

Code of Conduct



We value being:



Collaborative

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.



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 Genetic's Code of Conduct

Teammates,

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.

All of you play 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. Our Compliance and Legal teams are here to support us, but we all carry a personal responsibility to embrace the highest ethical standards.

That is why I'm pleased to share the Myriad Genetics Code of Conduct. This helpful guide provides definitions, context and clarity around our guidelines. Please review and become familiar with it. It will help you better understand your role in maintaining Myriad's reputation and instilling confidence in all our stakeholders, inside and outside the company.

If you have any questions about the Code, feel free to reach out to Myriad's Corporate Compliance & Privacy Department. Thank you for your commitment and for always representing Myriad Genetics at our best.

All the best,

Paul Diaz
President and CEO
Myriad Genetics, Inc.



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About our Code of Conduct

Why do we have it?

Doing the right thing in today’s business environment is not always easy. Healthcare laws and regulations change and situations involving ethics can be complicated. While our commitment and our responsibilities are clear, sometimes it is difficult to know what to do in certain situations. That is why we periodically revise our Code of Conduct and provide you with resources to help you understand our standards and expectations, to help you exercise sound judgment and make good choices for the Company, for our patients, for our customers, and for yourself. Even as we update the Code of Conduct, it is important to note that this Code cannot and does not explicitly cover all conceivable situations or circumstances that employees face.

Myriad is committed to the highest standards of legal and ethical conduct. You are responsible for helping Myriad maintain its good reputation and the trust and confidence of its patients, customers, payers, employees, stockholders, and the public.

The Code is intended to provide you with a clear understanding of the principles of business conduct and ethics that are expected of you and to aid you in making ethical and legal decisions when conducting the Company’s business and performing day-to-day duties.

Who does it apply to?

This Code applies to Myriad Genetics, Inc. and all its subsidiary organizations. All employees, temporary employees, contracted employees, interns, students, agents, etc, leadership, and Board members should read and follow the code.

Compliance with the Code is a condition of your employment or qualification to contract with Myriad in any capacity.

Q: Why does Myriad have a Code of Conduct?

A: Because it’s the right thing to do! In its Compliance Program Guidance for Clinical Laboratories, the Department of Health and Human Services’ Office of Inspector General (OIG), lays out the seven elements of an effective compliance program. First among these, the OIG states that labs should develop and disseminate standards of conduct for all employees that describe its policies about fraud, waste and abuse, adherence to all applicable laws, and the commitment to follow the program requirements of federal, state, and private health plans.

How to use it?

- Know your responsibilities as employees and managers
- Read the Code and familiarize yourself with its standards
- Know the resources available to you when you have questions or concerns
- Understand how to use the Front Page Test on page 36

Getting more information

If you have questions about how these requirements apply to you, there are several policies and people in the organization that can give you more information:

Corporate compliance and privacy department can offer advice on the Code, compliance policies, how we comply with the laws, regulations, and industry standards

Managers and senior leadership can offer advice on how the Code pertains to your particular role at Myriad

Legal department can offer advice on how Myriad can conduct its business in compliance with the law, contracts, intellectual property and anti-trust laws

Human resources can help explain and answer questions related to benefits, employment and workplace issues



Our responsibilities

As employees, officers and directors

We are committed to understand and follow the principles set forth in this Code. In addition, we must:

- follow all laws, regulations, policies and procedures that apply to our jobs;
- conduct business according to the highest ethical and legal standards;
- report concerns and known or suspected misconduct immediately.

As executives and managers

Supervisors have additional responsibilities, including:

- acting as role models, holding ourselves to the highest standards of ethical business conduct;
- reinforcing our Code by regular communications to our employees emphasizing the importance of ethics and compliance;
- creating a positive work environment where employees are comfortable raising questions and concerns;
- monitoring employees' business conduct to ensure compliance with our Code;
- immediately reporting any known or suspected ethical or legal misconduct and never retaliating or ignoring acts of retaliation against others.



Reporting concerns

It is a condition of your employment to report violations of the Code or laws to your supervisor or manager, the Chief Compliance Officer, or to the Compliance Hotline.

Q: What type of issues would I need to report as an employee?

A: Any compliance concerns and issues regarding federal, state, or local laws and regulations, as well as Myriad policies.

Q: How do you report a concern?

A: You can report any concerns to your supervisor, department head, Compliance Officer or Legal Department.

Q: Where can I go to report a suspected compliance issue?

