# **Code of Conduct**



**Vyriad** genetics<sup>®</sup>

## **Company values**

## We value being:



### Collaborative

We contribute to a greater cause, and partner with others to achieve shared goals. Our openness ensure we foster an environment that encourages ideas and individuals to thrive.



### Innovative

We look to lead the field with a bold, imaginative, and purpose-driven approach. As we face the future, we stand ready to adapt to stay ahead and light the way.



### Inclusive

We seek missing perspectives and strive to make all feel like they belong. We embrace diversity, equity, and inclusion in everything we do, and invite all to hold us accountable.



### Caring

We listen, learn, and look for new ways to help each other and our communities. That means working in the service of care providers and patients and defining our success through theirs.



### Committed

We're driven by challenges standing in the way of progress, and remain diligent, determined, and accountable in how we embrace change.



## Integrity and Myriad Genetics' Code of Conduct

Our patients and providers count on us to do the right thing – ethically, legally, and in a caring, human way. At Myriad Genetics, we prioritize integrity in all we do. We understand how important it is to live our values and treat others with respect as we put our Code of Conduct in action.

Each one of us plays an essential part in protecting our mission to advance health and well-being for all. Our promise is to illuminate the path to better health through genetic insights. We do that by empowering patients to take control of their own health and helping healthcare providers better detect, treat and prevent disease. Our purpose is meaningful, and we honor it with a strong focus on business integrity, risk management, and access to training and support.

The Code of Conduct is a helpful guide that provides definitions, context and clarity of our guidelines. Please review and become familiar with it as it will help you gain a better understanding of your role in maintaining Myriad's reputation and instilling confidence in each of our stakeholders both internally and externally. If you have any questions about the Code, feel free to reach out to Myriad's Corporate Compliance and Ethics Department. Thank you for your commitment to representing Myriad Genetics with integrity.

Paul Diaz President and CEO Myriad Genetics, Inc.





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## **About our Code of Conduct**

Today's business and healthcare settings are complex and fast paced with ever-changing regulations and laws. Myriad Genetics pledges to foster an environment where every person is empowered to conduct themselves in the most ethical, honest, and upright ways. Commitment to following our Code of Conduct demonstrates our promise to uphold our values and mission. The ultimate reputation and success of our company lies in the hands of every person who represents Myriad. This Code of Conduct provides guidance on the expectations for how we act, make decisions, and ensure we are compliant with the laws and regulations that guide our business. While not all inclusive of every possible scenario, the Code provides an overview of the business and ethical principles that are expected of every person when conducting Myriad business and performing day-to-day duties.

This Code applies to Myriad Genetics, Inc. and all its subsidiary organizations, employees (full time, temporary, contracted), students, agents, and Board members. Compliance with the Code is a condition of employment or ability to contract with Myriad in any capacity. It it the responsibility of each person to follow all laws, regulations, policies, and procedures as applicable; conduct business according to the highest ethical and legal standards; and report concerns and known or suspected misconduct immediately.



One of Myriad's key values – COMMITTMENT – states "We're driven by challenges standing in the way of progress, and remain diligent, determined, and accountable in how we embrace change." Our Code of Conduct is our declaration that whatever challenges we face we will overcome them in ethical and honest ways, no matter the circumstance.

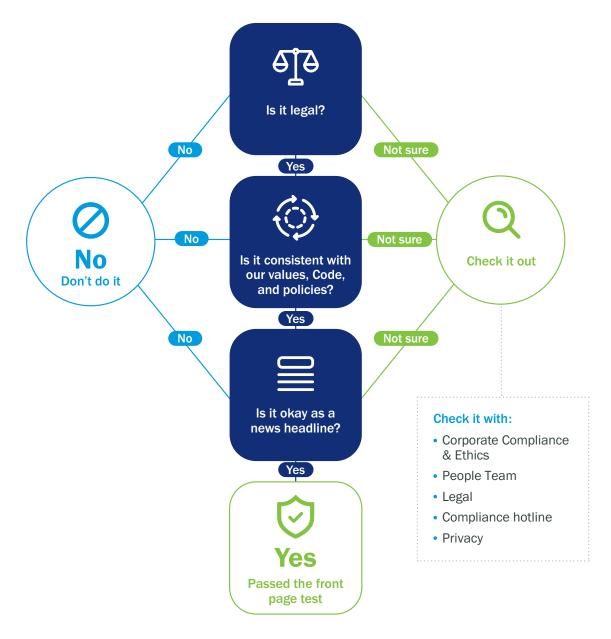
#### What's next:

- Read the Code and familiarize yourself with the standards and expectations.
- Familiarize yourself with the resources available to you for additional questions or concerns.
- Understand the additional responsibilities you have under the Code if you are in a leadership position within the company.
- Know your responsibility and requirement to report any suspected or confirmed violations as outlined in our Code of Conduct.

