

**PERSONALIS, INC.**

**CODE OF BUSINESS CONDUCT AND  
ETHICS**

**商业行为和道德准则**

Approved by the Board of Directors: May 23, 2019

董事会于2019年5月23日批准

Effective Date: June 19, 2019

生效日：2019年6月19日

---

**INTRODUCTION**

**引言**

We are committed to maintaining the highest standards of business conduct and ethics. This Code of Business Conduct and Ethics (this “*Code*”) reflects the business practices and principles of behavior that support this commitment. We expect every employee, officer and director to read and understand this Code and its application to the performance of his or her business responsibilities. References in this Code to employees are intended to cover officers and, as applicable, directors.

我们致力于保持最高标准的商业行为和道德规范。本商业行为和道德准则(本“*准则*”)反映了支持前述目标的商业惯例和行为准则。我们希望每位员工、高级管理人员和董事都能阅读并理解本准则及其在履行业务职责中的应用。本准则提及的员工也包括高级管理人员和董事（如适用）。

Officers, managers and other supervisors are expected to develop in employees a sense of commitment to the spirit, as well as the letter, of this Code. Supervisors are also expected to ensure that all agents and contractors conform to Code standards when working for or on behalf of Personalis, Inc. (together with its consolidated subsidiaries, the “*Company*,” “*us*,” “*we*,” or “*our*”). Nothing in this Code alters your employment relationship with the Company.

高级管理人员、经理和其他主管应培养员工遵守本准则的精神和文字的意识。主管还应确保所有代理和承包商在为Personalis公司或代表 Personalis公司（与其合并报表的子公司，合称为“*公司*”、“*我们*”或“*我们的*”）工作时遵守本准则。本准则并未改变您与公司的劳动关系。

This Code addresses conduct that is particularly important to proper dealings with the people and entities with whom we interact, but reflects only a part of our commitment. From time to time we may adopt additional policies and procedures with which our employees, officers and directors are expected to comply, if applicable to them. However, it is the responsibility of each employee, officer and director to apply common sense, together with his or her own highest personal ethical standards, in making business decisions where there is no stated guideline in this

Code.

本准则涉及的行为对于正确处理与我们互动的人员和实体的关系尤为重要，但仅反映了我们承诺的一部分。我们可不时通过其他的政策和程序，并希望公司的员工、高级管理人员和董事遵守（如果适用）。但是，在本准则没有明确规定的情况下，每个员工、高级管理人员和董事都有责任运用常识及其个人最高道德标准作出业务决策。

Action by members of your family, significant others or other persons who live in your household (referred to in this Code as “*family members*”) also may potentially result in ethical issues to the extent that they involve the Company’s business. For example, acceptance of inappropriate gifts by a family member from one of our partners or suppliers could create a conflict of interest and result in a Code violation attributable to you. Consequently, in complying with this Code, you should consider not only your own conduct, but also that of your family members, significant others and other persons who live in your household.

您的家庭成员、重要他人或其他与您同住的人（在本准则中称为“*家庭成员*”）所采取的行为，在涉及公司业务的范围时也可能导致道德问题。例如，家庭成员收受来自我们的合作伙伴或供应商之一的不当礼物可能会造成利益冲突，且导致违反准则并归责于您。因此，在遵守本准则时，您不仅应考虑自己的行为，还应考虑您的家庭成员、重要他人和其他与您同住的人的行为。

**You should not hesitate to ask questions about whether any conduct may violate this Code, voice concerns or clarify gray areas. Section 16 below details the compliance resources available to you. In addition, you should be alert to possible violations of this Code by others and report suspected violations, without fear of any form of retaliation, as further described in Section 16.** Violations of this Code will not be tolerated. Any employee who violates the standards in this Code may be subject to disciplinary action, which, depending on the nature of the violation and the history of the employee, may range from a warning or reprimand to and including termination of employment and, in appropriate cases, civil legal action or referral for regulatory or criminal prosecution.

您应该毫不犹豫地询问是否有任何行为可能违反本准则，表达关切或澄清灰色地带。下文第16节详述了您可以获取的合规资源。此外，如第16节所述，您应警惕其他人可能违反本准则的行为，并报告可疑的违规行为，而无需担心任何形式的报复。违反本准则的行为是不能容忍的。任何违反本准则中所列标准的员工可能会受到从警告或训斥到包括解除劳动关系在内的各种处分，或在适当的情况下采取民事法律行为、提交监管部门或刑事起诉，根据违规的性质和员工的历史行为而定。

## ***1. Honest and Ethical Conduct*** ***诚实和道德行为***

It is the policy of the Company to promote high standards of integrity by conducting our affairs in an honest and ethical manner. The integrity and reputation of the Company depends on the honesty, fairness and integrity brought to the job by each person associated with us. Unyielding personal integrity is the foundation of corporate integrity.

公司的政策是以诚实和道德的方式处理我们的事务，以促进高标准的诚信。公司的诚信和声誉取决于与公司相关的每个人在工作中的诚实、公正和诚信。不妥协的个人诚信是企业诚信的基础。

## **2. Legal Compliance** **法律合规**

Obeying the law, both in letter and in spirit, is the foundation of this Code. Our success depends upon each employee operating within legal guidelines and cooperating with local, national and international authorities. We expect employees to understand the legal and regulatory requirements applicable to their business units and areas of responsibility. For example, our laboratory and the laboratory testing we perform are subject to a number of legal and regulatory requirements, including federal and state licensing requirements and standards related to proper clinical conduct. We expect employees to comply with all such requirements. We may hold periodic training sessions to ensure that all employees comply with the relevant laws, rules and regulations associated with their employment, including laws prohibiting insider trading (which are discussed in further detail in [Section 3](#) below). While we do not expect you to memorize every detail of these laws, rules and regulations, we want you to be able to determine when to seek advice from others. If you do have a question in the area of legal compliance, it is important that you not hesitate to seek answers from your supervisor or the Compliance Officer (as further described in [Section 16](#)).

遵守法律，无论在文字上还是在精神上，是本准则的基础。我们的成功取决于每位员工在法律准则范围内开展工作并与地方、国家和国际机构合作。我们希望员工了解适用于其业务部门和职责范围的法律、法规要求。例如，我们的实验室和所进行的实验室测试需符合多项法律法规要求，包括联邦和州的许可要求及与适当临床行为相关的标准。我们期望员工遵守所有该等要求。我们将定期举办培训课程，以确保全体员工遵守与其劳动关系相关的相关法律、法规和规定，包括禁止内幕交易的法律（详见下文第3节）。虽然我们并不期望您记住这些法律、法规和规定的每一个细节，但我们希望您能够决定何时向他人寻求建议。如果您确实有法律合规领域方面的问题，您应毫不犹豫地让您的主管或合规官询问（详见第16节）。

Disregard of the law will not be tolerated. Violation of domestic or foreign laws, rules and regulations may subject an individual, as well as the Company, to civil and/or criminal penalties. You should be aware that conduct and records, including emails, are subject to internal and external audits and to discovery by third parties in the event of a government investigation or civil litigation. It is in everyone's best interests to know and comply with our legal obligations.