A: You can report any concerns by going to the Myriad Corporate Compliance & Privacy page and clicking on the Compliance Hotline.

How do you report a concern?

You may report a concern to your direct supervisor or to another manager you feel comfortable with. You may also report to a member of the Corporate Compliance & Privacy Department up to and including the Chief Compliance Officer, a member of the Legal Department or the Human Resources Department.

Department	Contact Information
Compliance	Compliance@myriad.com
Privacy	Privacy@myriad.com
Legal	Reach out to the lawyer responsible for your Business Unit.
HR	Humanresources@myriad.com
Compliance Hotline	MyriadHotline.com

Q: What if I don't feel comfortable about reporting an issue?

A: You can report any issues anonymously by going to the Compliance Hotline link on the Corporate Compliance & Privacy SharePoint page

Making an anonymous report

You can submit an anonymous concern by going to the Myriad Corporate Compliance & Privacy page (MyriadHotline.com) and clicking on the Compliance Hotline. If you choose 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.

Note: Some countries limit or even prohibit anonymous reporting. For further guidance, please contact the International Compliance Officer.



Anti-retaliation policy

Myriad prohibits retaliation against individuals who make a good faith report of known or suspected legal or ethical misconduct. A “good faith” report means that you have provided all of the information you know and you genuinely believe it to be true.

In addition, Myriad prohibits retaliation against anyone who participates in investigations. When requested, all of us are required to assist and actively participate in internal investigations.

Retaliatory acts will subject the retaliator to disciplinary action up to and including termination. If you believe you have experienced retaliation, you should report it immediately.

Consequences for Code violations

Violations of our Code may carry serious consequences including disciplinary action up to and including terminations. 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.





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 & Privacy or Legal Departments. There are various laws and guidelines that apply to our business including, but not limited to:

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

Dealing fairly with others

Fair competition

We want those with whom we do business to view our business practices as reliable, honest and trustworthy. We want to outperform our competition fairly and with integrity. We will succeed based on the quality and value of our products and not by illegal or otherwise improper business practices. Competition laws, also known as ‘antitrust’ laws, generally prohibit agreements with competitors, suppliers or customers that could unfairly limit free and open competition.

Myriad will not unfairly discriminate in prices offered to various customers, set unfair prices below cost or make false statements about competitors. We will be cautious when interacting with competitors. Even the appearance of cooperating with competitors can damage our reputation and legal standing. We will not work with competitors to fix prices, rig bids, allocate markets amongst us, boycott certain organizations or make non-competitive agreements.



Anti-trust policy

Myriad’s policy is to comply fully with the US antitrust and international competition laws. Myriad believes that free competition is fundamental to the free enterprise system. In short, all companies should compete individually rather than joining together in agreements that restrict competition. Failure to follow these laws may lead to you and the company receiving serious fines and criminal penalties.

- 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.”
- Participation in trade associations:** 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 leave.



Protecting shareholder assets

Appropriate use and management of Myriad’s assets – such as equipment, supplies, funds, records, information and, most important, reputation – 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 books and records

Accuracy in recordkeeping is essential to maintaining the trust of our patients, stockholders, customers and business partners. This is a responsibility we all share. In every transaction, comply with our internal systems, controls and procedures to ensure compliance with the law and the proper management of our records. If you are involved in any aspect of our accounting or financial reporting processes, make sure our records accurately and honestly reflect all transactions. 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 timeframes. 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.

Safeguarding 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.

What is considered confidential information:

Confidential information includes any information, whether or not marked “confidential,” which has not been made public either outside or within Myriad and which might be useful or helpful to competitors, investors, financial analysts or others who are interested in Myriad.

Examples of confidential information include:

- computer records

financial data

planned new products or product improvements

advertising or marketing programs

expansion or contraction plans

lists of suppliers or customers

lists of employees

wage and salary data

personnel files or data

capital investment plans

projected revenues
- earnings and changes in management

levels of staffing

manufacturing techniques

patents

patent applications

trade secrets

sales data

significant projects

business strategies

policies of Myriad

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

Proprietary and confidential information:

In carrying out Myriad’s business, we do so with integrity. That’s especially important when during the normal course of business you may become aware of confidential or proprietary information about the Company, our customers/suppliers, prospective customers/suppliers or other third parties.

Confidential or proprietary information includes any nonpublic information concerning our Company that might be of use to competitors or harmful to Myriad or our customers or suppliers if disclosed.

