



**BILLION  
TO ONE**

# Code of Conduct

2023

## A Message from Our CEO

At BillionToOne, we all work together to serve patients by providing powerful and quantitative molecular diagnostics that revolutionize disease detection and remove the fear of the unknown. We do this by challenging the status quo that makes healthcare expensive, opaque and out of reach for many patients. We realize that each and every one of our tests provides crucial, life-altering results for patients. We recognize the gravity of our work and how it can often be a matter of life or death. Therefore, we work towards our vision of transforming molecular diagnostics by placing patients at the forefront of everything we do.

To achieve this vision, we must all commit to a work environment where all team members can excel. We strive for a high-performance culture, one in which everyone can learn from each other, and everyone, regardless of background or level or position, feels empowered to solve significant problems and make a tremendous impact. We strive for a culture in which everyone feels respected and appreciated and where we unlock the talents of our brilliant and diverse team to achieve amazing results.

When we were starting out on this path early on, when all was uncertain, we set our benchmark as being a good company. We determined that being a good company in and of itself was a worthy goal.



The success was working alongside brilliant, kind, passionate and dedicated colleagues, in an empowering environment, toward a global vision, striving for a future in which transformative molecular diagnostics can help millions of patients. That same benchmark stays true to this day.

This Code of Conduct for BillionToOne (“Code”) supports our commitment to that benchmark and commitment to our patients through unparalleled performance. It provides the principles that help us select the right path when faced with decisions and promote a culture in which the right things are consistently done in the right way. It helps us create an environment where all BillionToOne team members demonstrate our company values and standards in all that we do.

I ask each team member to review this Code of Conduct carefully, abide by it, and seek guidance if you are ever unsure of the best course of action.

Through our shared commitment, I am confident we will continue to achieve our goal of making a difference in the lives of our patients.

**Oguzhan Atay**

Chief Executive Officer

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# Introduction

## **Patient-Centered**

BillionToOne places patients at the forefront of everything we do.



## Purpose

BillionToOne aims to make a meaningful difference in the lives of our Team Members and the patients we serve. To do so, we strive for excellence in all areas of our business operations. Our goal is to be recognized as an organization with sustained success, constant innovation, and responsible business practices.

Our commitment to the highest standards of ethics and compliance is characterized by the decisions we make every day. Our Code helps us make good decisions by providing the ethical guidelines for how to conduct business at BillionToOne.

This Code establishes business practices that are not only essential to how we achieve success but also how we define our company. While our Code sets forth requirements to promote compliance with many of the laws impacting our industry, it is not intended to cover every situation we may encounter. We must use good judgment and speak up whenever we have questions or concerns.

## Scope

This Code applies to all BillionToOne employees as well as our directors, contractors, consultants, business partners, vendors, and third-party agents. In this Code, we use the term “Team Members” to refer to all employees and applicable directors, contractors, consultants, business partners, vendors, and third-party agents.

Employees responsible for engaging third-party Team Members must ensure that they are aware of the Code and our expectation that they act in accordance with the Code.

If you are unsure whether you are covered by our Code, contact your manager, People Operations, the Legal Department or your contact at BillionToOne (for non-employees).

# Our Mission, Vision, and Values

BillionToOne's Mission, Vision, and Values drive our commitment to maintaining the highest ethical and quality standards for our conduct.

Our team is dedicated to doing the right thing and conducting business in a legal and ethical manner. These principles guide our company, our Code, and provide our Team Members with a foundation to make appropriate decisions in all business activities.

## Mission

We strive to remove the fear of the unknown by providing molecular diagnostics that are accurate, fast, and accessible.

## Vision

We challenge the status quo that makes healthcare expensive, opaque, and out of reach for the majority.

## Values

Core values unite our brilliant and diverse team at BillionToOne. The consistent demonstration of these values helps bring our vision closer to reality.

**Patient-  
Centered**

**Kindly Inquisitive  
& Collaborative**

**Creative &  
Innovative**

**Rational &  
Deliberate**

**Profoundly  
Impactful**

## Culture of Compliance

### Our culture reflects the consistent application of our values.

At BillionToOne, we know that a culture of compliance leads to better outcomes for our company and for patients. As part of our commitment to compliance, all Team Members are expected to adhere to the values and standards established in our Code, company policies and procedures, as well as relevant laws and regulations.

We have implemented a comprehensive compliance program to help ensure our operations and activities are conducted in compliance with relevant laws and regulations and to foster an environment of ethics and integrity. Refer to [Our Compliance Program](#) for more details about the compliance program.