我们绝不容忍无视法律的行为。违反境内外法律、法规和规定的行为，可能会使个人或公司受到民事和/或刑事处罚。您应知悉，行为和记录（包括电子邮件）会受到内部和外部审计，并在政府调查或民事诉讼的情况下作为证据提供给第三方查看。了解并遵守我们的法律义务符合每个人的最大利益。

## **3. Insider Trading** **内幕交易**

Employees who have access to confidential (or “*inside*”) information are not permitted to use or share that information for stock trading purposes or for any other purpose except to conduct our business. All nonpublic information about the Company or about companies with which we do business is considered confidential information. To use material, nonpublic information in connection with buying or selling securities, including “tipping” others who might make an

investment decision on the basis of this information, is both unethical and illegal. Employees must exercise the utmost care when handling material inside information.

有权访问保密(或“内幕”)信息的员工,除开展公司业务外,不得将其用于股票交易目的或任何其他目的或共享该等信息。所有有关公司或与我们有业务往来的企业的非公开信息均被视为保密信息。在买卖证券时使用重要的非公开信息,包括向可能根据该信息做出投资决定的人“透露”信息,是不道德且违法的。员工在处理重大内幕消息时必须非常格外小心。

We have adopted a separate Insider Trading Policy with which you will be expected to comply as a condition of your employment with the Company. You should consult our Insider Trading Policy for more specific information on the definition of “inside” information and on buying and selling our securities or securities of companies with which we do business.

我们制订了单行的《内幕交易政策》,作为您受雇于公司的条件之一,您应遵守该政策。您应查阅《内幕交易政策》有关“内幕”信息的定义以及有关买卖我们或与我们有业务往来的企业的证券的更多具体信息。

#### **4. *International Business Law***

##### ***国际商业法律***

Our employees are expected to comply with the applicable laws in all countries to which they travel, in which they operate and where we otherwise do business, including laws prohibiting bribery, corruption or the conduct of business with specified individuals, companies or countries. The fact that in some countries certain laws are not enforced or that violation of those laws is not subject to public criticism will not be accepted as an excuse for noncompliance. In addition, we expect employees to comply with U.S. laws, rules and regulations governing the conduct of business by its citizens and corporations outside the United States.

我们的员工应遵守其前往的、在其中开展业务的以及我们以其他方式开展业务的所有国家的适用法律,包括禁止贿赂、腐败或与特定个人、公司或国家开展业务的法律。有些国家的某些法律并未得到执行,或违反这些法律而未受到公开批评,但这一事实不能成为不遵守法律的借口。此外,我们希望员工遵守美国有关其公民和公司在美国境外开展业务的法律、法规和规定。

These U.S. laws, rules and regulations, which extend to all our activities outside the United States, include:

这些美国法律、法规和规定适用于我们在美国境外的所有活动,包括:

- The U.S. Foreign Corrupt Practices Act, which prohibits directly or indirectly giving anything of value to a government official to obtain or retain business or favorable treatment and requires the maintenance of accurate books of account, with all company transactions being properly recorded;  
美国《反海外腐败法》,该法律禁止直接或间接地给予政府官员以任何有价之物以获得或保留业务或优惠待遇,并要求保持准确的账簿、正确记录所有公司交易;
- U.S. embargoes, which generally prohibit U.S. companies, their subsidiaries and their

employees from doing business with or traveling to countries subject to sanctions imposed by the U.S. government, as well as specific companies and individuals identified on lists published by the U.S. Treasury Department;

美国的禁运令，通常禁止美国公司、其子公司及其雇员与受到制裁美国政府制裁的国家，以及在美国财政部公布名单上的特定公司、个人开展业务或前往这些国家；

- U.S. export controls, which restrict exports from the United States and re-exports from other countries of goods, software and technology to many countries, and prohibit transfers of U.S.-origin items to denied persons and entities; and  
美国的出口管制，限制从美国出口和从其他国家再出口的货物、软件和技术至多个国家，并禁止向被拒绝的个人和实体转让原产于美国的物品；
- U.S. antiboycott regulations, which prohibit U.S. companies from taking any action that has the effect of furthering or supporting a restrictive trade practice or boycott imposed by a foreign country against a country friendly to the United States or against any U.S. person.

美国的《反联合抵制条例》禁止美国公司采取任何行动，以促进或支持外国对美国友好国家或任何美国人实施的限制性贸易惯例或联合抵制。

If you have a question as to whether an activity is restricted or prohibited, seek assistance before taking any action, including giving any verbal assurances that might be regulated by international laws. Additionally, we have adopted a separate Anti-Corruption Policy with which you will be expected to comply as a condition of your employment with the Company. You should consult our Anti-Corruption Policy for more specific information on compliance with the U.S. Foreign Corrupt Practices Act and other anti-corruption laws.

如果您对某项活动是否受到限制或禁止有疑问，请在采取任何行动之前寻求协助，包括提供可能受到国际法约束的口头保证。此外，我们还制订了一项单行的《反腐败政策》，作为您受雇于公司的一项条件，您应遵守该政策。您应查询我们的《反腐败政策》，以获取有关遵守美国《反海外腐败法》和其他反腐败法律的更多具体信息。

## **5. Antitrust** **反垄断**

Antitrust laws are designed to protect the competitive process. These laws are based on the premise that the public interest is best served by vigorous competition and will suffer from illegal agreements or collusion among competitors. Antitrust laws generally prohibit:

反垄断法旨在保护竞争过程。这些法律的前提是，激烈的竞争最符合公众利益，而竞争者之间达成非法协议或相互串通将损害公众利益。反垄断法律普遍禁止：

- agreements, formal or informal, with competitors that harm competition or customers, including price fixing and allocations of customers, territories or contracts;  
与竞争对手达成的损害竞争或客户的正式或非正式协议，包括定价和分配客户、区域或合同
- agreements, formal or informal, that establish or fix the price at which a customer

may resell a product; and

确定或固定客户转售商品价格的正式或非正式协议；以及

- the acquisition or maintenance of a monopoly or attempted monopoly through anti-competitive conduct.

通过反竞争行为获得或维持垄断或企图垄断。

Certain kinds of information, such as pricing, production, inventory, business plans, strategies, budgets, projections, forecasts, financial and operating information, methods and development plans, should not be exchanged with competitors, regardless of how innocent or casual the exchange may be and regardless of the setting, whether business or social.

经营者之间不得相互提供特定种类的信息，如价格、产量、库存、经营计划、策略、预算、预测、财务和发展计划，无论这种交换是多么无害和偶然、无论在何种处境下、无论在商业或社交场合。

Antitrust laws impose severe penalties for certain types of violations, including criminal penalties and potential fines and damages of millions of dollars, which may be tripled under certain circumstances. Understanding the requirements of antitrust and unfair competition laws of the various jurisdictions where we do business can be difficult, and you are urged to seek assistance from your supervisor or the Compliance Officer whenever you have a question relating to these laws.