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.

Nothing contained in this Code shall be construed as limiting any employee 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.



Patient privacy

We respect the privacy of our patients, prospective patients and former patients and have taken steps to safeguard personal and confidential information that we are required to obtain for business or legal purposes. Access to personal patient information, such as personal information 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 memos, notebooks, computer disks, 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
- protecting mobile devices from theft

Employee privacy

We respect the privacy of our employees and former employees. Access to personal employee information, 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 does reserve the right to inspect our facilities and property, in compliance with local laws and policies, such as computers, telephone records, lockers, emails, files, business documents and workplaces. You should not expect privacy when using Company-provided equipment.

Q: What is Patient Information?

A: Personal, protected patient information is any data that can be used to identify a specific individual, including name, date of birth, medical record number, U.S. Social Security Number or other government identification number, or personal identifiers.

Use of company computers, e-mail and the internet

Myriad maintains a wide range of electronic devices and networks for us to work as effectively as possible 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 judgement and should not expect privacy to be guaranteed except where mandated by law.

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.

Inside information / insider trading

Myriad expressly forbids any employee from trading on material non-public information or communicating material non-public information to others in violation of the law. This conduct is frequently referred to as “insider trading.” This policy applies to every employee of the Company and extends to activities both within and outside their duties to the company, including trading for a personal account.

The concept of who is an “insider” is broad. It includes officers, directors 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 he or she enters into a special confidential relationship in the conduct of a 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 our Company has a contractual or other relationship.

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.



Conflict of interest

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 debate about Myriad stock. 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 Departments.



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 the fact and the 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 your 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 employments 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 Committee’s Conflict of Interest Sub-Committee. Members include HR, Legal and Compliance.

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

A: A “conflict of interest” is a situation where, through our relationship with Myriad, we may be in a position to influence 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.

Financial interests

We 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 exceptions must be reviewed by the Chief Compliance Officer 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

Business opportunities you learn about as a result of employment with Myriad belong to Myriad, if within the scope of Myriad’s existing or contemplated business, and should not be taken advantage of for personal gain unless prior written approval is received from the Corporate Compliance Committee’s Conflict of Interest Sub-Committee.

Related party transactions

Related parties are those who do not deal with you at arm’s length, e.g., family members, friends or organizations with which you have a close relationship. You may not conduct Myriad business with related parties without the prior written consent of the Corporate Compliance Committee’s Conflict of Interest Sub-Committee.



Gifts, hospitality and payments

Receiving gifts: Gifts, favors, entertainment or other inducements may not be accepted by employees or members of their immediate families from any person or organization that does or seeks to do business with, or is a competitor of Myriad, except as common courtesies usually associated with customary business practices. If the gift is of more than a reasonable, industry-norm value, the Compliance Committee must approve its acceptance (or retention if disclosure is made after a gift is received). Gifts may never be accepted from referral sources such as HCPs.

An especially strict standard applies when suppliers are involved. If a gift unduly influences or makes an associate feel obligated to “pay back” the other party with business, receipt of the gift is unacceptable. It is never acceptable to accept a gift in cash or cash equivalent. Even cash gifts of token value must be declined and returned to the sender.

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 limitations). Please refer to these sections to ensure compliance. However, there are certain principles that apply across the board. For example, cash or cash equivalents (i.e., an item which is easily convertible to cash), gifts that are actually bribes to win business or gain favorable treatment, and gifts that are excessive in value are never permitted.



Fostering a positive work environment

Myriad is committed to maintaining a work environment where we feel comfortable, valued and safe, no matter where we are in our global organization.

Non-discrimination / non-harassment

Each of us is responsible for creating a culture of trust and respect that promotes a positive work environment. This means treating one another with fairness and courtesy in all our interactions in the workplace. 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, or National Origin. Nor will there be discrimination against persons because they are veterans of the Vietnam era, Armed Forces Service Medal veterans, or other protected veterans. Similarly, considering the need for reasonable accommodations to their limitations, this facility will not discriminate against the qualified disabled, including disabled veterans and special disabled veterans. Employees and applicants are encouraged to self-identify themselves in confidence to the EEO Coordinator. For more information, contact your local Human Resource Department or reference the Employee Manual.

Safe workplace practices

Our company strives to provide a safe and healthy workplace for employees, customers and visitors to its premises. All managers have 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.

Around the world

Conducting business with respect for local conditions

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 standards 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. We must also maintain accurate books and records and a system of internal controls.