# Our People

## **Kindly Inquisitive & Collaborative**

BillionToOne values an environment where employees are empowered to explore new ideas and work together constructively despite our differences.







### General Standards of Conduct

**We expect Team Members to perform their jobs ethically.**

The Code is built on BillionToOne's values, which drives our workplace behavior. This section of the Code describes the minimum behavioral requirements expected of us when engaging with other BillionToOne Team Members. While this section outlines general expectations, we may seek additional guidance on specific behaviors and business practices.

### Respect, Diversity, and Equal Opportunity

**We value diversity and are committed to the principles of equal opportunity.**

Our diversity is one of our greatest strengths. We do our best work in an atmosphere promoting mutual respect, cooperation, and inclusion.

BillionToOne provides equal opportunity and fair treatment to all Team Members throughout all phases of their career progression regardless of race, color, religion, gender, national origin, sexual orientation, gender identity, marital status, pregnancy, age, medical condition, disability, or any characteristic protected by applicable law. We make workplace decisions based on people's qualifications, experience, and suitability for the role.

### Harassment-Free Workplace

**We never tolerate harassment of any kind.**

We are all responsible for contributing to a positive, constructive, and ethical work environment free from harassment. Harassment involves any unwelcome verbal, visual, physical, or other conduct that creates an intimidating, offensive, or hostile work environment. We do not tolerate harassment of our Team Members.

## Conflicts of Interest

### We act in the best interest of BillionToOne.

BillionToOne encourages our Team Members to be active in the community outside of the workplace and respects our Team Members time outside of work. At times, our actions may appear to others to create a conflict between what is best for the company and what is best for the Team Member. As Team Members, we should avoid situations that present perceived or actual conflicts of interests between ourselves and the company. A conflict of interest may involve:

- External professional opportunities or employment
- Selecting third-party suppliers or vendors
- Personnel decisions such as hiring of a close family member
- Financial interests
- Participating in non-business activities to the detriment of performing company duties
- Other activities where a Team Member's interests may not align with those of the company

We must not abuse or misuse our position for personal benefit. We should never allow outside activities, interests, or relationships to conflict with our responsibilities at BillionToOne.

We expect all Team Members to disclose any potential conflict of interest to the Head of People Operations, the General Counsel, or the CEO. They will work with your manager to advise you of any steps or controls to mitigate the potential conflict.

## Workplace Safety/Violence

### We maintain a safe and violence-free workplace.

BillionToOne is committed to providing a safe and healthy workplace, and we are all responsible for our own safety and the safety of others. BillionToOne expects all Team Members to take an active role in ensuring everyone's safety by complying with all workplace safety rules and procedures, including those issued by the Occupational Safety and Health Administration (OSHA), and California Division of Occupational Safety and Health (Cal OSHA).

We do not tolerate violence or any threats of violence and prohibit the possession of weapons of any kind on company property or while off-site conducting company business.

We expect our Team Members to promptly report any threats to workplace safety to their manager or People Operations. The company addresses all allegations or incidents of workplace violence and safety issues in a timely manner.

## Business Partners and the Code

### We expect our business partners to share our commitment to ethics and compliance.

BillionToOne's third party business partners make significant contributions to our success. To meet our goals of serving patients and ensuring quality, we must only engage qualified and reputable business partners. We expect our business partners to share our ethical standards and commitment to compliance; and we enter agreements with business partners that require them to comply with this Code and our other relevant policies and procedures as well as applicable laws and regulations.

To ensure this, it is our responsibility to conduct appropriate due diligence to ensure our business partners can meet our needs. We select business partners based on the quality of the goods or services they provide and are all responsible for holding our business partners accountable.



# Our Workplace

## **Creative & Innovative**

BillionToOne strives to create a workplace where all Team Members are enabled and encouraged to bring new ideas and new ways of thinking to solve significant problems for the benefit of patients.

## Data Privacy

### We safeguard personal data.

BillionToOne Team Members are expected to preserve data privacy by protecting the private personal information of those we work with, including other Team Members, patients, customers, vendors, and other business partners. Personal information is information that can directly or indirectly identify an individual, such as a name, address, demographic information or health information.

We only collect and retain the minimum amount of personal information needed to conduct the applicable business activities. Only Team Members who have a legitimate need to access others' personal data should do so. If any of us becomes aware of a violation of our data privacy standards, we are required to immediately disclose the violation to our manager, People Operations, or the Legal Department.