反垄断法律对某些类型的违法行为给予严厉处罚，包括刑事处罚、可能的罚款及数百万美元的赔偿金，且该赔偿金在某些情况下将高达三倍。了解我们开展业务的各个司法辖区的反垄断法和反不正当竞争法的将会很困难，因此，我们敦促您在遇到与这些法律相关的问题时，向您的主管或合规官寻求帮助。

## **6. *Environmental Compliance***

### **环境合规**

Federal law imposes criminal liability on any person or company that contaminates the environment with any hazardous substance that could cause injury to the community or environment. Violation of environmental laws can involve monetary fines and imprisonment. We expect employees to comply with all applicable environmental laws.

联邦法律对使用可能对社区或环境造成损害的任何有害物质而导致环境污染的任何个人或公司规定了刑事责任。违反环境法律可能导致罚款和监禁。我们期望员工遵守所有适用的环境法律。

## **7. *Conflicts of Interest***

### **利益冲突**

We respect the rights of our employees to manage their personal affairs and investments and do not wish to impinge on their personal lives. At the same time, employees should avoid conflicts of interest that occur when their personal interests may interfere in any way with the performance of their duties or the best interests of the Company. A conflicting personal interest could result from an expectation of personal gain now or in the future or from a need to satisfy a prior or concurrent personal obligation. We expect our employees to be free from influences that

conflict with the best interests of the Company or might deprive the Company of their undivided loyalty in business dealings. Even the appearance of a conflict of interest where none actually exists can be damaging and should be avoided. Whether or not a conflict of interest exists or will exist can be unclear. Conflicts of interest are prohibited unless specifically authorized as described below.

我们尊重员工管理其个人事务和投资的权利，无意冒犯他们的个人生活。同时，当员工的个人利益可能以任何方式干扰其履行职责或公司的最大利益时，员工应避免发生利益冲突。个人的利益冲突可能来自于对现在或将来个人利益的期望，也可能来自于对履行先前或当下个人义务的需要。我们希望我们的员工免受与公司最大利益相冲突或丧失对公司忠诚度的影响。即使表面上没有真正存在的利益冲突也可能造成损害，所以应当避免。利益冲突是否存在或将会存在尚不清楚。除非有下文中的特别授权，否则禁止利益冲突。

If you have any questions about a potential conflict or if you become aware of an actual or potential conflict, and you are not an officer or director of the Company, you should discuss the matter with your supervisor or the Compliance Officer (as further described in [Section 16](#)). Supervisors may not authorize conflict of interest matters or make determinations as to whether a problematic conflict of interest exists without first seeking the approval of the Compliance Officer and providing the Compliance Officer with a written description of the activity. If the supervisor is involved in the potential or actual conflict, you should discuss the matter directly with the Compliance Officer. Officers and directors may seek authorizations and determinations from the Audit Committee (the “*Audit Committee*”) of the Company’s Board of Directors. Factors that may be considered in evaluating a potential conflict of interest are, among others:

如果您对潜在冲突有任何疑问，或者如果您意识到存在实际或潜在的冲突，并且您不是公司的高级管理人员或董事，您应当与您的主管或合规官讨论此事(详见第16节)。在未事先寻求合规官的批准并向合规官提供活动的书面说明之前，主管不得授权利益冲突事项或决定是否存在有问题的利益冲突。如果主管涉及潜在或实际的冲突，您应该直接与合规官讨论此事。高级管理人员和董事可向公司董事会审计委员会（“*审计委员会*”）寻求授权和决定。在评估潜在利益冲突时可能考虑的因素包括：

- whether it may interfere with the employee’s job performance, responsibilities or morale;  
是否可能影响员工的工作表现、职责或士气；
- whether the employee has access to confidential information;  
员工是否接触到保密信息；
- whether it may interfere with the job performance, responsibilities or morale of others within the organization;  
是否会干扰其他人员在公司内的工作表现、职责和士气；
- any potential adverse or beneficial impact on our business;  
对我们的业务可能产生的任何不利或有利影响；
- any potential adverse or beneficial impact on our relationships with our customers, partners, or suppliers or other service providers;

对我们与客户、合作伙伴或供应商或其他服务提供商的关系可能产生的任何不利或有利影响；

- whether it would enhance or support a competitor's position;  
是否会增强或支持竞争对手的地位；
- the extent to which it would result in financial or other benefit (direct or indirect) to the employee;  
将在多大程度上为员工带来财务或其他利益（直接或间接）；
- the extent to which it would result in financial or other benefit (direct or indirect) to one of our customers, partners, suppliers or other service providers; and  
将在多大程度上给我们的客户、合作伙伴、供应商或其他服务提供商带来财务或其他利益（直接或间接）； 和
- the extent to which it would appear improper to an outside observer.  
从外人看来行为的不当程度。

Although no list can include every possible situation in which a conflict of interest could arise, the following are examples of situations that may, depending on the facts and circumstances, involve problematic conflicts of interests:

虽然无法一一列举可能发生利益冲突的所有情形，但根据事实和情形，可能会涉及到有问题的利益冲突情形如下：

- **Employment by (including consulting for) or service on the board of a competitor, customer, partner or supplier or other service provider.** Activity that enhances or supports the position of a competitor to the detriment of the Company is prohibited, including employment by or service on the board of a competitor. Employment by or service on the board of a customer, partner or supplier or other service provider is generally discouraged and you must seek authorization in advance if you plan to take such a position.  
受雇于（包括提供咨询）竞争对手、客户、合作伙伴或供应商或其他服务提供商，或在该等实体的董事会中任职。禁止以损害公司利益的方式提高或支持竞争对手地位的活动，包括受雇于竞争对手或在其董事会中任职。公司一般不鼓励您受雇于客户、合作伙伴或供应商或其他服务提供商或在其董事会中任职，如果您计划担任此类职位，必须事先获得授权。
- **Owning, directly or indirectly, a significant financial interest in any entity that does business, seeks to do business or competes with us.** In addition to the factors described above, persons evaluating ownership in other entities for conflicts of interest will consider the size and nature of the investment; the nature of the relationship between the other entity and the Company; the employee's access to confidential information and the employee's ability to influence Company decisions. If you would like to acquire a financial interest of that kind, you must seek approval in advance.

在与我们开展业务、寻求开展业务或直接竞争的实体中，直接或间接拥有重大财务利益。除上述因素外，工作人员在评估其他实体的所有权是否存在利益冲



突的时候，将考虑投资的规模和性质、其他实体与公司之间关系的性质、员工对保密信息的接触情况以及员工影响公司决策的能力。如果您想获得此类型的经济利益，您必须事先征得同意。

- **Soliciting or accepting gifts, favors, loans or preferential treatment from any person or entity that does business or seeks to do business with us.** See [Section 11](#) for further discussion of the issues involved in this type of conflict.

向与我们有业务往来或寻求与我们有业务往来的任何个人或实体索取或接受礼物、优惠、贷款或优惠待遇。有关此类冲突所涉问题的进一步讨论，请参见第11节。

- **Soliciting contributions to any charity or for any political candidate from any person or entity that does business or seeks to do business with us.**

向与我们有业务往来或寻求与我们有业务往来的任何个人或实体为任何慈善机构或任何政治候选人募捐。

- **Taking personal advantage of corporate opportunities.** See [Section 8](#) for further discussion of the issues involved in this type of conflict.

