

Anti-Bribery and Corruption Policy

Purpose & Scope

The Anti-Bribery and Corruption Policy establishes principles that govern the conduct of Epigenome Technologies and its employees in order to conform to anti-corruption and anti-bribery laws in the United States and the State of California, including, but not limited to, California Penal Code 67PC and 68PC, and 18 U.S.C. § 201.

This policy applies to all employees of Epigenome Technologies.

The Chief Executive Officer is the final authority for this policy.

Policy Statement

Bribery is against the ethical standards of Epigenome Technologies and does not comport with our company values. Bribery is illegal and may expose Epigenome Technologies to fines, penalties, and reputational damage.

Under no circumstances may Epigenome Technologies, or any employee of Epigenome Technologies, seek to influence the decisions or general opinions of any other person by any means considered illegal or harmful to our reputation of integrity and honesty; including but not limited to the payment or receipt of bribes, kickbacks, or illicit commissions.

Definition of Bribery

“Bribery refers to the offering, giving, soliciting, or receiving of any item of value as a means of influencing the actions of an individual holding a public or legal duty. This type of action results in matters that should be handled objectively being handled in a manner best suited to the private interests of the decision maker. As such, bribery constitutes a crime and both the offer or and the recipient can be criminally charged.”¹

It is important to understand that bribery is not limited to the exchange of cash or financial instruments, but also includes political/charitable donations, jobs or internships for family members or friends, and even publication on a socially desirable platform. In addition, it is critical that bribery has occurred even if (a) it was not successful; (b) an offer was made but not carried out; or (c) direction for an offer was made, but no bribe was offered or paid.

Government Officials

Epigenome Technologies and employees of Epigenome Technologies will avoid *the appearance* of corrupt practices when dealing with government officials. Otherwise reasonable accommodations, such as travel reimbursement or dining expenses, might not be allowable when applied to government officials.

¹ <https://www.law.cornell.edu/wex/bribery>





A government official is any:

- Official, employee, appointee, or elected officer of a government
- Official or employee of a state-owned (wholly or partially) corporation
- Political party, official of a political party, or a candidate for political office
- Agent or person acting in an official capacity for any of the above

No employee of Epigenome Technologies shall offer or provide any item of value to any government official without the permission of the appropriate government oversight committee except for travel or dining expenses not exceeding \$250 with prior approval of this policy's final authority.

Reporting violations

If you are offered or solicited for a bribe from a person or entity doing business with the company, report it immediately to the final authority for this policy. Violations can be reported to your direct manager or to a member of the Board of Directors. Whistleblower laws of the United States and the State of California protect employees who report such activity in good faith.