#### The front page test

Although the Code is specific about many expectations, it does not cover every situation or question that you may have about an issue. If you are questioning a proposed course of action or decision and are unsure of what to do next, you have several options and resources available. Another quick way to determine if an action is likely in line with Myriad's values and mission is to run the "Front Page Test."

Still have questions? Myriad has multiple ways you can ask for guidance or report concerns.



## **Reporting concerns**

It is a condition of employment to report actual or suspected violations of the Code of Conduct, policies or procedures. Myriad maintains a culture and environment that is free of retaliation against anyone who makes a good faith report of known or suspected legal or ethical misconduct. A "good faith" report means that the information provided is true and accurate to the best of your knowledge.

If you are unsure if you should report... report it! It is not an expectation of individuals to investigate issues or concerns – speaking up about concerns allows Myriad leadership to investigate and resolve quickly. Reporters will be treated consistently and fairly as their concerns are reviewed during the investigative process. As part of the Code, individuals are required, when requested, to fully participate in internal investigations. Investigations are conducted in the most confidential manner possible. Myriad prohibits retaliation against anyone who reports a concern or participates in an investigation. If you believe you have experienced retaliation you should report your concerns immediately to the Compliance and Ethics Department or the People Team.

#### How to report a concern or who to contact for guidance

Myriad wants to hear from you and has provided multiple avenues in which you can speak up. You may raise a concern in the manner you are most comfortable. Speaking to your direct supervisor or manager is always a great place to start. You may also go directly to the Chief Compliance Officer, a member of the Compliance or Legal team, or the Myriad People Team.

The Myriad Compliance Hotline is also another way to speak up about suspected violations of the Code or other matters.

#### The Hotline can be reached at <u>MyriadHotline.com</u> or by calling 1-866-685-8668.

Using the Hotline also provides an option to report your concerns anonymously. If you chose to make an anonymous report, your anonymity will be protected to the fullest extent possible. It is important to note that maintaining your anonymity may limit our ability to investigate your concerns fully. As a reminder, any method you chose to report a concern will be treated with the utmost concern for your confidentiality.



One of Myriad's key values of CARING states "We listen, learn, and look for new ways to help each other and our communities. That means working in the service of care providers and patients, and defining our success through theirs." A crucial way we can demonstrate care for each other, our customers and patients is to vocalize when something is not right. As a company that is committed to always "doing the right thing" we can only be successful when everyone is dedicated to the same goal.

#### **Other resources**

- Compliance and Ethics Department: Advice on the Code of Conduct, policies, and how we comply with laws, regulations, and industry standards. Contact them at <u>Compliance@myriad.com</u>. Or utilize the Compliance Hotline at <u>MyriadHotline.com</u> or by calling <u>1-866-685-8668</u>.
- **Privacy Department:** Advice on privacy related issues including HIPAA and related policies and procedures. Contact them at <u>Privacy@myriad.com</u>.
- Legal department: Advice on compliant business operations in regard to laws, contracts, intellectual property and anti-trust laws. Contact the attorney for your Business Unit as assigned.
- Myriad People Team: Advice on human relations related questions including benefits, employment and workplace issues. Contact them at <u>HumanResources@myriad.com</u>.

#### **Consequences for code violations**

Violations of our Code may carry serious consequences including disciplinary action up to and including termination. Those violating the Code may also face civil or criminal liability. Violations include asking other employees, third parties, contractors or anyone else to violate the Code, not reporting a Code violation, and failing to cooperate in a Code investigation.

Leaders at Myriad have additional responsibilities under our code. Beyond acting as role models of the highest standards of ethical business conduct, leaders are expected to create a positive work environment where people are comfortable raising questions, concerns and reporting suspected violations of the Code. Fostering an environment that encourages reporting without the fear of retaliation is a key leadership expectation.