利用公司机会谋取个人利益。关于此类冲突所涉问题的进一步讨论，见第8节。

- **“Moonlighting” (i.e., having a second job in addition to your employment with the Company) without permission.**

未经许可“兼职”(即在受雇于公司的基础上从事第二份工作)。

- **Conducting our business transactions with your family member or a business in which you have a significant financial interest.** Material related-party transactions approved by the Audit Committee and involving any executive officer or director will be publicly disclosed as required by applicable laws and regulations and in keeping with the Company’s Related Person Transactions Policy.

与您的家庭成员或您有重大财务利益的企业进行我们的业务交易。审计委员会批准的涉及任何高级管理人员或董事的重大关联交易将根据适用法律法规的要求以及公司的《关联交易政策》予以公开披露。

- **Exercising supervisory or other authority on behalf of the Company over a co-worker or consultant who is also a family member without permission.** The employee’s supervisor and/or the Compliance Officer will consult with the Human Resources department to assess the advisability of reassignment.

未经许可，代表公司对同样是家庭成员的同事或顾问行使监督或其他权力。员工的主管和/或合规官将与人力资源部协商，以评估调岗的可行性。

Loans to, or guarantees of obligations of, employees or their family members by the Company could constitute an improper personal benefit to the recipients of these loans or guarantees, depending on the facts and circumstances. Some loans are expressly prohibited by law and applicable law requires that our Board of Directors approve all loans and guarantees to employees. As a result, all loans and guarantees by the Company must be approved in advance by the Board of Directors or the Audit Committee.

公司向员工或其家庭成员提供的贷款或义务担保，可能会视事实和情况而为这些贷

款或担保的接受者带来不当的个人利益。法律明确禁止某些贷款，且适用法律要求我们的董事会批准所有向员工提供的贷款和担保。因此，公司的所有贷款和担保必须事先获得董事会或审计委员会的批准。

## **8. *Corporate Opportunities*** **公司机会**

You may not take personal advantage of opportunities for the Company that are presented to you or discovered by you as a result of your position with us or through your use of corporate property or information, unless authorized by your supervisor, the Compliance Officer or the Audit Committee, as described in Section 7 above. Even opportunities that are acquired privately by you may be questionable if they are related to our existing or proposed lines of business. Significant participation in an investment or outside business opportunity that is directly related to our lines of business must be pre-approved. You may not use your position with us or corporate property or information for improper personal gain, nor should you compete with us in any way.

您不得利用公司提供的机会、因您在公司的职位而发现的机会或通过使用公司财产或信息，来谋取个人利益，除非如上文第7节所述您取得了您主管、合规官或审计委员会的授权。即使是您私下获得的机会，如果与我们现有或计划的业务线相关，也可能存在问题。您对我们业务直接相关的投资或外部业务机会的显著参与，必须事先获得批准。您不得利用您在公司的职位，或利用公司财产或信息谋取不正当的个人利益，也不得以任何方式与我们竞争。

## **9. *Maintenance of Corporate Books, Records, Documents and Accounts; Financial Integrity; Public Reporting*** **保存公司账簿、记录、文件和账目；财务诚信；公开报告**

The integrity of our records and public disclosure depends upon the validity, accuracy and completeness of the information supporting the entries to our books of account. Therefore, our corporate and business records should be completed accurately and honestly. The making of false or misleading entries, whether they relate to financial results or otherwise, is strictly prohibited. Our records serve as a basis for managing our business and are important in meeting our obligations to customers, suppliers, partners, creditors, employees and others with whom we do business. As a result, it is important that our books, records and accounts accurately and fairly reflect, in reasonable detail, our assets, liabilities, revenues, costs and expenses, as well as all transactions and changes in assets and liabilities. We require that:

我们的记录和公开披露的真实性，取决于提供给我们的帐簿记录中信息的有效性、准确性和完整性。因此，我们应准确、诚实地填写公司和业务记录。严禁做出任何虚假或误导性的记录，无论这些条目是否涉及财务结果。我们的记录是管理我们业务的基础，且对于履行我们对客户、供应商、合作伙伴、债权人、员工和其他与我们有业务往来的人的义务时至关重要。因此，我们的账簿、记录和账目应准确、公允地合理详细地反映我们的资产、负债、收入、成本和费用，以及所有交易和资产和负债的所有交易和变动。我们要求：

- no entry be made in our books and records that intentionally hides or disguises the nature of any transaction or of any of our liabilities or misclassifies any transactions

as to accounts or accounting periods;

在我们的账簿和记录中，不得故意隐瞒或掩饰任何交易的性质、任何负债，亦不得将任何交易归类到错误账目或会计期间；

- Transactions be supported by appropriate documentation;

交易须有适当的文件支持；

- the terms of sales, if applicable, and other commercial transactions be reflected accurately in the documentation for those transactions and all such documentation be reflected accurately in our books and records;

销售条款（如适用）及其他商业交易应准确反映在交易文件中，而所有此类文件应准确反映在我们的账簿和记录中；

- employees comply with our system of internal controls; and

员工遵守我们的内部控制；以及

- no cash or other assets be maintained for any purpose in any unrecorded or “off-the-books” fund.

不得以任何目的在任何未入账或“账外”基金中保留现金或其他资产。

Our accounting records are also relied upon to produce reports for our management, stockholders and creditors, as well as for governmental agencies. In particular, we rely upon our accounting and other business and corporate records in preparing the periodic and current reports that we file with the U.S. Securities and Exchange Commission (the “SEC”). Securities laws require that these reports provide full, fair, accurate, timely and understandable disclosure and fairly present our financial condition and results of operations. Employees who collect, provide or analyze information for or otherwise contribute in any way in preparing or verifying these reports should strive to ensure that our financial disclosure is accurate and transparent and that our reports contain all of the information about the Company that would be important to enable stockholders and potential investors to assess the soundness and risks of our business and finances and the quality and integrity of our accounting and disclosures. In addition:

我们依靠会计记录来为我们的管理层、股东和债权人以及政府机构提供报告。尤其是，我们依赖于我们的会计及其他业务和公司记录，用于编制向美国证券交易委员会（“美国证监会”）提交的定期报告和当期报告。证券法律要求报告必须完整、公允、准确、及时、易懂地反映公司的财务状况和经营成果。为准备或核实该等报告时，负责收集、提供或分析信息或以其他方式作出贡献的员工应努力确保我们的财务披露准确、透明，并确保我们的报告涵盖了关于公司的所有重要信息，这对于股东和潜在投资者评估我们业务和财务的稳健性和风险、我们的会计和披露的质量和完整性非常重要。此外：

- no employee may knowingly take or authorize any action that would cause our financial records or financial disclosure to fail to comply with generally accepted accounting principles, the rules and regulations of the SEC or other applicable laws, rules and regulations;

任何员工不得故意采取或授权采取任何可能导致我们的财务记录或财务披露不符合公认的会计原则、美国证监会的规定和条例或其他适用的法律、法规和规

定的行为；

- all employees must cooperate fully with our finance and accounting personnel, as well as our independent public accountants and counsel, respond to their questions with candor and provide them with complete and accurate information to help ensure that our books and records, as well as our reports filed with the SEC, are accurate and complete;

所有员工必须全面配合我们的财务和会计人员、独立注册会计师和法律顾问，坦诚地回答他们的问题，并向他们提供完整准确的信息，以帮助确保我们的账簿和记录以及向美国证监会提交的报告准确完整；

- no employee, director or person acting under their direction, may coerce, manipulate, mislead or fraudulently influence our finance and accounting personnel, our independent public accountants or counsel; and

任何员工、董事或根据其指示行事的人员均不得胁迫、操纵、误导或欺诈性地影响我们的财务和会计人员、独立注册会计师或法律顾问；以及

- no employee should knowingly make (or cause or encourage any other person to make) any false or misleading statement in any of our reports filed with the SEC or knowingly omit (or cause or encourage any other person to omit) any information necessary to make the disclosure in any of our reports accurate in all material respects.