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.

Also, 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 always act in a manner that supports our core values and ethical culture and we hold our suppliers to these same standards. One of the precautions we take is to ensure that our suppliers also behave legally and ethically and do not engage in human trafficking or slavery to help eliminate forced labor and human trafficking in our supply chain.

Our interactions

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.

Q: Why are interactions with HCPs so closely monitored?

A: Due to numerous cases of fraud, waste, and abuse over many decades, federal and state governments have passed multiple laws that tightly control what forms of compensation and relationships healthcare entities may form with professionals. The aim of these laws is to forbid improper forms of payments to these professionals used to induce them to purchase items or services based on personal gain instead of the best interests of patients.

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

Interactions with HCPs are highly regulated. All our engagements with HCPs are transparent and appropriate. We believe in building relationships with our customers by providing industry leading quality, innovation and service, not by offering bribes or other improper inducements. We do not engage in any conduct that is intended to, or has the appearance of, improperly influencing a HCPs judgment.

We follow all federal and state laws that 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 Stark regulations impose detailed requirements governing how we may enter into and manage contracts with physicians and may prohibit various payments to physicians even if the payments are made for the proper purpose.

Always be careful in any situation where we are providing, buying or selling anything other than diagnostic information services to or from an actual or potential customer. Review the applicable Compliance policies and contact the Corporate Compliance & Privacy or Legal Departments for guidance if you have any questions.

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.



Federal and state laws and our policies forbid us from giving gifts, or providing entertainment to HCPs in the United States. Make sure you know and comply with our policies.

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

Modest business meals are permissible 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 would not exceed the annual dollar limits provided in our Compliance Guide on Interactions with U.S. Healthcare Professionals or local meal guidelines for countries outside of the U.S.

Q: Are field personnel authorized to create or sign agreements or contracts with HCPs?

A: No. All agreements that would bind Myriad to legally enforceable obligations, including specimen processing agreements, exclusive testing agreements, business associate agreements and speaker/consultant agreements should go through the Legal Department.

Q: What is the Stark Law?

A: The Federal Stark Law prohibits referring health services to an entity in which the physician (or a member of the physician’s family) has an ownership / investment / financial interest or arrangement (certain exceptions apply). The Stark Law further prohibits Myriad from submitting claims for reimbursement or payment that result from these referrals. All interactions with HCPs, even if permitted under the Stark Law, must not violate the Anti-Kickback Statute. Many states have enacted laws similar to the Stark Law, and these laws also govern our interactions in those states.

Interactions with government officials

It is Myriad’s policy that in all business dealings Myriad will strictly observe 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 information, or information from competitors, whether orally or in writing, where 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. You should consult with the Chief Compliance Officer to be certain that you are aware of any such rules and you must have approval before providing anything of value to a government employee. Myriad prohibits the payment of bribes to government employees. This prohibition includes political parties and 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.

Q: What international laws could apply to our business?

A: Foreign Corrupt Practices Act (FCPA), UK Bribery Act (UKBA), and local anti-corruption laws.

Q: What is the Anti-Kickback Statute?

A: The Federal Anti-Kickback Statute prohibits knowingly and willfully offering, paying, soliciting, or receiving anything of value to induce or reward referrals or to generate business. Many states have enacted similar anti-kickback statutes, and these laws also govern our interactions in those states.

Q: What is the False Claims Act?

A: The Federal False Claims Act prohibits (i) presenting a claim for payment to the Government that you know to be false; (ii) concealing, avoiding, or decreasing an obligation to pay the Government; and/or (iii) falsifying records in support of such a claim or obligation to the Government. Many states have enacted laws similar to the Federal False Claims Act, and these laws also govern our interactions in those states.

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 health care 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 these may include technology or software providers, companies from whom we may purchase products or services that will help us implement a new initiative or improve existing processes, 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.



Supporting our communities and the public

The communities in which we operate provide a strong workforce, useful resources and respectful neighbors. In return, we must show that we are a responsible corporate citizen. This means that we should respect and protect the environment from adverse impacts as a result of our operation.

Environmental impact and social responsibility

At Myriad, corporate responsibility plays an important role in our approach to discovering and delivering valuable, transformative diagnostic tests across all major diseases to improve patients’ lives. We believe that our corporate social responsibility programs:

- 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 spent and conscientiously applied, and are not granted as a means to curry favor with referral sources or for other improper purposes.