## **Our Code of Conduct**

#### Compliance with laws, policies and procedures

You have a responsibility to understand and follow all laws that apply to your job and our business. If you are unsure about a law or legal obligation, consult the Corporate Compliance and Ethics, Privacy, or Legal Department.

There are various laws and guidelines that apply to our business including, but not limited to:

- The Anti-Kickback Statute (AKS)
- The Foreign Corrupt Practices Act (FCPA)
- The Physician Self-Referral Law (Stark)
- The False Claims Act (FCA)
- The Food, Drug and Cosmetics Act
- The Civil Monetary Penalties Law (CMPL)
- Clinical Laboratory Improvement Amendments (CLIA)
- HIPAA Privacy and Security Regulations
- Sanction Screening/Import/Export Laws
- General Data Protection Regulation (GDPR)
- AVAMED Code
- American Clinical Laboratory Association (ACLA) Code
- MedTech Code
- Modern Slavery and Human Trafficking Laws

#### **Dealing fairly with others**

#### Fair competition and anti-trust law

We want those with whom we do business to view our company as reliable, honest and trustworthy. Myriad's success is based on the innovation, quality and value of our products and not by conducting illegal or otherwise improper business practices. Myriad will not discriminate in prices offered to various customers, set unfair prices below cost or make false statements about competitors. We will not work with competitors to fix prices or bids, allocate markets amongst us, boycott certain organizations or make noncompetitive agreements.

#### Myriad's policy is to comply fully with the US antitrust and international competition laws.

The Company recognizes that antitrust law exists to promote competition for the benefit of those we serve and prevent unfair or harmful business practices. Failure to follow these laws may lead to serious fines and criminal penalties. Antitrust laws create competition by fostering an open marketplace that prohibits:

- **Price fixing:** Competitors cannot agree on or manipulate the prices they will charge for their products and services. You should never discuss our pricing or pricing practices with a competitor.
- Market manipulation: Collaborating or exchanging information with competitors to restrain competition in any way, such as by dividing customers or markets, is both illegal and forbidden by the Code.
- **Monopolization**: It is illegal for a company to "monopolize" a market. You should also avoid any conduct that could be termed "predatory."

If a competitor begins to discuss prices or other prohibited topics at a meeting or other activity, you should refuse to participate, and if the discussion is not stopped immediately, you should excuse yourself.



One of Myriad's key values is to be an INNOVATIVE company that "looks to lead the field with a bold, imaginative, and purpose-driven approach. As we face the future, we stand ready to adapt to stay ahead and light the way." A key principle of pursuing innovation is accomplishing it within the boundaries of fair competition and permitted practices. We can only truly be a leader in the field when we approach our business with compliance in mind.

#### **Protecting shareholder assets**

Appropriate use and management of Myriad's assets – such as equipment, supplies, funds, records, information – is critical to effectively serving our customers and providing a fair return to our shareholders. We will always be mindful to safeguard these assets, avoid waste and make the best use of them.

#### Accurate documents, audits and records

Accuracy in record-keeping is essential to maintaining the trust of our patients, stakeholders, customers, government auditors and business partners. This is a responsibility we all share to ensure our records accurately and honestly reflect all transactions and business operations. Never misreport or misrepresent data or information.

- **Record Retention:** In order to maintain an efficient and responsible record management program, you should familiarize yourself with the record management processes applicable to your job duties and follow our record retention schedule.
- Legal Holds: When the company has litigation or an investigation, sometimes the Legal Department may ask for documents to be saved beyond normal time-frames. When this happens, you will receive a notice called a "Legal Hold," meaning these records cannot be destroyed until notification is received from the Legal Department.

#### Use of company property and systems

- Myriad maintains a wide range of electronic devices and networks for use across the company. While mobile phones, internet access, e-mail and other systems can enhance our productivity, they must be used appropriately so as not to expose our data and systems to security risks. This means:
- Passwords must not be revealed to others and should be changed on a regular basis.
- Unauthorized software should not be installed on Myriad's computer system.
- Myriad business information should only be shared with authorized parties using company-approved technology.

Although Myriad equipment and communication systems may be used for incidental personal matters, we should use good judgment and should not expect privacy to be guaranteed when using company provided equipment except where mandated by law.