任何员工均不得故意在向美国证监会提交的任何报告中作出（或促使或鼓励任何其他主体作出）任何虚假或误导性陈述，亦不得故意遗漏（或促使或鼓励任何其他主体遗漏）任何必要信息，该等信息使得我们在各个重要方面的报告均准确无误。

Any employee who becomes aware of any departure from these standards has a responsibility to report his or her knowledge promptly to a supervisor, the Chief Financial Officer, the Compliance Officer, the Audit Committee or one of the other compliance resources described in Section 16 or in accordance with the provisions of the Company's Whistleblower Policy for Accounting and Auditing Matters (the "**Whistleblower Policy**").

任何员工在发现任何偏离这些标准的情况时，有责任立即向主管、首席财务官、合规官、审计委员会或第16节所述的其他合规资源之一报告，或根据公司的《会计和审计事项举报政策》（“《**举报政策**》”）的规定进行举报。

## **10. Fair Dealing** **公平交易**

We strive to outperform our competition fairly and honestly. Advantages over our competitors are to be obtained through superior performance of our products and services, not through unethical or illegal business practices. Acquiring proprietary information from others through improper means, possessing trade secret information that was improperly obtained, or inducing improper disclosure of confidential information from past or present employees of other companies is prohibited, even if motivated by an intention to advance our interests. If information is obtained by mistake that may constitute a trade secret or other confidential information of another business, or if you have any questions about the legality of proposed information gathering,

you must consult your supervisor or the Compliance Officer, as further described in [Section 16](#).

我们努力以公平和诚实的方式超越我们的竞争对手。我们通过产品和服务的卓越性能，而非不道德或非法的商业行为来获得比竞争对手更多的优势。禁止通过不正当手段获取他人的专有信息、拥有以不正当手段获取的商业秘密信息、诱导其他公司过去或现在的员工以不正当手段披露机密信息，即便是出于促进我们利益的目的。如果错误获取的信息可能构成其他公司的商业秘密或其他机密信息，或者如果您对所收集信息的合法性有任何疑问，您务必咨询您的主管或合规官，详见[第16节](#)。

You are expected to deal fairly with our customers, suppliers, partners, employees and anyone else with whom you have contact in the course of performing your job. Be aware that the Federal Trade Commission Act provides that “unfair methods of competition in commerce, and unfair or deceptive acts or practices in commerce, are declared unlawful.” It is a violation of the Federal Trade Commission Act to engage in deceptive, unfair or unethical practices and to make misrepresentations in connection with sales activities.

您应该公平地对待我们的客户、供应商、合作伙伴、员工以及在工作过程中与您接触的任何其他人。请注意，《联邦贸易委员会法》规定，“商业中的不正当竞争方法，以及商业中的不正当或欺骗性行为或做法，均被宣布为非法”。从事欺骗性、不正当或不道德的做法，以及在销售活动中作虚假陈述，都属于违反《联邦贸易委员会法》的行为。

Employees involved in procurement have a special responsibility to adhere to principles of fair competition in the purchase of products and services by selecting suppliers based exclusively on normal commercial considerations, such as quality, cost, availability, service and reputation, and not on the receipt of special favors.

参与采购的员工负有特别责任，在购买产品和服务时遵守公平竞争的原则，即仅根据正常的商业考虑因素（如质量、成本、可用性、服务和声誉）来选择供应商，而非接受特殊好处。

## ***11. Gifts and Entertainment***

### ***礼品和招待***

Business gifts and entertainment are meant to create goodwill and sound working relationships and not to gain improper advantage with partners or customers or facilitate approvals from government officials. The exchange, as a normal business courtesy, of meals or entertainment (such as tickets to a game or the theatre or a round of golf) is a common and acceptable practice as long as it is reasonable in value and not extravagant. Unless express permission is received from a supervisor, the Compliance Officer or the Audit Committee, gifts and entertainment cannot be offered, provided or accepted by any employee unless consistent with customary business practices and not (a) of more than token or nominal monetary value, (b) in cash, (c) susceptible of being construed as a bribe or kickback, (d) made or received on a regular or frequent basis or (e) in violation of any laws. This principle applies to our transactions everywhere in the world, even where the practice is widely considered “a way of doing business.” Employees should not accept gifts or entertainment that may reasonably be deemed to affect their judgment or actions in the performance of their duties. Our partners, customers, suppliers and the public at large should know that our employees’ judgment is not for sale.

商务礼品和招待是用于建立良好的商誉和友好的合作关系，而非获得合作伙伴或客户的不正当利益，亦非为了获取政府官员的批准。只要价值合理、不奢侈，餐饮和招待的

交换（如比赛、剧院的门票或一轮高尔夫球）作为一种正常的商务礼节是普遍和可接受的做法。除非获得主管、合规官或审计委员会的明确许可，否则任何员工不得提议、提供或接受礼品和招待，除非其符合商业惯例，且(a)不超过象征性或票面货币价值，(b)非现金，(c)不会被视作贿赂或回扣，(d)并非定期或频繁地给予或接受，或(e)不违反任何法律。这一原则适用于我们在世界各地的交易，甚至是在这种行为被广泛认为是“做生意的一种方式”的地方。员工不得收受在履职过程中可能被合理认为会影响其判断或者行为的礼品和招待。我们的合作伙伴、客户、供应商和广大公众应该知道，我们员工的判断力是非卖品。

Under some statutes, such as the U.S. Foreign Corrupt Practices Act (further described in [Section 4](#) above), giving anything of value to a government official to obtain or retain business or favorable treatment is a criminal act subject to prosecution and conviction. Discuss with your supervisor or the Compliance Officer any proposed entertainment or gifts if you are uncertain about their appropriateness.

根据某些法规，如美国《反海外腐败法》（详见上文第4节），向政府官员提供任何有价之物，以获得或保留业务或优惠待遇，均属于犯罪行为，将被起诉和定罪。如果您不确定任何计划的招待或礼物是否合适，请与您的主管或合规官讨论。

## ***12. Protection and Proper Use of Company Assets*** ***对公司资产的保护和适当使用***

All employees are expected to protect our assets and ensure their efficient use. Theft, carelessness and waste have a direct impact on our financial condition and results of operations. Our property, such as office supplies, computer equipment, laboratory or manufacturing supplies and office, laboratory or manufacturing space, are expected to be used only for legitimate business purposes, although incidental personal use may be permitted. You may not, however, use the Company's corporate name, any brand name or trademark owned or associated with the Company or any letterhead stationery for any personal purpose.

