITUATION	✓ EXPECTED RESPONSE
A customer suggests that Agenda make a donation to a charity they support while a business opportunity is being discussed.	Charitable contributions should never be linked to business opportunities, referrals, purchasing decisions, or other business relationships. Seek appropriate guidance before proceeding.

Agendia works with suppliers, consultants, distributors, service providers, research partners, and other third parties around the world.

We expect our business partners to conduct themselves in a manner consistent with our values and ethical standards. Our reputation may be affected not only by our own actions, but also by the actions of others who represent or support our business.

Employees should exercise appropriate care when selecting, managing, and interacting with third parties.

Potential concerns should be raised whenever a business partner appears unwilling to operate transparently or ethically.

Fraud, Waste, Abuse and Protection of Company Assets

Agendia is committed to conducting business honestly, responsibly, and in a manner that supports appropriate healthcare decision-making.

Fraud, waste, and abuse can harm patients, increase healthcare costs, undermine trust in the healthcare system, and expose individuals and organizations to significant legal, financial, and reputational risks. Because many healthcare systems around the world rely on public or private reimbursement programs, it is essential that our business practices reflect the highest standards of integrity and accountability.

Every employee shares responsibility for helping prevent, identify, and report activities that may involve fraud, waste, or abuse.

What are Fraud, Waste, and Abuse?

Although definitions may vary across countries and healthcare systems, these terms generally refer to:

Fraud

Intentional deception, misrepresentation, or concealment of information for personal or organizational gain.

Examples may include:

- Knowingly submitting false information.
- Falsifying records or documentation.
- Misrepresenting services performed.
- Concealing information to obtain an inappropriate benefit.

Waste

The inefficient, careless, or unnecessary use of resources.

Examples may include:

- Repeated process failures.
- Unnecessary expenditures.
- Misuse of Company resources.
- Failure to follow established procedures resulting in avoidable costs.

Abuse

Practices that are inconsistent with accepted business, ethical, or healthcare standards and that may result in unnecessary costs, inappropriate payments, or improper business advantages.

Examples may include:

- Improper business arrangements.
- Inappropriate use of Company resources.
- Activities that create unfair advantages or undermine independent decision-making.

Responsible Use of Resources

Employees are expected to use Company assets, funds, information, and resources responsibly.

Examples of inappropriate activity may include:

- Personal use of Company funds.
- Unauthorized use of Company property.
- Misuse of expense accounts.
- Improper reimbursement requests.
- Excessive or unnecessary spending.
- Using Company resources for personal gain.

Responsible stewardship of resources helps ensure Agendia can continue investing in innovation, quality, and patient care.

Protecting Company Assets

Employees must safeguard:

- Physical assets
- Information assets
- Intellectual property
- Technology resources
- Financial resources
- Company reputation

Loss, theft, misuse, fraud, or unauthorized disclosure should be reported promptly.

Speaking Up, Investigations and Non-Retaliation

Speak Up

Agendia personnel are required as a condition of employment to promptly report actual or potential matters of non-compliance with laws or regulations, Agendia policies or our Code of Conduct. We have established processes by which reports can be submitted through various channels, including anonymously through Agendia's independently run ICARE Helpline. Personnel are encouraged to use the channel with which they are most comfortable, starting with their Agendia manager. Other channels include:

- another manager or supervisor within Agendia
- directly to the Compliance Officer or other members of the Compliance Team
- Human Resources at Agendia
- the Agendia ICARE Helpline at www.agendia.com/ICARE or by phone at 844-539-2248 (US & Canada)



Investigations

Agendia is committed to reviewing concerns promptly, fairly, objectively, and respectfully.

When concerns are raised, we take them seriously. Investigations help us understand what occurred, identify potential risks, determine whether violations have occurred, and implement corrective actions when needed. Investigations are an important part of our commitment to quality, compliance, accountability, and continuous improvement.

What Happens When a Concern Is Reported?

While every situation is different, investigations typically follow a consistent process:

1. A concern is received.
2. The concern is reviewed and assessed.
3. An appropriate investigator or review team is assigned.
4. Relevant facts and information are gathered.
5. Findings are evaluated.
6. Corrective and preventative actions are implemented when necessary.
7. The matter is documented and closed.

The scope and complexity of an investigation will depend on the nature of the concern.

Investigations are based on facts, evidence, and applicable policies, procedures, and legal requirements—not assumptions, speculation, or personal opinions.

Individuals involved in a review will be treated with professionalism, dignity, and respect throughout the process. A concern being investigated does not mean a violation has occurred.

Information relating to investigations will be shared only with those who have a legitimate business need to know in order to review, investigate, or address the matter appropriately. Complete confidentiality cannot always be guaranteed, but we make every effort to protect privacy and confidentiality.

Employees who become involved in an investigation may also be asked to maintain confidentiality regarding the matter.

Non-Retaliation

Agendia prohibits any party to be subject to disciplinary or retaliatory action as a result of reporting a compliance concern in good faith, whether internally or to any external government or law enforcement agency, or for participation in any investigation or other proceeding related to such a report.

Agendia strictly prohibits retaliation against anyone who:

- Seeks guidance.
- Reports a concern in good faith.
- Participates in an investigation.
- Supports compliance activities.

Retaliation is itself a violation of this Code and may result in disciplinary action up to and including termination.

Any concerns regarding retaliation should be reported immediately.