#### Inside information / Insider trading

Myriad expressly forbids anyone from trading on or communicating material non-public information to others in violation of the law. This conduct is frequently referred to as "insider trading." As an employee of Myriad, you may learn about Company information related to sales, product launches, mergers and acquisitions, etc., that could affect the Company stock. It is illegal to buy, sell or trade stock based on this information before it has become public. This policy applies to every employee of the Company and extends to both internal and external activities related to the Company, such as trading for a personal account.

The concept of who is an "insider" is broad. It includes officers, directors, consultants and employees of a company, and can include anyone living in the same household of an employee (whether related or not), and anyone dependent on an employee (whether living in the same household of an employee or not).

In addition, a person can be a "temporary insider" if they enter into a confidential arrangement regarding the company's affairs and as a result, is given access to information solely for the company's purpose. A temporary insider can include, among others, a company's investment advisor, agent, attorney, accountant, and lending institution, as well as the employee of such organization. An employee may also become a temporary insider of another company with which Myriad has a contractual or other business relationship.



#### Safeguarding proprietary and confidential information

You are responsible for safeguarding any confidential or proprietary information which you are exposed to while working for Myriad. You may not disclose such confidential information to others outside or within Myriad, unless required by law.

During the normal course of business you may become aware of confidential or proprietary information about the Company, our current or prospective customers/suppliers or other third parties.

You must maintain the confidentiality of all Company information entrusted to you. The obligation to preserve confidential information continues even after you are no longer employed by Myriad.

Employees are not limited from disclosing confidential information to the extent such disclosure is required by law, or to a court or government agency to the extent an employee has a protected right to do so.

#### What is considered confidential information:

Confidential information, whether or not marked "confidential," includes any company data or sensitive information which is not intended for public disclosure.

Examples of confidential information include trade secrets, processes, wages, operations, sales, internal communications, financial data, profit and loss data, business strategies, certain patient or vendor data, or other information of commercial value.

Other examples include confidential information of other companies received by Myriad under a confidentiality agreement. You should treat the confidential information of other persons or companies with the same level of care as Myriad confidential information.

Q: A former Myriad employee who worked on my team recently contacted me to request that I provide copies of some project materials we worked on together during his/her employment. What should I do?

A: Do not, under any circumstances, provide copies of the requested materials, as they contain confidential Myriad information.

## **Privacy**

#### **Patient privacy**

We respect the privacy of all our patients and have taken steps to safeguard personal and confidential information that we are required to obtain for business or legal purposes. Access to patient information, such as personally identifiable information (PHI) and medical records, is strictly limited by Company policy and domestic and international privacy laws and regulations. You must maintain the confidentiality of all patient information entrusted to you. Materials that contain patient information – such as flash drives and laptop computers – must be stored securely in compliance with Company policy. Safeguard confidential information by:

- Ensuring that conversations involving confidential information are not overheard in public places
- Always using secure networks
- · Only accessing patient information on a need-to-know basis
- Protecting mobile devices from theft

#### **Employee privacy**

We respect the privacy of our current and former employees. Access to employee data, such as personnel information and medical records, is strictly limited by Company policy, privacy laws, and regulations. You are not permitted to access your own medical information under state laws unless necessary to perform your job with the Company. While Myriad respects your privacy, the Company reserves the right to inspect facilities and property, such as computers, telephone records, lockers, emails, files, business documents and workplaces.

Q: I recently had a test performed at Myriad and would like to look up my results. Is that permissible?

A: No, you cannot access your own medical records at Myriad. Contact the Customer Service team to get a copy of your records

#### Social media use

Media relations and public communications regarding Myriad are the responsibility of our Corporate Communications and Investor Relations Departments. Myriad employees are prohibited from engaging in public communication or comment on behalf of the Company about Myriad stock or business operations. This includes any discussion that takes place via social media avenues, such as Facebook, Twitter, LinkedIn, or any comment threads associated with news articles. If you become aware of communication which you believe should be brought to the attention of Myriad, please inform the Corporate Communications and Investor Relations Departments.

#### **Media inquiries**

Myriad values its relationships with the media and tries to provide full and prompt disclosure of all material developments or events. Media relations are the responsibility of Myriad Corporate Communications and Investor Relations Departments and all statements to the media or responses to inquiries from the media must be either handled through them or with their help. If you are asked for a Myriad-related statement from the media, respond by explaining this policy and ask the questioner to contact the Corporate Communications and Investor Relations and Investor Relations Departments.