我们希望所有员工保护我们的资产并确保有效使用它们。偷窃、粗心大意和浪费直接影响到我们的财务状况和经营成果。我们的财产，如办公用品、计算机设备、实验室或制造用品和办公室、实验室或制造空间仅能用于合法的用途，偶尔用于个人目的也可能被批准。但是，您不得为任何个人目的使用公司的名称、公司拥有的或与公司相关的任何品牌名称，或为个人目的使用带有公司信头的信纸。

You may not, while acting on behalf of the Company or while using our computing or communications equipment or facilities, either:

您在代表公司行事或使用公司的计算机或通信设备、设施时，不得有以下行为：

- access the internal computer system (also known as “hacking”) or other resource of another entity without express written authorization from the entity responsible for operating that resource; or  
访问另一实体的内部计算机系统（亦称为“黑客”）或其他资源，但未获得负责运营该等资源的实体明确书面授权；或
- commit any unlawful or illegal act, including harassment, libel, fraud, sending of unsolicited bulk email (also known as “spam”) or material of objectionable content in violation of applicable law, trafficking in contraband of any kind or any kind of

espionage.

实施任何非法或违反行为，包括骚扰、诽谤、欺诈、发送未经请求的大量电子邮件（也称为“垃圾邮件”）或违反适用法律的不良内容、贩运任何种类的违禁品或任何种类的间谍活动。

If you receive authorization to access another entity's internal computer system or other resource, you must make a permanent record of that authorization so that it may be retrieved for future reference, and you may not exceed the scope of that authorization.

如果您收到访问另一个实体的内部计算机系统或其他资源的授权，您必须永久记录该授权，以便将来检索该授权供参考，且您不得超出该授权的范围。

Unsolicited bulk email is regulated by law in a number of jurisdictions. If you intend to send unsolicited bulk email to persons outside of the Company, either while acting on our behalf or using our computing or communications equipment or facilities, you should contact your supervisor or the Compliance Officer for prior approval.

在有些司法管辖区，非应请求发送的批量电子邮件受到法律管制。如果您打算在代表我们行事或使用我们的计算机或通讯设备时，向公司以外的主体发送未经请求的批量电子邮件，您应联系您的主管或合规官以获得事先批准。

Subject to applicable laws, all data residing on or transmitted through our computing and communications facilities, including email and word processing documents, is the property of the Company and subject to inspection, retention and review by the Company, with or without an employee's or third party's knowledge, consent or approval, in accordance with applicable law. Any misuse or suspected misuse of our assets must be immediately reported to your supervisor or the Compliance Officer.

在符合适用法律的前提下，在我们的计算和通信设施中保存或经其传输的所有数据（包括电子邮件和文字处理文件）均属于公司财产，公司可根据适用法律进行检查、保留和查看，无论员工或第三方是否知情、同意或批准。如您发现任何滥用或涉嫌滥用我们的资产的情况，您必须立即向您的主管或合规官报告。

### **13. Confidentiality**

#### **保密**

One of our most important assets is our confidential information. As an employee of the Company, you may learn of information about the Company that is confidential and proprietary. You also may learn of information before that information is released to the general public. Employees who have received or have access to confidential information should take care to keep this information confidential. Confidential information includes any and all confidential knowledge, data or information related to the Company's business or its actual or demonstrably anticipated research or development, including without limitation (a) all matters of a technical nature (such as discoveries, ideas, concepts, designs, drawings, specifications, techniques, models, diagrams, test data, scientific methods and know-how, and materials such as reagents, substances, chemical compounds, subcellular constituents, cell or cell lines, organisms and progeny, and mutants, derivatives or replications derived from or relating to any of the foregoing materials), trade secrets, inventions, ideas, processes, computer source and object code, data, formulae, programs, other works of authorship, know-how, improvements, discoveries, developments,

designs and techniques; (b) information regarding products, services, plans for research and development, marketing and business plans, budgets, financial statements, contracts, pricing and other terms, suppliers and customers; (c) information regarding the skills and compensation of the Company's employees, contractors and any other service providers of the Company; (d) the existence of any business discussions, negotiations or agreements between the company and any third party; and (e) similar types of information provided to us by our customers, suppliers and partners. This information may be protected by patent, trademark, copyright and trade secret laws.

保密信息是我们最重要的资产之一。作为公司员工，您可能会了解到有关公司的保密和专有信息。您也可能在信息发布给公众之前就获悉。已了解或可接触到保密信息的员工应注意对这些信息进行保密。保密信息包括：与公司的业务或其实际或可预见的研究、开发相关的任何和所有保密知识、数据或信息，包括但不限于(a)具有技术性质的所有事项（例如发现、构想、概念、设计、图纸、规格、工艺、模型、图表、测试数据、科学方法和专有技术，以及试剂、物质、化合物、亚细胞成分、细胞或细胞系、有机体和后代，以及源自或涉及上述任何材料的突变、衍生物或复制品）、商业秘密、发明、想法、流程、计算机源代码和目标代码、数据、配方、程序、其他著作权作品、专有技术、改良、发现、开发、设计和工艺；(b)关于产品、服务、研发计划、营销和业务计划、预算、财务报表、合同、定价及其他条款、供应商和客户的信息；(c)关于公司员工、承包商及任何其他服务提供商的技能和薪酬的信息；(d)公司与任何第三方之间关于任何业务讨论、谈判或协议的存在；以及(e)我们的客户、供应商和合作伙伴向我们提供的类似类型的信息。该等信息可能受专利、商标、版权和商业秘密法律的保护。

In addition, because we interact with other companies and organizations, there may be times when you learn confidential information about other companies before that information has been made available to the public. You must treat this information in the same manner as you are required to treat our confidential and proprietary information. There may even be times when you must treat as confidential the fact that we have an interest in, or are involved with, another company.

此外，由于我们与其他公司和组织进行互动，有时您可能在其他公司的保密信息向公众公开之前获知这些信息。您必须以对待我们的保密和专有信息的同样方式对待这些信息。甚至有时，您必须将我们在另一家公司中拥有利益或与其有关联的事实视为机密。

You are expected to keep confidential and proprietary information confidential unless and until that information is released to the public through approved channels (usually through a press release, an SEC filing or a formal communication from a member of senior management, as further described in [Section 14](#) and in compliance with our separate Corporate Disclosure Policy). Every employee has a duty to refrain from disclosing to any person confidential or proprietary information about us or any other company learned in the course of employment here, until that information is disclosed to the public through approved channels. This policy requires you to refrain from discussing confidential or proprietary information with outsiders and even with other employees of the Company, unless those fellow employees have a legitimate need to know the information in order to perform their job duties. Unauthorized use or distribution of this information could also be illegal and result in civil liability and/or criminal penalties.

