

The Compliance Committee (“Committee”) has adopted this Compliance Program Framework, which is based upon the seven fundamental elements of an effective compliance program established by the Office of Inspector General (“OIG”) in various industry guidance documents<sup>1</sup> and the United State Sentencing Guidelines<sup>2</sup>. Those seven fundamental elements are:

1. Designating of compliance officer and compliance committee
2. Establish written policies and standards of conduct
3. Provide training and education to employees
4. Provide effective lines of communication between employees and management
5. Conduct internal monitoring and auditing to ensure compliance
6. Enforce policies and standards of conduct through disciplinary guidelines
7. Respond to detected offenses and take corrective action

## I. COMMITTEE AND LEADERSHIP STRUCTURE

Illumina’s General Counsel has been designated as its Chief Compliance Officer. As a member of the Committee, he has overall responsibility for oversight of the Company’s compliance programs. Along with the Committee, he is responsible to guide and manage the development and operation of the programs, including developing and implementing policies, procedures, and practices designed to ensure Illumina’s compliance with applicable federal and state laws, regulations and with Illumina policy.

The Committee will meet quarterly or more frequently if needed to oversee the implementation and maintenance of robust compliance programs in all areas subject to such legal, regulatory and policy compliance.

- A. Appropriate Executive Owners – The Committee will identify and designate appropriate executive owners to address identified areas of compliance oversight. These executive owners will function as the contact point for employees in their area of compliance to report actual or suspected compliance issues. The executive owners are responsible to report to the Committee all compliance matters brought to his or her attention.
- B. Illumina Employees – Illumina employees, at all levels of the organization, are responsible for conducting themselves in an honest and ethical manner consistent with applicable laws and Illumina policy.

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<sup>1</sup> OIG Compliance Program Guidance for Pharmaceutical Manufacturers (Federal Register 68, May 5, 2003);  
Publication of OIG Compliance Program Guidance for Clinical Laboratories (Federal Register 63, August 24, 1998)

<sup>2</sup> United States Federal Sentencing Guidelines, 2018 Guidelines Manual

## II. WRITTEN POLICIES AND PROCEDURES FOR COMPLIANCE

At the core of our compliance program are ethical standards and compliance principles that guide our daily conduct as stated in our Code of Ethics. The Code of Ethics and other policy and guidance documents at Illumina set forth Illumina's expectation and requirement that all employees and agents of the Company act in accordance with all laws, regulations and applicable Company policies and otherwise uphold Illumina's high standards of business ethics.

## III. EFFECTIVE TRAINING AND EDUCATION OF ILLUMINA'S EMPLOYEES

Education and training is critical to the success of the compliance programs. Illumina is committed to implementing programs to effectively and timely communicate to affected personnel. Code of Conduct Training is currently required of all employees and will be enhanced and updated on an as-needed basis. Additional risk-specific compliance training is assigned to employees with job roles and responsibilities that encounter these risks and such training will be reviewed and updated on an ongoing basis.

## IV. EFFECTIVE LINES OF COMMUNICATION

Illumina is committed to fostering a culture of compliance. Critical to its efforts is open communication. Illumina is "open, physically and philosophically" and the Committee encourages employees to discuss all issues, concerns, problems and suggestions with their immediate supervisor or other managers without fear of retaliation and with the assurance that the matter will be kept as confidential as possible. If an employee prefers, where lawful, such issues, concerns, problems or suggestions, including those from outside the Company, may be made on an anonymous basis, 24 hours a day, 7 days a week, via the Compliance and Fraud Prevention Hotline by calling 800-461-9330, or it can be made electronically on [this website](#), which is also available via a link on the corporate intranet site.

The Company will not permit acts of retaliation or retribution against an employee who in good faith reports a potential, suspected, planned or actual violation. Such acts will be dealt with appropriately.

## V. INTERNAL AUDITING AND MONITORING

Illumina's compliance programs will continue and expand the Company's practice of internally monitoring, auditing, and evaluating compliance issues. These activities will be expanded under the direction of the Committee to address new identified areas of compliance. These monitoring activities are intended to identify potential or existing problem areas and to take corrective measures in an effort to prevent the recurrence of non-compliance.

## **VI. RESPONDING TO POTENTIAL VIOLATIONS**

An additional role of the Chief Compliance Officer, or his designee, is to oversee the review of non-compliance reports and determine whether further investigation is necessary. When deemed necessary, the Chief Compliance Officer, or his designee, will conduct an investigation into potentially non-compliant activity to determine whether a violation has occurred.

## **VII. CORRECTIVE ACTIONS**

It is expected that the compliance programs will increase the likelihood of preventing, or at least identifying unlawful and unethical behavior. However, even an effective compliance program may not prevent all violations. In order to address such violations, the Committee will take action as necessary to respond promptly to potential violations of law or company policy, take appropriate disciplinary action, assess the root cause of the violation, and take appropriate corrective measures. Corrective measures take into account the findings of reviews of non-compliance, and may include appropriate and consistent disciplinary action regardless of the individual's position within the organization (up to and including termination), assessing whether enhancements should be made to our policies, practices, training, or internal controls, and taking action to prevent future non-compliance.