## **Conflict of interest**

#### Avoiding conflicts of interest

A conflict of interest may exist when your loyalties or actions may be divided between Myriad's interests and those of another party, such as a competitor, supplier, family member or customer. Both actual or perceived appearance of a conflict should be avoided. If you are unsure as to whether a certain transaction, activity, or relationship constitutes a conflict of interest, you should discuss it with the Chief Compliance Officer.

When you have a potential conflict of interest, the Company expects you to come forward and disclose it so that it can be managed, reduced or eliminated. Failure to disclose a potential conflict of interest is a violation of the Code.

#### **Outside employment and service**

There is a potential for a conflict of interest if your outside business or interests affect your performance or engagement as a Myriad employee. We cannot request or accept salaries, fees, commissions or other compensation from anyone with current or potential business ties to Myriad or one of our competitors.

We also cannot serve with an organization that has current or potential business ties to Myriad, even if compensation is not paid. Exceptions require the approval of the Corporate Compliance and Ethics Department.

#### **Financial interests**

Employees cannot hold a financial or other interest in Myriad's suppliers, customers or competitors, except for a holding that is not likely to provide the appearance that our business judgment is compromised. Reasonable interests must be reviewed by the Chief Compliance Officer or designee to ensure that the interest will not interfere with responsibilities to Myriad. A financial interest does not include security holdings of a supplier, customer or competitor in a mutual or index fund or similar investments where the individual does not have direct investment control.

#### **Corporate opportunities**

As an employee, you may become knowledgeable of other external business-related opportunities. Potential business, if within the scope of the Company's existing or contemplated business, remains under the ownership of Myriad. Such prospects must not be taken advantage of for personal gain without the prior written approval of the Corporate Compliance and Ethics Department.

#### **Related party transactions**

Related parties are those with whom you have a close relationship, for example family members or friends. You may not conduct Myriad business with related parties without the prior written consent of the Chief Compliance Officer or Corporate Compliance and Ethics Department.

#### Gifts, hospitality and payments

**Receiving gifts:** Gifts, favors, entertainment, gift cards, cash or other inducements may not be accepted by employees or their immediate family members from any person or organization that does or seeks to do business with, or is a competitor of Myriad. Common industry-norm courtesies, such as hospitality provided as a modest meal during a business meeting, are usually acceptable from non-referral source entities.

If the hospitality is of more than a reasonable, industry-norm value, the Compliance Department must approve its acceptance or retention. Hospitality may never be accepted from referral sources such as HCPs. An especially strict standard applies when suppliers are involved. If a meal unduly influences or makes an associate feel obligated to "pay back" the other party with business, receipt is unacceptable.

**Giving gifts:** There are different rules in this area dependent upon the recipient of the gift. In later sections, there is specific information on giving gifts to HCPs (forbidden), Government Officials (GOs) (dependent on local laws), and Private Business Partners (permissible within certain parameters and limitation). Please refer to these sections to ensure compliance.

#### Q: What is a conflict of interest, and why should they be avoided?

A: A "conflict of interest" is a Myriad business decision that may result in personal gain for ourselves, a relative or a friend. These situations may draw into question our impartiality or the integrity of Myriad's decision- making processes and must therefore be disclosed to, and evaluated by, the Company to avoid such negative outcomes.



## **Cultivating a positive work environment**

#### **Our Myriad culture**

In an effort to create a culture that promotes the five key Myriad values, the Code of Conduct outlines behaviors that foster a work environment where we feel comfortable, valued and safe. Treating each other, and those with whom we do business, with care demonstrates our pledge to being a collaborative, innovative, inclusive and committed organization. How we interact with each other, our business partners and our customers is a key to our ultimate success. The sections below highlight Myriad's expectations of how we conduct ourselves and our business.

#### Diversity, equity, inclusion and equal opportunity

Myriad's key value of INCLUSIVITY states "We seek missing perspectives and strive to make all feel like they belong. We embrace diversity, equity, and inclusion in everything we do, and invite all to hold us accountable." Myriad is an equal opportunity employer and as such, affirms in policy and practice to recruit, hire, train, and promote in all job classifications without regard to race, color, religion, sex, gender, gender identity, sexual or gender preference, transgender status, sexual orientation, age, national origin or veteran status. Employees can expect to be treated with respect at all times.