您应当对保密和专有信息保密，除非并直至该等信息通过经批准的渠道（通常通过新闻稿、美国证监会备案或高级管理人员的正式通讯，如第14节所述，并符合我们单行的《公司披露政策》）向公众披露。每位员工均有义务不向任何人披露在雇佣过程中获知的



关于我们或任何其他公司的保密或专有信息，直到该等信息通过被批准的渠道向公众披露。本政策要求您避免与外界，甚至是公司内部其他员工讨论保密或专有信息，除非这些同事为了履行其工作职责有合法需求了解该等信息。未经授权使用或传播该等信息也可能违法，并导致民事责任和/或刑事处罚。

You should also take care not to inadvertently disclose confidential information. Materials that contain confidential information, such as memos, notebooks, mobile devices, computer disks and laptop computers, should be stored securely. Unauthorized posting or discussion of any information concerning our business, information or prospects on the Internet is prohibited. You may not discuss our business, information or prospects in any “chat room,” regardless of whether you use your own name or a pseudonym. Be cautious when discussing sensitive information in public places like elevators, airports, restaurants and “quasi-public” areas in and around our place of business. All Company emails, voicemails and other communications are presumed confidential and should not be forwarded or otherwise disseminated outside of the Company except where required for legitimate business purposes.

您也应该注意避免无意中泄露保密信息。您应妥善保存包含机密信息的材料，如备忘录、笔记本、移动设备、计算机磁盘和笔记本电脑。禁止未经授权在互联网上发布或讨论任何有关我们业务、信息或前景的信息。您不能在任何“聊天室”讨论我们的业务、信息或前景，无论您是使用自己的姓名还是化名。在电梯、机场、餐厅等公共场所以及我们营业场所及其周围的“准公共”区域讨论敏感信息时，请谨慎行事。公司的所有电子邮件、语音邮件和其他通信均被视为机密，除非出于合法业务目的的需要，不得转发或以其他方式向公司以外传播。

In addition to the above responsibilities, if you are handling information protected by any privacy policy published by us then you must handle that information in accordance with the applicable policy.

除上述责任外，如果您正在处理的信息受我们发布的任何隐私政策的保护，您必须根据适用政策处理该信息。

#### **14. Media/Public Discussions**

##### **媒体/公共讨论**

It is our policy to disclose material information concerning the Company to the public only through specific limited channels to avoid inappropriate publicity and to ensure that all those with an interest in the Company will have equal access to information. All inquiries or calls from the press and financial analysts should be referred to the Company’s Chief Executive Officer (the “**CEO**”), Chief Financial Officer (the “**CFO**”), General Counsel (the “**GC**”) or the investor relations department. We have designated our CEO, CFO, GC and investor relations department as our official spokespersons for financial, strategic, operational, regulatory, scientific, clinical, technical and other related information. Unless a specific exception has been made by our CEO, CFO, GC or investor relations department, these designees are the only people who may communicate with the press on behalf of the Company. You also may not provide any information to the media about us off the record, for background, confidentially or secretly.

我们的政策是仅通过特定有限的渠道向公众披露关于公司的重大信息，以避免不当宣传，并确保所有与公司利益相关的主体都能平等地获得信息。所有来自媒体和金融分析

师的询问或电话，应转交公司的首席执行官(“**CEO**”)、首席财务官(“**CFO**”)、法律总顾问(“**GC**”)或投资者关系部门。我们已指定我们的CEO、CFO、GC和投资者关系部门作为我们财务、战略、运营、监管、科学、临床、技术和其他相关信息的官方发言人。除非我们的CEO、CFO、GC或投资者关系部做出了特殊例外，否则这些指定人员是唯一可以代表公司与媒体沟通的人员。您也不得私下、保密或秘密地向媒体提供任何有关我们的信息。

We have adopted a separate Corporate Disclosure Policy with which you will be expected to comply as a condition of your employment with the Company. You should consult our Corporate Disclosure Policy for more specific information on the only authorized means of disclosing internal or nonpublic information about the Company to anyone outside of the Company.

我们已经制订了单行的《公司披露政策》，作为您受雇于公司的条件之一，您应遵守该政策。您应查阅我们的《公司披露政策》，以了解有关向公司以外的任何人披露公司内部或非公开信息的唯一授权方式的更多具体信息。

## **15. Waivers**

### **豁免**

Any waiver of this Code for executive officers (including, where required by applicable laws, our principal executive officer, principal financial officer, principal accounting officer or controller (or persons performing similar functions)) or directors may be authorized only by our Board of Directors or, to the extent permitted by the rules of The Nasdaq Stock Market and our Corporate Governance Guidelines, a committee of the Board of Directors, and will be disclosed as required by applicable laws, rules and regulations.

只有董事会，或在纳斯达克证券市场规则和我们的《公司治理准则》允许的范围内，由董事会的一个委员会授权，可以作出对于高级管理人员（包括在适用法律要求的情况下，我们的首席执行官、首席财务官、首席会计官或控制人（或履行类似职能的人员））或董事就本准则的任何豁免，并将根据适用法律、法规和规定的要求进行披露。

## **16. Compliance Standards and Procedures**

### **合规标准和程序**

#### *Compliance Resources*

#### *合规资源*

To facilitate compliance with this Code, we have implemented a program of Code awareness, training and review. We have appointed our Chief Financial Officer to the position of Compliance Officer to oversee this program. In the future, we may appoint another senior officer as the Compliance Officer. The Compliance Officer may also designate additional individuals to assist him or her in carrying out all duties of the Compliance Officer. The Compliance Officer and his or her designees, if any, can be reached at [compliance@personalis.com](mailto:compliance@personalis.com). The Compliance Officer is a person to whom you can address any questions or concerns. In addition to fielding questions or concerns with respect to potential violations of this Code, the Compliance Officer is responsible for:

为便于遵守本准则，我们实施了一项准则了解、培训和考核项目。我们已经任命我们的首席财务官为合规官，负责监督这一项目。今后，我们可能会任命另一名高级管理人

员担任合规官。合规官还可指定其他人员协助其履行全部职责。可通过 [compliance@personalis.com](mailto:compliance@personalis.com) 联系合规官及其指定人员（如有）。您可以向合规官提出任何问题或疑虑。除了处理与可能违反本准则有关的问题或疑虑，合规官还负责：

- investigating possible violations of this Code;  
调查可能违反本准则的行为；
- training new employees in Code policies;  
对新员工进行有关准则政策的培训；
- conducting annual training sessions to refresh employees' familiarity with this Code;  
每年举办培训课程，使员工重新熟悉本准则；
- distributing copies of this Code annually via email to each employee with a reminder that each employee is responsible for reading, understanding and complying with this Code;  
每年通过电子邮件向每位员工发送本准则，并提醒每位员工有责任阅读、理解和遵守本准则；
- updating this Code as needed and alerting employees to any updates, with appropriate approval of the Board of Directors or Audit Committee, as appropriate, to reflect changes in the law, Company operations and recognized best practices, and to reflect the Company's experience; and  
经董事会或审计委员会的适当批准，根据需要更新本准则并提醒员工注意任何更新，以反映法律、公司运营和公认最佳实践的变化，并反映公司的经验；以及
- otherwise promoting an atmosphere of responsible and ethical conduct.  
除此以外，形成一种负责任和有道德的行为氛围。

Your most immediate resource for any matter related to this Code is your supervisor. He or she may have the information you need or may be able to refer the question to another appropriate source. There may, however, be times when you prefer not to go to your supervisor. In these instances, you should feel free to discuss your concern with the Compliance Officer. If you are uncomfortable speaking with the Compliance Officer because he or she works in your department or is one of your supervisors, please contact the CEO or the Audit Committee. Of course, if your concern involves potential misconduct by another person and relates to questionable accounting or auditing matters under the Company's Whistleblower Policy, you may report that violation as set forth in such policy.

