



Ethics & Whistleblower Policy

Purpose & Application

Illumina is committed to the highest standards of integrity, ethics, and compliance with applicable laws and regulations. All directors, officers, and employees are expected to act with honesty, accountability, and professionalism in the performance of their duties.

This policy provides a safe, confidential, and accessible mechanism for raising concerns about suspected misconduct, wrongdoing, or violations of the Company's Code of Conduct. It ensures that individuals can report concerns without fear of retaliation.

Confidentiality & Anonymity

Confidentiality resides at the heart of our Ethics & Whistleblower Line. We know it's not easy to voice ethical concerns and so we have taken steps to remove any barriers. We have established strict criteria when it comes to privacy and have engaged KMPG, a third-party service provider, to manage this program for us. We have ensured that reports are assigned to designated officials who have no vested interests or bias concerning the individual being reported on.

- Reports may be made confidentially or anonymously through independent third-party resources available 24/7/365.
 - The identity of a whistleblower will be protected to the fullest extent permitted by law, unless disclosure is required by legal authority or the whistleblower consents.
 - All information will be handled sensitively, securely, and shared only on a need-to-know basis to allow for
- The employee Ethics & Whistleblower Line can be accessed via the internet, telephone, or via email:
- Online whistleblower platform: <https://app.alias-solution.com/contact/en/illumina>
 - Phone line: 1-833-467-5376
 - Email Address: illuminaholdingsline@kpmg.ca

Reporting Process

- **Internal Discussion (Optional):** Individuals are encouraged, but not required, to first raise concerns with their direct manager.
- **Alternative Reporting:** If uncomfortable speaking with a manager, or if the response is unsatisfactory, concerns can be submitted directly through one of the whistleblower resources (website, hotline, or email) or reported to the Chief Financial Officer (CFO) or their designate.
- **Tracking & Follow-Up:** Every report submitted through the third-party provider will generate a **tracking number**. This allows the whistleblower to follow up, provide additional information, or check the status of the report.
- **Investigation:** Concerns will be promptly and thoroughly reviewed. While specific disciplinary outcomes cannot be shared for legal/privacy reasons, whistleblowers will be informed when an investigation is complete and whether corrective action has been taken.

Whistleblower Resources



- **Website:** A secure online portal, accessible via computer, tablet, or smartphone, available 24/7. Reports can be filed anonymously, documents may be attached, and follow-up can be conducted with a username and password.
- **Hotline:** A bilingual operator is available 24/7 to receive reports. Callers may remain anonymous, and reports will be transcribed into the secure system.
- **Email:** A dedicated third party-managed email is available 24/7. Messages are uploaded into the secure reporting system, and follow-up can be managed confidentially through the platform.

Non-Retaliation Commitment

- **Good Faith Protection:** No individual who reports a concern in good faith will face harassment, retaliation, or adverse employment consequences (including termination, suspension, demotion, or transfer).
- **Accountability for Retaliation:** Any employee who retaliates against a whistleblower will be subject to disciplinary action, up to and including termination for cause.
- **Good Faith Defined:** Reporting “in good faith” means the whistleblower has reasonable grounds to believe misconduct occurred or may occur, and reports sincerely, even if the allegation is later unsubstantiated.
- **False Reports:** Malicious or knowingly false allegations are a violation of this policy and may result in disciplinary action.

Responsibilities

- **Employees and Officers:** Must comply with the Code of Conduct and promptly report suspected violations.
- **Management and Investigators:** Must treat reports seriously, protect confidentiality, and ensure timely, impartial investigations.
- **Board of Directors:** Provides oversight and ensures the integrity of the whistleblower process.

Reporting Matrix

In cases where a report involves specific senior officers or Board members, access is restricted according to the Reporting Management Matrix (*see Appendix*). This ensures complaints are handled by individuals independent of the subject of the report.



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Report Management Team						
	Elliot Muchnik Chief Financial Officer elliott.muchnik@illum.com o. 416.218.9888 ext.5300 m.416.451.3100	Simon Cairns Chief Executive Officer simon.cairns@illum.com m. 778.996.6415	Sheldon Pollak Chairman of the Board of Directors sheldon.pollack@illum.com m.416.543.8288	Michael Amaro Vice-President Finance michael.amaro@illum.com o. 416.218.9888 (x5414) m. 647.328.3604	Tara Whelan Vice President Human Resources tara.whelan@illum.com m. 416.875.0117	KPMG
If the report involves:						
Chief Financial Officer Le directeur des services financiers	X	✓	X	X	✓	✓
Vice-President Finance Le vice-président, finances	X	✓	X	X	✓	✓
A member of the finance team Un membre de l'équipe des finances	X	✓	X	X	✓	✓
Chief Executive Officer Le Directeur général	X	X	✓	X	✓	✓
Chairman of the Board of Directors Le Président du conseil d'administration	X	✓	X	X	✓	✓
A member of the Human Resources team Un membre de l'équipe des HR	X	✓	X	✓	X	✓
Any other person <i>Toute autre personne</i>	✓	X	X	✓	✓	✓
✓ = Access granted to this person X = This person does not have access.						