#### Harassment

Myriad's key value of creating a COLLABORATIVE environment states "We contribute to a greater cause, and partner with others to achieve shared goals. Our openness ensures we foster an environment that encourages ideas and individuals to thrive." We cannot create a collaborative workspace when harassment or discrimination of any type is tolerated. Harassment is considered any unwelcome conduct towards another person that creates a hostile or offensive work environment. Myriad does not allow discrimination or harassment and will not permit retaliation against anyone for reporting such behavior.

#### Safe workplace practices and maintaining a violence-free workplace

Our company strives to provide a safe and healthy workplace for employees, customers and visitors to its premises. All leaders have the responsibility for ensuring proper safety and health conditions for their employees. Employees are responsible for observing all safety and health rules, practices and laws that apply to their jobs, and for taking precautions necessary to protect themselves, their co-workers and visitors. Employees are also responsible for immediately reporting accidents, injuries, occupational illnesses and unsafe practices or conditions to their supervisor. Threats, acts of violence and physical intimidation are strictly prohibited. No talk of violence or joking about violence will be tolerated. As is the case with any violation of the Code, employees have a responsibility to report any unsafe behavior or condition regardless of whether they are directly involved or a witness.

#### **Our interactions with others**

#### **Interactions with Health Care Professionals**

For purposes of this Code, a Health Care Professional (HCP) includes:

- any person (including a physician), hospital, group practice or other entity that is authorized to order testing or employs anyone authorized to order testing;
- a client, potential client or any other person who is in a position to influence the purchase or referral of our company's products or services;
- the immediate family members of anyone noted above. An immediate family member is considered a spouse, parent, step-parent, sibling (and their spouses), children (and their spouses), step children (and their spouses), grandparents, or grandchildren.

As used in this Code, HCP does not include any employee of our Company.

Numerous federal and state laws govern our relationships with HCPs, including the Anti-Kickback Statute and the Stark Law. These laws can be complicated and very strict. For example, the Anti-Kickback Statute makes it illegal to offer gifts, bribes, payments or other financial incentives to HCPs in exchange for referrals or other medical services paid for by government funded health programs. In addition, the Stark Law prohibits HCPs from making referrals for healthcare services to an entity if they or an immediate family member has a financial interest in that entity. These laws are part of the government's laws to protect health programs and patients from potential fraud and abuse. Any situation in which Myriad may make a payment, purchase items, enter into a contractual relationship, or provide something of value to another party must be reviewed to ensure the financial relationship is acceptable under applicable laws. The Company does not engage in any conduct that is intended to, or has the appearance of, improperly influencing an HCPs judgment.

Review the applicable Compliance policies and contact the Corporate Compliance and Ethics or Legal Departments for guidance if you have any questions.

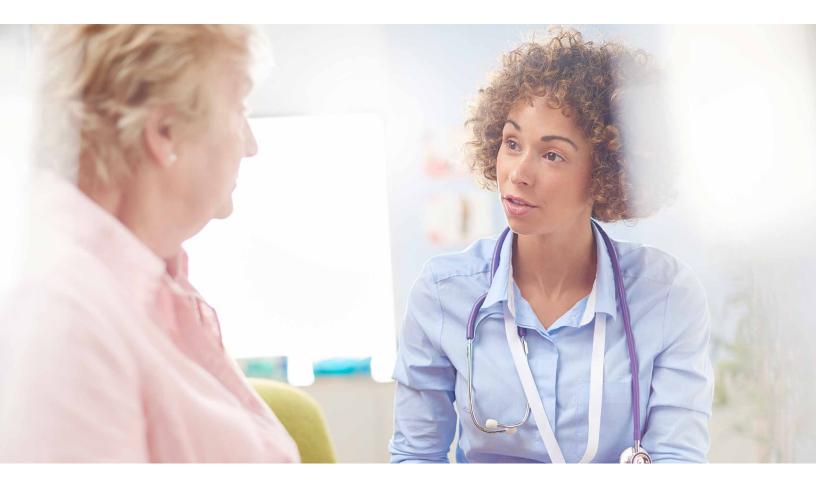
Federal and state laws as well as our policies forbid us from giving gifts or providing entertainment to HCPs in the United States. All employees must know and comply with our policies and understand what is considered acceptable offerings to an HCP and under what circumstances.