对于与本准则有关的任何问题，您最直接的资源是您的主管。他或她可能有您所需要的信息，或者可以将问题转给其他适当的人员。但是，有时您可能不愿意找您的主管。在这种情况下，您可以随时与合规官讨论您的问题。如果您因合规官在您的部门工作或是您的上级而不方便与之交谈，请联系CEO或审计委员会。当然，如果您的疑虑涉及其他人的潜在不当行为，并与公司的《举报政策》规定的可疑会计或审计事项有关，您可以根据该政策的规定举报该违规行为。

A toll-free compliance hotline at 1-855-696-6885, and [compliance@personalis.com](mailto:compliance@personalis.com), a dedicated email address, are available to those who wish to ask questions about Company policy, seek guidance on specific situations or report violations of this Code. You may call the toll-free number anonymously if you prefer as it is not equipped with caller identification, although the

Compliance Officer will be unable to obtain follow-up details from you that may be necessary to investigate the matter. Whether you identify yourself or remain anonymous, your telephonic or email contact with the compliance hotline will be kept strictly confidential to the extent reasonably possible within the objectives of this Code.

您可以拨打免费合规热线 1-855-696-6885，或通过 [compliance@personalis.com](mailto:compliance@personalis.com)（一个专门的电子邮件地址），来询问有关公司政策的问题、寻求有关特定情况的指导或报告违反本准则的行为。如果您愿意，您可以匿名拨打该免费电话，因为该号码没有配备来电识别功能，但合规官将无法从您那里获得调查此事所需的后续细节。无论您是表明身份还是保持匿名，您与合规热线的电话或电子邮件联系都将在本准则的目标范围内尽可能地严格保密。

*Clarifying Questions and Concerns; Reporting Possible Violations*  
*澄清问题和疑虑事项；报告可能的违规行为*

If you encounter a situation or are considering a course of action and its appropriateness is unclear, discuss the matter promptly with your supervisor or the Compliance Officer; even the appearance of impropriety can be very damaging and should be avoided.

如果您遇到某种情况或正在考虑采取某种行动，但不清楚其是否合适，请立即与您的主管或合规官讨论此事；即使是表面上的不当行为也会造成很大的损害，应予以避免。

If you are aware of a suspected or actual violation of Code standards by others, you have a responsibility to report it. You are expected to promptly provide a compliance resource with a specific description of the violation that you believe has occurred, including any information you have about the persons involved and the time of the violation. Whether you choose to speak with your supervisor or the Compliance Officer, you should do so without fear of any form of retaliation. We will take prompt disciplinary action against any employee who retaliates against you, including termination of employment.

如果您发现他人涉嫌或实际违反本准则标准，您有责任进行报告。您应立即向合规资源提供您认为已发生的违规行为的具体描述，包括您所掌握的有关相关人员和违规时间的任何信息。无论您是选择与您的主管还是合规官交谈，您都应该如此行事，且无需担心遭到任何形式的报复。我们将对任何对您进行报复的员工立即采取纪律处分，包括解雇。

Supervisors must promptly report any complaints or observations of Code violations to the Compliance Officer. If you believe your supervisor has not taken appropriate action, you should contact the Compliance Officer directly. The Compliance Officer will investigate all reported possible Code violations promptly and with the highest degree of confidentiality that is possible under the specific circumstances. Neither you nor your supervisor may conduct any preliminary investigation, unless authorized to do so by the Compliance Officer. Your cooperation in the investigation will be expected. As needed, the Compliance Officer will consult with legal counsel, the Human Resources department and/or Audit Committee. It is our policy to employ a fair process by which to determine violations of this Code.

主管必须立即向合规官报告对违反准则的任何投诉或发现。如果您认为主管没有采取适当的措施，则应直接与合规官联系。合规官将在特定情况下，以最高机密性及时调查所有报告的可能违反本准则的行为。除非获得合规官授权，否则您和您的主管都不得进行任何初步调查。我们期待您在调查中的配合。根据需要合规官将咨询法律顾问、人力资源

部和/或审计委员会。我们的政策是采用公正的程序来确定是否违反本准则。

With respect to any complaints or observations of violations that may involve accounting, internal accounting controls and auditing concerns, under the Company's Whistleblower Policy, the Compliance Officer shall promptly inform the Audit Committee, and the Audit Committee shall be responsible for supervising and overseeing the inquiry and any investigation that is undertaken. If a potential violation is reported via the confidential hotline or email address as provided under the Whistleblower Policy, the Audit Committee will be notified automatically and directly.

对于任何可能涉及会计、内部会计控制和审计问题的投诉或观察到的违规行为，根据公司的《举报政策》，合规官应及时通知审计委员会，审计委员会应负责督促和监督正在进行的任何调查和审查。如果根据《举报政策》所列的保密热线或电子邮件地址举报了潜在的违规行为，审计委员会将会自动、直接地得到通知。

If any investigation indicates that a violation of this Code has probably occurred, we will take such action as we believe to be appropriate under the circumstances. If we determine that an employee is responsible for a Code violation, he or she will be subject to disciplinary action up to, and including, termination of employment and, in appropriate cases, civil action or referral for criminal prosecution. Appropriate action may also be taken to deter any future Code violations.

如果任何调查表明可能发生了违反本准则的行为，我们将采取我们认为在此情况下的适当行动。如果我们确定某位员工对违反本准则负有责任，他或她将受到最高包括解雇的纪律处分，并在适当情况下采取民事行动或移交刑事起诉。我们还可能会采取适当的行动，以防止今后发生任何违反本准则的行为。

## **17. Changes; Annual Review**

### **修改；年度审阅**

Any changes to this Code may only be made by the Audit Committee and will be recommended to the Board of Directors for approval and effective upon approval by the Board of Directors. The Audit Committee will review and reassess the adequacy of this Code at least annually, and recommend to the Board of Directors any changes the Audit Committee determines are appropriate. All changes must be promptly disclosed as required by law or regulation.

对本准则的任何修改仅可由审计委员会作出，并将建议董事会批准，经董事会批准后生效。审计委员会将至少每年审阅一次本准则、重新评估其适当性，并向董事会建议审计委员会认为适当的任何修改。所有修改必须根据法律或法规的要求及时披露。

## **18. Website Disclosure**

### **网站披露**

This Code, as may be amended from time to time, shall be posted on the Company's website. The Company shall state in its annual proxy statement that this Code is available on the Company's website and provide the website address as required by law or regulation.

本准则（可能不时修订）应在公司网站上公布。公司应在其年度委托书说明本准则可在公司网站上查阅，并按法律、法规要求提供网站地址。