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, for you 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 (iii) use Myriad time for any political purpose. The political process has become highly regulated, and if you have any questions about what is or is not proper, you should consult with the Government Affairs Department or the Chief Compliance Officer before 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.



Government investigations

To make sure we respond appropriately, promptly contact the Corporate Compliance & Privacy 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 & Privacy 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.





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

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.
 - ☐ 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 & Privacy 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.

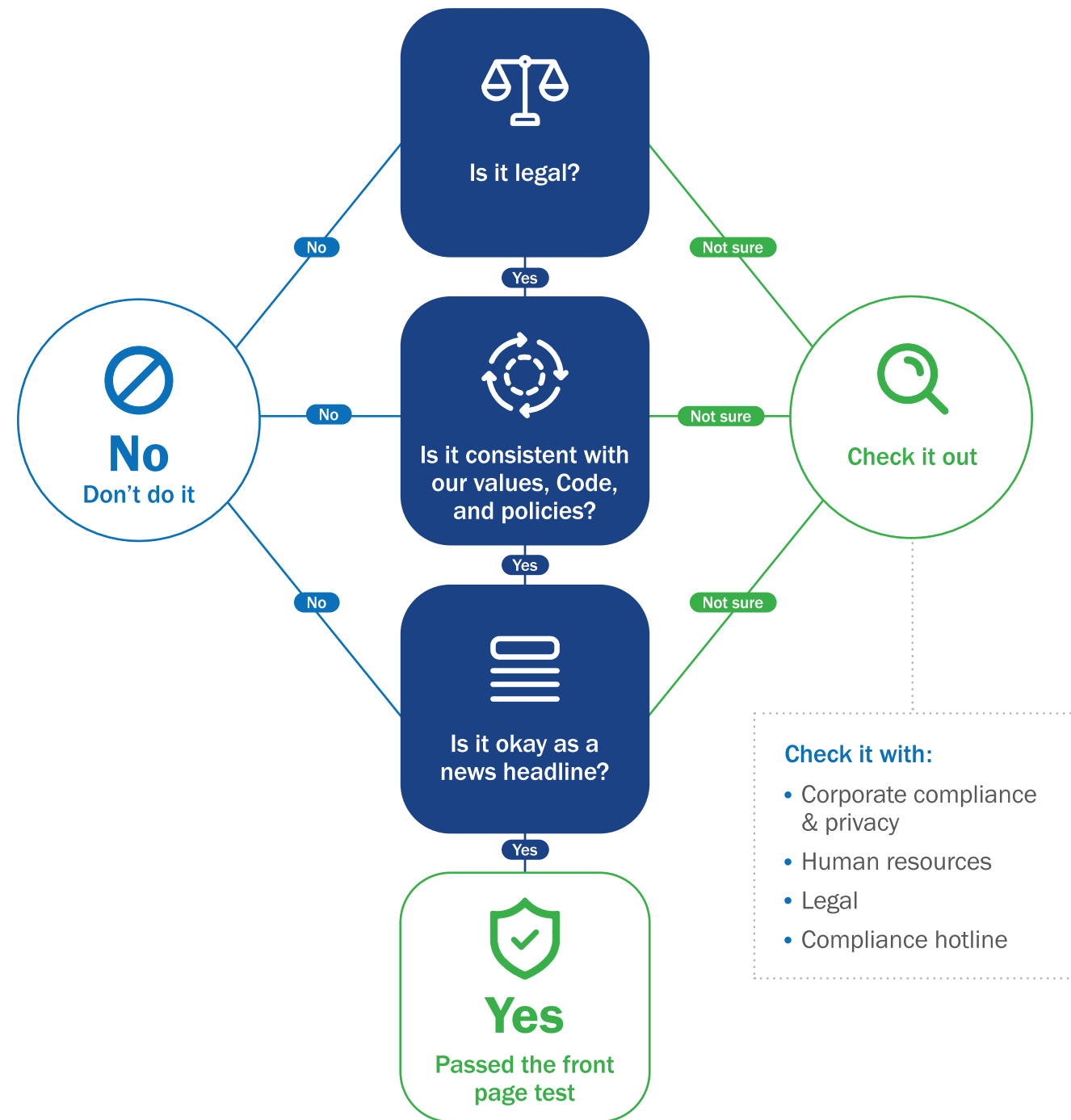
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Date

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Notes

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Myriad Corporate Compliance & Privacy

Compliance@Myriad.com