Internationally, please refer to the International Guide on Interactions with Healthcare Professionals and Government Officials and/or consult with the International Compliance Officer.

#### The Company may provide modest business meals if:

- we are promoting Myriad products and services;
- a Myriad representative attends the meal with the customer;
- the cost and frequency are moderate;
- new or continued business is not an implicit or explicit condition of the meal;
- the meal does not violate any rule or regulation;
- the value of the meal does not exceed the annual dollar limits established by the government and Myriad policy.

The value of all food provided to an HCP must be reported, logged and tracked per company policy and procedure.



#### Interactions with government officials and investigations

It is Myriad's policy that all business transactions will strictly follow the laws, rules and regulations which cover interactions with governments and Government Officials (GOs). Meetings with GOs should only be conducted through or with the help of the Government Affairs Department. You may not seek or accept government or competitor information, whether orally or in writing, if there is reason to believe that the release of such information is unauthorized or would give Myriad an unfair competitive advantage for procurement and competitive bids and proposals. Special rules often apply to conducting business with governments as opposed to private parties. Employees and Company representatives must have approval before providing anything of value to a government employee. Myriad prohibits the payment of bribes to government employees, political parties or candidates for political office.

The prohibition on bribes applies to third parties acting on behalf of Myriad, including all consultants and suppliers. You must not engage a contractor or consultant if you have reason to believe that the contractor or consultant may attempt to bribe a GO.

#### **Government investigations**

To make sure we respond appropriately, promptly contact the Corporate Compliance and Ethics or Legal Departments for assistance if you receive an inquiry or request from a GO or agency. Do not provide information until you have obtained permission to do so. Certain routine inspections may be handled without the involvement of the Legal or Corporate Compliance and Ethics Departments.

**Policy of cooperation**: It is Myriad's policy to cooperate fully with any appropriate governmental investigation. No employee should ever (i) destroy any Myriad documents in anticipation of a request for those documents from a government agency or a court, (ii) alter any Myriad documents or records, except as provided in corporate policy and procedures manuals (iii) lie or make any misleading statements to any government investigator, or (iv) attempt to improperly influence an employee or any other person not to provide information to any government investigator or to provide false or misleading information.

What should you do if you get a government request for information? Notify the Legal Department first. Myriad has the right to legal representation. Therefore, if you are approached by any government investigator regarding Myriad or any of its subsidiaries, or your activities related to employment at Myriad, you should first consult with the Legal Department before answering any questions, even if the request is made at your home in the evening. In addition, you should advise the Legal Department, at any time, if you have reason to believe that a government investigation might occur or if you believe that a government investigation is underway.

#### Interactions with private business partners

A private business partner is an external person or entity with whom Myriad may work on specific projects or operations, but from whom we do not expect to generate referrals or legislative or regulatory advantages. Typically, these will not be Health Care Professionals (HCPs) or Government Officials (GOs); if a relationship with either such party is proposed, the Legal Department should be contacted before any commitments are made or collaborative work is performed. Examples of private business partners may include technology or software providers, companies from whom we may purchase products or services, joint ventures and others.

In the normal course of business discussions Myriad employees may provide meals or exchange small tokens with private business partners (e.g., a Myriad-branded memento or a modest gift of appreciation may be appropriate). These are allowed if they are:

- not to a referral source such as an HCP, or to a GO;
- consistent with customary business practice;
- not excessive in value and cannot be construed as a bribe or pay-off;
- not in violation of applicable law or ethical standards; and
- not likely to embarrass or harm the Company, employee, or private business partner if publicly disclosed.

## Q: Why do we follow the AdvaMed Code of Conduct for Interactions with US Health Care Professionals?

**A**: The code provides Myriad with helpful guidance on ethical interactions and relationships with HCPs based on innovation, education, integrity, respect, responsibility and transparency. All interactions with HCPs must be for bona fide and legitimate business reasons, follow ethical business practices, and comply with all applicable Myriad policies.

#### Interactions with our communities

The communities in which we operate provide a strong workforce as well as useful resources. In return, Myriad is committed to being a responsible corporate citizen in our communities.