Additional company policies and requirements apply to patients' personal information. Refer to [Maintaining Patient Trust](#) for more information.

## Asset Protection and Confidentiality

### We ensure confidentiality of our company proprietary information.

BillionToOne provides its Team Members with access to various company assets throughout the course of their employment/engagement. Company assets (both physical and intellectual property) may include equipment, services, records, ideas, and proprietary or sensitive information.

All company assets should primarily be used for the advancement of the company and any personal use of such assets should be limited. BillionToOne reserves the right to monitor and routinely check all company property assets to ensure that they are being utilized in a way that is consistent with our Code. The misuse of any company asset must be immediately disclosed to your manager, People Operations, or the Legal Department.

## Record Keeping

### We maintain accurate records.

BillionToOne is committed to complete and accurate books and records in compliance with our procedures, applicable laws and regulations, as well as accepted accounting standards. We ensure the integrity of our financial records by establishing and following internal processes, controls, and accounting principles. Accurate financial and business records are critical for managing our business, maintaining investor confidence, complying with legal and regulatory requirements, as well as satisfying obligations to our customers and business partners. Therefore, our financial records must always be complete, accurate, timely, and fully disclose the true nature of the business transaction.

It is our responsibility to promptly report any omission, inaccuracy, false entry, or any other departure from these standards. BillionToOne's records must also be maintained in compliance with applicable laws and regulations (e.g., regulatory filings, tax filings, employment and contractual obligations) and, when appropriate, disposed of in accordance with our record retention schedule.

## Insider Trading

### We never use or share non-public information for investment decisions.

As BillionToOne Team Members, we maintain the confidentiality of non-public information and refrain from distributing or disclosing such information to third parties, including friends, family members, or potential investors. It is illegal to trade securities (e.g., stocks, bonds, options, etc.) of a public company when aware of material, non-public information. Non-public information is any information that has not been released to the public (for example, through press releases or public filings). Information is "material" if a reasonable investor would consider it important in deciding whether or not to buy, sell, or hold securities.

BillionToOne abides by all applicable insider trading laws and regulations in the jurisdictions in which we do business.

## Media and Investor Relations

### We are committed to truthful communications to the media and our shareholders.

BillionToOne manages its communications with all media outlets and investor stakeholders carefully and responsibly to preserve our company's reputation and protect the company from violating securities laws. Only authorized BillionToOne Team Members may issue public statements on behalf of the company and only after approval through our communications policies.

## Social Media

### We use social media responsibly.

As BillionToOne Team Members, we use social media respectfully, appropriately and responsibly. Team Members should never disclose confidential information on social media or post self-made promotional content about the company business or products. Team Members may re-post company posts along with a note that is in line with our values. Information about our business endeavors should be on a professional site (e.g., LinkedIn). Only authorized Team Members may post information on the internet or social media platforms on behalf of the company, and all company social media content must adhere to the company's policies and procedures for review of promotional materials.

# Our Industry

## **Rational & Deliberate**

BillionToOne expects all Team Members to make business decisions with thought and purpose. The choices we make should be guided by the best interests of the company, our patients, and the highest ethical standards.





## Compliance with Laws and Regulations

### We abide by all applicable laws and regulations.

BillionToOne is committed to complying with all laws and regulations applicable to our business activities, especially those designed to protect patients and improve the quality of healthcare services.

The laws and regulations governing our company cover a wide range of business activities, such as clinical research, product marketing, product reimbursement, billing, securities, fair competition, privacy, labor and employment, and environmental protection. While Team Members are not expected to know the details of every law or regulation, we should remain aware of the core requirements established in this Code and understand when to seek advice.

Each of us is expected to be familiar with the company policies and procedures relevant to the area in which we work. When appropriate, our company provides training and education relevant to the laws and regulations governing our Team Members. Situations may arise in which the laws and regulations are not clear. In these cases, Team Members are expected to contact their manager, People Operations, or the Legal Department for additional guidance.



### Clinical Laboratory Improvement Amendment (CLIA)

**We conduct our laboratory tests using the highest standards for quality and safety.**

As a provider of diagnostic tests, BillionToOne is certified under the Clinical Laboratory Improvement Amendments of 1988 (CLIA). CLIA regulations are designed to set quality standards for laboratory testing on human specimens for the purpose of diagnosis, prevention, or treatment of disease, or assessment of health.

