



**illumina Holdings Inc.  
Insider Trading Policy**

**1. Purpose**

illumina Holdings Inc. (the “Company”) is committed to protecting shareholder confidence and maintaining the highest standards of integrity in securities trading. This Policy is designed to prevent improper trading in the Company’s securities and the misuse of Material Non-public Information (“MNPI”).

**2. Application**

This Policy applies to:

- All employees, officers, and directors of the Company and its subsidiaries.
- Consultants, contractors, and advisors who may have access to MNPI.
- Immediate family members and members of the same household of the above individuals.
- Any person who receives MNPI from an insider (“tippees”).

This Policy covers all transactions in the Company’s securities, including shares, options, convertible debentures, and any other securities issued by the Company.

**3. Key Definitions**

- **Material Information:** Information that a reasonable investor would consider important in making an investment decision (e.g., earnings, mergers, acquisitions, financing, product launches, regulatory approvals).
- **Non-public Information:** Information that has not been broadly disclosed to the public through press releases, regulatory filings, or other official communications.
- **Material Non-public Information (MNPI):** Any combination of the above — information that is both material and non-public.

**4. Prohibited Conduct**

- **Trading on MNPI:** Insiders must not buy or sell the Company’s securities while in possession of MNPI.
- **Tipping:** Insiders must not share MNPI with others, including family and friends, if it could reasonably be expected they may trade on it.
- **Passing Along Information:** Recommending trades based on MNPI is prohibited, even if the insider does not trade themselves.

**5. Trading Restrictions**

- **Blackout Periods:** Insiders are prohibited from trading during designated blackout periods, typically before quarterly earnings releases or major corporate announcements. The Company will notify insiders of applicable blackout dates.
- **Pre-Clearance:** Directors, officers, and certain designated employees must obtain approval from the Legal/Compliance team before trading Company securities.



## 6. Compliance and Enforcement

- **Consequences of Violations:** Violating this Policy or securities laws may result in disciplinary action (up to termination), regulatory fines, and criminal liability.
- **Reporting Concerns:** If unsure about a trade or in possession of possible MNPI, insiders should contact the Legal or Compliance team before proceeding.

## 7. Acknowledgment

All individuals covered by this Policy must acknowledge annually that they have read, understood, and will comply with the Policy.