Corporate social responsibility plays an important role in our approach to discovering and delivering valuable, transformative diagnostic tests to improve patients' lives. We believe that our corporate social responsibilities enable us to:

- Build greater value for our patients, healthcare professionals and shareholders;
- Support and improve the communities where we live and work; and
- Empower our employees to become more engaged in the well-being of their own communities.

#### **Charitable contributions**

Myriad's Charitable Contributions Policy was established to ensure that our corporate resources are wisely allocated, and are not granted as a means to influence referral sources or for other improper purposes. Giving back to the communities we support is an important part of the Myriad culture.

#### **Political contributions and activities**

Myriad encourages all employees to vote and be individually active in the political process. However, federal and state laws restrict the use of corporate funds,, directly or indirectly, in connection with political parties, candidate campaigns, and elections. Accordingly, it is against Myriad policy, and may also be illegal, to : (i) obtain, directly or indirectly, reimbursement from Myriad for any political contribution or donation, including the cost of fund-raising tickets for political contribution, (ii) use any Myriad property or facilities for any political activity, or to (iii) use Myriad time for any political purpose. The political process has become highly regulated. The Government Affairs Department or the Chief Compliance Officer should be contacted to provide guidance prior to any Company representative agreeing to do anything that could be construed as involving Myriad in any political activity.

This does not preclude, where lawful, Company expenditures to support or oppose public referendum or separate ballot issues, or the formation and operation of a political action committee.



#### **Interaction with our Global Business Partners**

Because each region in which we operate presents unique business situations, we must be mindful of different approaches to conducting business while ensuring that we do not compromise local laws, regulations, policies and Myriad's values and standards. Our activities around the world on behalf of Myriad must demonstrate our commitment to abide by local laws and regulations and uphold the Company's Code of Conduct.

#### **Anti-bribery and corruption**

We must conduct business in an ethical and lawful manner and comply with all applicable anti-corruption and anti-bribery laws and regulations. Engaging in bribery or other forms of corruption, or even appearing to engage in such activity, can expose Myriad to legal action. Employees may not directly or indirectly (through a third party) pay, promise, offer or authorize any bribe or facilitation payment. A facilitation payment or "grease payment" is a payment to a non-US Government Official, given with the intent to expedite an administrative process.

#### Imports / exports and boycotts

Since Myriad is a global business, it is important that you are familiar with import/export laws and Myriad's related policies and procedures if your job responsibilities are in any way related to the import or export of materials and information. This includes the transmittal of technical data across national borders using the internet or other electronic means.

Additionally, there are times when the United States and other governments institute boycotts or restrict trade as part of foreign policy and national security activities. Any business requests that may relate to territories under boycott must be referred to the Legal Department.

#### **UK Modern Slavery Act & California Transparency in Supply Chain Act**

Myriad is committed to acting in a manner that supports our core values and ethical culture and we hold our suppliers to these same standards. We expect that each of our suppliers conduct business in a legal and ethical manner. In accordance with applicable laws, our vendors shall not engage in human trafficking or slavery to help eliminate forced labor and human trafficking in our supply chain.





Our reputation depends on the actions of each and every employee throughout the world every second of every minute of every day.

## Myriad Genetics, Inc. Code of Conduct attestation

#### Please check the boxes and sign below.

As applicable to my work responsibilities-

	I have read,	understood,	and agree	to abide by	Myriad's	Code of	Conduct.
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- I understand that I have a duty to report real or suspected concerns about violations of this Code of Conduct, or any laws, rules, regulations, or standards applicable to Myriad.
- I understand that Myriad has a non-retaliation policy for good faith reports of real or suspected concerns regarding non-compliance.
- I will deal honestly and ethically in Myriad and on Myriad's behalf.
- I will comply with all laws, rules and regulations applicable to my work responsibilities and will call Legal or Corporate Compliance & Ethics with questions if I am unsure of how the rules apply.
- I will comply with all Myriad standards, policies and procedures.
- I will avoid or will promptly disclose actual or apparent conflicts of interests with Myriad's interests.
- If approached by the media for any reason, I will direct them to our Corporate Communications or Investor Relations Department.

Print name and title

Signature

Date



### **Myriad Corporate Compliance & Ethics**

### Compliance@Myriad.com

DEC 2023