To meet our obligations under CLIA and protect the quality of our diagnostic tests, the company is required to:

- Only perform tests with written authorization from an authorized healthcare professional
- Only release lab results to the appropriate individual(s)

Federal and/or state officials may perform inspections of our laboratories, and we fully cooperate with these inspections by providing access to all requested facilities, equipment, materials, records, and information.

### US False Claims Act (FCA)

**We make accurate requests for payment.**

BillionToOne does not permit improper billing and follows applicable policies and procedures designed to prevent, detect, and correct the submission of any inaccurate claim for reimbursement. The federal False Claims Act (FCA) is a law that is used to prosecute companies and individuals for submitting a false claim to a federal payer, such as Medicare or Medicaid, for reimbursement. "False claims" may include:

- Knowingly submitting inaccurate claims for services
- Making a false statement regarding a claim for payment
- Billing for the same items or services more than once
- Billing for services not performed or completed
- Submitting claims related to other violations of laws or rules, such as the anti-kickback laws

The FCA authorizes individuals, known as whistleblowers, to bring lawsuits on behalf of the government and to share in the proceeds of successful settlements. Whistleblowers are protected from discharge, retaliation, demotion, or harassment from their employers under the whistleblower protection provisions of the FCA.





## Health Insurance Portability and Accountability Act (HIPAA)

**We respect our patients' information and privacy.**

The Health Insurance Portability and Accountability Act (HIPAA) creates standards for the protection, use, and disclosure of protected health information (PHI). PHI may include:

- Name
- Address
- Email
- Date of birth
- Phone number
- Social Security Number
- Any other information or data combination that may be used to identify an individual.

HIPAA requires that we have in place appropriate safeguards to protect the privacy of PHI and sets restrictions on the uses and disclosures of such information without an individual's authorization and consent.

We all must respect patient privacy and maintain the confidentiality of patient PHI at all times. In addition, to HIPAA, we may also be subject to the privacy laws of other countries. Therefore, you must read, understand and abide by the company's patient privacy policies and procedures.

## Transparency Laws

**We conduct business transparently and fairly.**

BillionToOne may be required to track and report transfers of value provided to healthcare professionals and healthcare organizations. In the U.S., the federal Sunshine Act, as well as additional state-specific disclosure laws, require reporting transfers of value; and the Physician Self-Referral Law (commonly known as the Stark Law) limits the amount of certain transfers of value may be given to another provider.

If you are unsure whether a transfer of value provided is deemed reportable, please reach out to the Legal Department for further guidance.

## Bribery and Corruption

**We do not conduct business through bribery or corruption.**

BillionToOne prohibits all forms of bribery and corruption. Our Team Members are prohibited from offering, giving, receiving or facilitating any bribe or other payment intended to affect our ability to act in the best interests of the company. Our Team Members are prohibited from offering, giving, or facilitating any form of bribe.

A bribe is any money, fee, commission, credit, gift, gratuity, transfer of value or compensation of any kind that is provided in an effort to reward, directly or indirectly, or obtain favorable treatment in a business transaction. A bribe is just one form of corruption. Corruption refers to dishonest or illegal behavior in general, especially by those in a position of power (e.g., politicians and government officials).

If a Team Member is presented with an offer or demand for a bribe or are in a situation where you are unsure whether a gift may be acceptable, contact your manager or the Legal Department.

### **US Federal Anti-Kickback Statute (AKS)**

The AKS prohibits the provision of anything of value in an effort to induce or reward referrals or the generation of business reimbursable by federal health care programs. In addition to exposing the company to sanctions and reputational damage, violation of this statute can be subject to fines and/or criminal prosecution.

To ensure compliance with the Anti-Kickback Statute, we carefully evaluate and properly structure all arrangements with healthcare providers, and avoid any arrangements that could inappropriately influence treatment or purchasing decisions.

### **Civil Monetary Penalty Law (CMP)**

The “beneficiary inducement” provisions under the CMP Law prohibit offering or providing inducements to a Medicare or Medicaid program beneficiary (e.g., a patient) that are likely to influence the beneficiary to order or receive items or services payable by federal healthcare programs from a particular provider, practitioner, or supplier.

### **Foreign Corrupt Practices Act (FCPA)**

Under the FCPA, it is unlawful for a U.S. person or company to bribe any foreign official for the purpose of obtaining or retaining business.

## Gifts and Entertainment

### We never compromise our judgement with gifts and entertainment.

Similar to any business, BillionToOne sometimes offers and accepts business courtesies, such as modest meals, hospitality, gifts, and entertainment. Although business courtesies may be customary in other businesses, more stringent laws and policies apply to our industry.

We must never offer or accept business courtesies to improperly influence a clinical or other business decision. There are significant legal restrictions that apply to offers of gifts or entertainment to healthcare professionals and to government officials and to offers of gifts or other benefits to patients. Before we offer or accept anything, we must make sure it is appropriate (i.e., compliant with laws, regulations, and our policies, and does not influence either party's decision making).

When we do not comply with these rules, our conduct can damage our reputation or harm our business.

## Fair Competition

### We support fair and open competition.

BillionToOne competes fairly and strategically in our industry based on the merits of our people and products and in full compliance with antitrust and fair competition laws. Antitrust and competition laws prohibit agreements or arrangements between BillionToOne and our competitors, customers, or suppliers that aim to coordinate market behavior (e.g., pricing arrangements, terms or conditions of sale, or open competition). We should keep in mind that any such agreement, formal or informal, may have serious legal consequences.

We also only collect and use business information about other companies in a manner that is ethical, lawful, and meets confidentiality obligations, including of former employers of our Team Members. All competitive intelligence activities must be based on honest, transparent approaches. If you find you're in possession of information that may have been obtained in an illegal or unethical manner, please contact the Legal Department.

## Cooperating with Investigations

### We do not obstruct government investigations.

Only certain individuals within our company are authorized to respond to requests for information from government authorities. If responsible for responding to a government request or audit, you must provide honest, truthful, accurate, and complete information without fear of retaliation. Remember, we can never lie, conceal, destroy, or alter documents, make misleading statements, or otherwise interfere with a government inspection, investigation, or requests for information.

For this reason, when contacted by government authorities regarding any non-routine request, we expect all non-authorized Team Members to immediately contact the Legal Department, who will advise on our rights and obligations as a company.





# Our Community

## Profoundly Impactful

BillionToOne seeks to revolutionize the molecular diagnostics industry by empowering patients with timely knowledge.





## Ethical Research

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**We follow all standards of quality and integrity for our research programs.**

BillionToOne's research activities are conducted in alignment with our Code, company policies and procedures, recognized international laws and regulations.

We are committed to protecting the health, rights, and safety of research participants utilizing the highest ethical standards. We fully disclose the purpose and nature of all studies to research participants and respect their rights while engaged in our research activities.

In situations requiring the use of animals to conduct research, it is our responsibility to ensure animals are treated ethically, respectfully, and humanely. We seek to minimize the use of animal testing wherever possible.

We also must maintain the integrity and quality of data from BillionToOne's research activities. BillionToOne believes in transparency in our research by reporting all results, positive or negative, and is committed to protecting the integrity of our research data.

We must always ensure we are providing accurate and complete data to government authorities, healthcare professionals, patients, and the community to generate trust in the reliability of our science.

## Interactions with Healthcare Professionals (HCPs)

### We interact ethically with HCPs.

BillionToOne is committed to ethical and compliant interactions with HCPs based on the strength of our science and transparent communication. We interact with HCPs for sales and marketing, research and development, and other consulting services. All interactions with HCPs must adhere to our Code and company policies and procedures on interactions with HCPs, which are designed to include requirements from applicable laws and industry standards.

### Marketing Interactions

BillionToOne is committed to ethically promoting our products and recognize the importance of providing healthcare professionals with the accurate scientific and medical information they need to make informed decisions.

Although the laws and regulations governing promotional interactions with healthcare professionals vary across localities, we have adopted the following global principles for all promotional and marketing-related interactions:

- We promote our products only for their intended uses
- We make truthful, accurate, balanced, fair, objective, well-supported and complete claims
- We do not provide any items or services to inappropriately influence or induce the use or recommendation of our products

All company communications and materials will adhere to the company's policies and review procedures. In commercial and medical discussions with providers, payors and patients, Team Members must use communications and materials provided by the company.

### Research Interactions

BillionToOne is committed to scientific integrity in all of our research activities and recognize the important role healthcare professionals play in the development of new products. We structure all our research-based interactions with healthcare professionals to maintain the independence and integrity of the research conducted. Our relationships with HCPs conducting research related to our products may not inappropriately influence the design or results of research activities.

### Other Healthcare Professional Consultant Interactions

BillionToOne is committed to only engaging healthcare professionals for consultant services where there is a clearly defined need and legitimate purpose and scope. We pay healthcare professionals the fair market value of consulting services provided. Consultant interactions and payments are never used to influence or induce the use or recommendation of our products.



## Maintaining Patient Trust

### We act in the best interest of our patients.

BillionToOne interacts with patients to deliver test results, manage billing and payment obligations, conduct research, support patient advocacy groups, and improve disease and product awareness. When interacting with patients, we must always keep their best interest at the forefront. We always act transparently and responsibly in our patient interactions.

All activities with patients must adhere to our Code and company policies and procedures, which reflect applicable laws and industry codes focusing on patient interactions.

### Communications with Patients

BillionToOne is committed to ensuring our communications with patients focus on providing the information they need to make informed, personal medical decisions. Our communications with patients must be tailored as appropriate for the audience.

### Patient Organizations

BillionToOne interacts with patient organizations to improve patient care by advancing education and awareness. All interactions with patient organizations should be consistent with the mission of the patient organization. If we provide financial support to patient organizations, such support must be consistent with our Code and with applicable company policies and procedures and must be properly disclosed in relevant public channels.

### Privacy of Patient Information

BillionToOne respects the privacy of every patient. During the course of our business activities, we may come into contact with or obtain patient personal information. We comply with applicable patient privacy laws, which among other things, may require patient consent before patient information may be used for business activities. In instances where patient information may be used by the company, we are obligated to securely collect and protect personal information to prevent data security breaches. For further information on patient privacy requirements or to report any potential misuse or loss of patient personal information, please contact the Legal Department.

## Interactions with Payers

### We advocate for coverage based on clinical and economic evidence.

BillionToOne engages with payers to further the company's goal of improving patient health through accessibility to our diagnostic tests. While interacting with payers, we may share information about our tests, discuss disease states and therapeutic areas, negotiate contractual arrangements, and review healthcare economic information.

When advocating for coverage and reimbursement, we generate support based on the strength and weight of applicable clinical and economic evidence, always acting in the best interest of the patient. We must never seek to inappropriately influence or reward payers financially for covering our tests. All arrangements with payers, including the provision of any discounts, must be appropriately documented and reported to the government, where required, and must comply with all applicable company policies.

## Manufacturing, Quality, and Supply Chain

**We confirm our products reflect our commitment to quality.**

BillionToOne recognizes that patients rely on our tests to make important decisions about their health. We must maintain their trust by adhering to strict quality control processes and continually monitoring our products to ensure they meet our high standards.

We have a quality assurance (QA) and quality control (QC) program in place, consisting of written standards, training, and continuous improvement activities to document, measure and monitor the effectiveness of laboratory operations. Our quality program strictly adheres to applicable laws, regulations, and industry guidelines, including Clinical Laboratory Improvement Amendments (CLIA) and Good Manufacturing Practice regulations.

We expect our suppliers and business partners to endorse BillionToOne's commitment to quality and we ensure this commitment through consistent oversight and monitoring of third-party business partners' activities.

### Reporting Quality Issues

Reporting quality issues is critical to ensuring the quality and reliability of our tests. We are all responsible for reporting potential quality issues in a timely manner to the Quality Assurance Department.

## Environmental Welfare

**We are committed to sustainable business practices that protect the environment.**

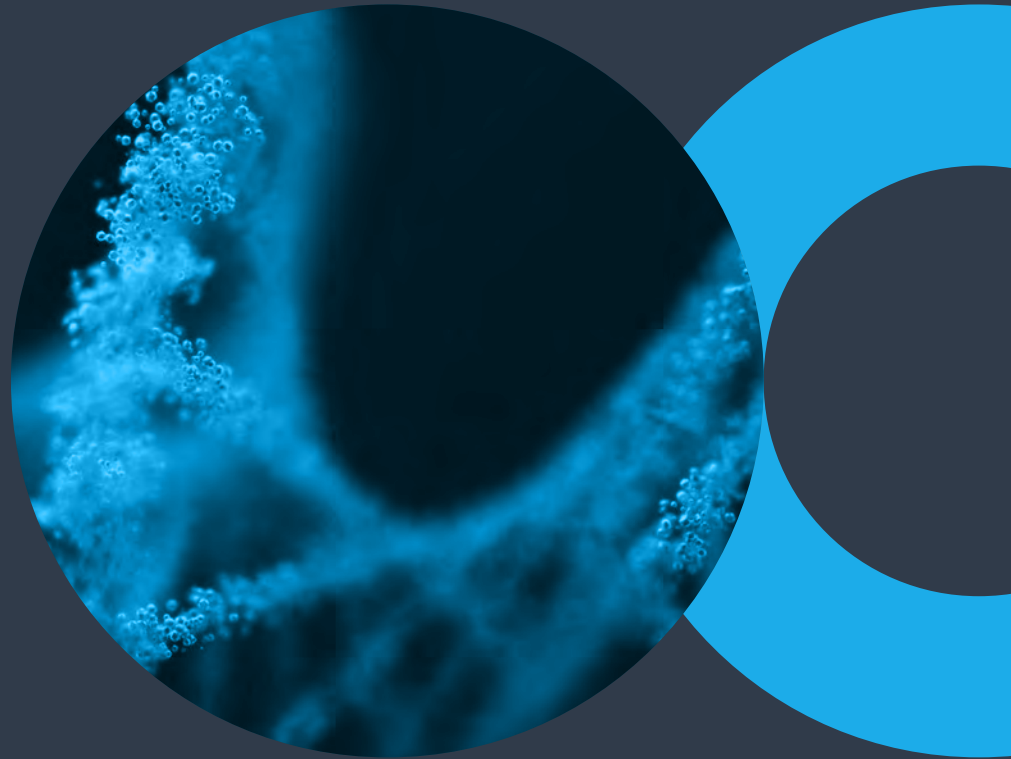
As an active member of our local and broader communities, BillionToOne has a responsibility to consider environmental, social, and governance factors when evaluating our operations. We are committed to developing, producing, and maintaining our products and services in a way that is sustainable and safe for our environment. To support this commitment, we pay close attention to the impact of our operations and implement standards to minimize environmental risks (e.g., conservation of resources, reducing waste and emissions through recycling or other energy conservation measures) to protect the communities in which we live and work.

BillionToOne strives to increase awareness of environmental issues with our Team Members and provide information on what our company can do to help. It is our responsibility to comply with all applicable company policies, environmental laws and regulations, and to take all necessary precautions to avoid any potential environmental incidents.





# Our Compliance Program



## Our Compliance Program

We have implemented a comprehensive compliance program to help ensure our operations and activities are conducted in compliance with relevant laws and regulations and to foster an environment of ethics and integrity. Our compliance program is composed of the following elements:

### 1. Designation of compliance officer and compliance committee:

Our company has designated a Chief Compliance Officer to be responsible for developing, operating, and monitoring the Compliance program. Additionally, the Chief Compliance Officer is charged with providing broad leadership and strategy for how the company integrates compliance requirements within its everyday business activities.

In addition, our company's Compliance Committee is composed of cross-functional senior leadership and is charged with promoting open lines of communication with company leadership and providing oversight of the company's compliance initiatives.

### 2. Written standards, policies, and procedures:

Our company sets written compliance standards for acceptable Team Member behavior and interactions with other Team Members, as well as customers, in this Code as well as in its written compliance policies and procedures.

### 3. Regular communications and training:

Our company regularly communicates and provides education and training for Team Members on our Code and our policies and procedures. We encourage an open-door policy where Team Members feel comfortable asking questions or raising concerns.

### 4. Reporting Concerns:

Our company maintains a confidential reporting helpline that allows the company to receive reports of wrongdoing or misconduct, and that protect the anonymity of Team Members who seek to submit allegations. More broadly, we encourage an open-door policy where Team Members feel comfortable asking questions or raising concerns their manager, People Operations, the Legal Department or other members of management.

### 5. Monitoring and auditing:

Our company regularly conducts audits and monitors its business activities to identify potential areas for improvement and assist in the reduction of any identified risk areas.

### 6. Investigations and Disciplinary actions:

Our company has a process to respond to reports of wrongdoing or misconduct and to enforce appropriate disciplinary action when necessary.

### 7. Corrective actions:

Our company promptly and consistently takes action to uphold compliance requirements. This includes initiation of root cause analysis and implementing preventive measures.

While a comprehensive compliance program serves a critical role in supporting our company's efforts, only the day-to-day action and commitment of our Team Members will result in its effectiveness.

## Speak Up

### Ask Questions.

**If unsure, ask.**

BillionToOne supports an inquisitive and collaborative culture. We recognize that all Team Members are not compliance and legal experts, just as our legal and compliance team members are not scientists or sales and marketing professionals. Many of the laws that impact our business are complicated and it can be difficult to identify the right path. If you are ever unsure of the correct course of action to take, it's always best to ask in advance. We offer multiple resources to answer your questions. Please refer to **Resources** below.

### Anonymous Compliance Helpline

Our Compliance Helpline is hosted by a third party and available 24 hours a day, seven days a week. You may reach our Compliance Helpline by telephone at 1-844-237-8881, online at <http://billiontoone.ethicspoint.com>, or mobile device at [billiontoonemobile.ethicspoint.com](http://billiontoonemobile.ethicspoint.com). We treat any report concerning an actual or perceived violation of health care laws confidentially, and anonymously if requested, to the extent consistent with the law.

For more information, please visit <http://billiontoone.ethicspoint.com>.

### Reporting Possible Violations

**Speak up if you believe you are aware of a possible compliance violation.**

Raising questions and reporting a concern helps us improve and achieve our goals. In addition, when we report a concern, we are protecting our colleagues, customers, business partners and patients, as well as the reputation of BillionToOne. Remember, the company cannot address an issue unless it is brought to the attention of the Team Members who can help address it.

When considering whether to make a report, you do not need to have all of the information handy or have proof of what took place. Instead, you have a responsibility to report any time that you believe that you have information about potential violations of our Code, our company's policies, applicable procedures, regulations, or laws. Failure to report a potential violation that you are aware of may be cause for discipline. Conversely, filing false reports may be cause for discipline as well. If you are ever unsure of the best course of action, report the concern.

At BillionToOne, you have multiple channels to report a concern:

- Your Manager
- People Operations
- Our Chief Compliance Officer
- Our Compliance Helpline
- A member of senior management

The Chief Compliance Officer promptly reviews and investigates all reports of potential non-compliance. As part of these investigations, we seek to maintain the confidentiality of the reporter, unless disclosure is required by law or confidentiality is unavoidable based on the nature of the investigation.



### Disciplinary Guidelines

**Violation of this Code is a disciplinary matter.**

We all must ensure our personal decisions and actions comply with this Code in letter and spirit. If a difficult situation arises, Team Members are expected to seek advice from their manager, People Operations, or the Legal Department before acting.

Violations of our Code, our policies, applicable procedures, regulations or laws, as well as violations of our values, can result in significant disciplinary action, up to and including dismissal or legal proceedings and penalties.

Others involved in the wrongdoing may also be subject to discipline; for example, an individual who fails to use reasonable care to detect a violation, an individual who refuses to cooperate with an investigation, and a manager who approves “looking the other way” or attempts to retaliate.

### Anti-Retaliation

**We do not tolerate retaliation against individuals making good-faith reports.**

BillionToOne seeks to create and promote an open and trusting workplace environment. We value our Team Members and have established company policies and applicable procedures to encourage the reporting of potential illegal, unethical or otherwise noncompliant conduct without fear of retaliation.

Retaliation is any adverse action, such as pay reduction, demotion, termination, intimidation, harassment, or threats against a Team Member. All Team Members, including all managers, are strictly prohibited from engaging in any retaliatory behaviors against another Team Member who reports a concern or assists in a company investigation.

BillionToOne takes claims of retaliation seriously. They will be investigated and, if verified, retaliators will be disciplined up to, and including, termination. If you believe you have been retaliated against, you should contact the Legal Department, or any of the reporting options listed in this Code.

## Resources

The following resources are available when we are unclear about any aspect of this Code or unsure how to respond to an issue not addressed in this Code or other company's policies:

### People Operations Department

[peopleops@billiontoone.com](mailto:peopleops@billiontoone.com)

### General Counsel / Privacy Officer

[compliance@billiontoone.com](mailto:compliance@billiontoone.com)

### BillionToOne, Inc.

1035 O'Brien Drive

Menlo Park, CA 94025

Attn: Legal Department

### 24/7 Corporate Compliance Helpline

- 1-844-237-8881
- Web: <http://billiontoone.ethicspoint.com>
- Mobile: [billiontoonemobile.ethicspoint.com](http://billiontoonemobile.ethicspoint.com)

## Commitment to Compliance

At BillionToOne, we strive for excellence in all areas of our business operations with a goal to be recognized as an organization with sustained success, constant innovation, and ethical and compliant business practices. Our culture of compliance leads to better outcomes for our company and Team Members, as well as for patients, physicians, payers, vendors and other third party business partners.

As part of our commitment to compliance, all Team Members are expected to adhere to the values and standards established in our Code, company policies and procedures, as well as relevant laws and regulations. Our individual commitment is demonstrated by the decisions and actions of each Team Member every day.



Code of Conduct 2023

