



CODE OF BUSINESS CONDUCT AND ETHICS

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MESSAGE FROM CEO

Dear Colleagues,

At Fulgent, our mission is to develop flexible and affordable diagnostics and therapeutics that improve the everyday lives of those around us. Our ability to deliver excellent services to the clients and communities we serve depends on doing business in an ethical and compliant manner. Our employees are at the heart of what we do; and together, we must strive to always act with integrity.

Our Code of Conduct serves as a guide to ensure that our work is done in an ethical, legal, and compliant manner. It provides resources to help our employees, team members, and leaders to resolve questions about workplace conduct. The Code of Conduct also offers examples, identifies our standards, and highlights challenges facing our industry. I hope you will find the guidance in this Code clear and helpful.

I ask you to carefully read and understand our Code of Conduct, comply with its standards, associated policies and procedures, and ask questions.

It is everyone's responsibility to prioritize, adopt, and adhere to our Code of Conduct. If you have any questions, please reach out to your leaders or to the Compliance team. And if you have concerns or become aware of any actual or potential misconduct, you have the responsibility to speak up, act, or submit a report through our hotline and web portal.

Let's do our best work every day, knowing that we perform at our best together. Thank you for your commitment to our mission and to upholding Fulgent's reputation in the healthcare and life sciences community.

A handwritten signature in black ink, appearing to read "Ming Hsieh".

Ming Hsieh
Chairman and CEO of Fulgent

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I. Policy Statement

It is the policy of Fulgent Genetics, Inc. (“we”, the “Company,” or “Fulgent”) to conduct its affairs in accordance with applicable laws, rules, and regulations of the jurisdictions in which it does business. This Code of Business Conduct and Ethics (“Code”) applies to the Company’s employees, officers, and non-employee directors or board members (together, “Covered Persons”), including the Company’s principal executive officer, principal financial officer, principal accounting officer or controller, and persons performing similar functions (“Designated Executives”). This Code also applies to our independent contractors, vendors, and suppliers and serves as a guide for our day-to-day activities. This Code is the Company’s “code of ethics,” as defined in Item 406 of Regulation S-K. It sets forth standards for behavior that affect the Company. We expect all Covered Persons to read, become familiar with, and comply with the ethical standards described in this Code. The most current version of this document is available at www.fulgentgenetics.com.

This Code helps us promote:

- Honest and ethical conduct, including the ethical handling of actual or apparent conflicts of interest with respect to personal and professional relationships.
- Full, fair, accurate, timely, and understandable disclosure in public communications and in the reports and documents the Company files with, or submits to, the Securities and Exchange Commission.
- Compliance with applicable governmental laws, rules, and regulations.
- Prompt internal reporting to the appropriate person of violations of this Code.
- Accountability for adherence to this Code.

While this Code covers a wide range of business practices and procedures, it is not intended to be a comprehensive guide to all our policies or all your responsibilities, and it may not address all situations that arise. Rather, this Code sets out basic principles to help you resolve the ethical and legal issues that you may encounter in conducting our business. As such, this Code serves as a set of guidelines or minimum requirements. Where additional guidance is necessary, we have developed a comprehensive set of policies and procedures, available on the Company’s intranet. Those policies elaborate on and supplement many of the principles in this Code. These tools can empower you to make good decisions, and this Code can also point you in the direction of additional options if the answer is not clear. If a law conflicts with a provision of this Code, you must comply with the law. However, if a local custom or practice conflicts with this Code, you must comply with the Code. If you have any questions about these conflicts or questions relating to the policies or application of the Code, direct them to the Compliance Officer. And if you are aware of a potential Code violation, please follow the guidelines under “Reporting Procedures,” below.

II. Fulgent's Mission and Values

Fulgent, along with its subsidiaries and affiliates, is committed to providing quality clinical testing services to our customers while observing the highest standards of legal and business ethics. We conduct our business with honesty, integrity, and respect for our valued team members, patients, clients, vendors, shareholders, and communities.

Our mission is to develop and offer flexible and affordable diagnostics and therapeutics that improve the everyday lives of those around us. We keep our clients and their patients at the forefront of everything we do. Our priority is to manage testing with speed, precision, and care; while only performing testing that is medically necessary and clinically significant. We embrace a culture that prioritizes high quality and personalized diagnostic testing, and our commitment to our clients and the patients we serve is to operate with the highest professional standards in our laboratories. As a recognized national laboratory industry leader in quality, service, and technology, we follow both the letter and spirit of applicable federal and state laws and regulations. Compliance is critical to the Company and differentiates us as an industry leader.



Innovation

By merging the fields of genetics, molecular biology, and computer science, we pursue excellence in clinical diagnostics, therapeutic development, and data analysis.



Customer Service & Commitment

Our dedicated team of customer support staff is available to answer questions quickly and accurately, so physicians can spend more time with what's really important: their patients.



Quality & Efficiency

As a CLIA-certified and CAP-accredited lab, quality controls are built into our procedures at every step, and multiple lab directors oversee all clinical procedures and analysis.



Our People

We support our employees by providing them with resources for personal and professional growth while fostering an inclusive culture where differences are celebrated.

III. Reporting Procedures

1. How to Report Concerns

If you are aware of actual or potential wrongdoing, misconduct, violations of the Code; or violations of applicable policies, procedures, laws, rules, or regulations, you must promptly and in good faith report the matter to any of the following:

- Your manager, HR representative, Compliance Officer, or General Counsel.
- Compliance Hotline, at **1-844-787-9172** (you have the option to report anonymously).
- Compliance Web Portal, at <https://app.mycompliancereport.com/report?cid=INFO> (you have the option to report anonymously).
- For concerns relating to Fulgent’s accounting, internal accounting controls, or auditing matters, you may confidentially and anonymously (if you choose) submit them to the ComplianceLine Hotline number or Web Portal indicated above.

2. What to Include in Your Report

When submitting concerns, please provide as much detailed information as possible. Providing detailed information will assist us in effectively investigating complaints. This is particularly important when you submit a complaint on an anonymous basis, since we may be unable to contact you with requests for additional information or clarification. If you submit your concerns anonymously, please provide details in a manner that does not inadvertently disclose your identity (e.g., refer to “John Smith” rather than “my supervisor, John Smith”).

3. What Happens After a Report Is Made

We are providing these anonymous reporting procedures so that you may disclose genuine concerns without feeling threatened. We also prohibit retaliation against employees who choose to identify themselves when submitting a report in good faith. We take measures to keep confidential the identities of employees who choose to identify themselves when submitting reports. Employees who identify themselves may be contacted to gain additional information.

All conversations, calls, and reports made under this policy in good faith will be taken seriously. Any allegations that are knowingly false or without a reasonable belief in the truth and accuracy of such information will be viewed as a serious disciplinary offense.

No matter who you contact or how you report it, your concern will be promptly reviewed, and, if appropriate, investigated by the team with the appropriate subject matter expertise. Information you provide will only be shared with the people who need to know it in order to resolve the issue. If the concern is substantiated, an executive-level recommendation will be made as to what, if any, disciplinary action will be taken. In the reporting platform you may choose the option to check back

(anonymously or not) to review the resolution or to learn whether the claim was substantiated or not. Unless you check back via the options provided on the reporting platform, we may not be able to provide you with an update regarding your anonymous report.

Find out more: *Hotline and Reporting Policy and Procedure, Whistleblower Policy.*

IV. Code Approvals and Waivers

Certain provisions of this Code require you to act, or refrain from acting, unless prior approval is received from the appropriate person. Employees requesting approval pursuant to this Code should request such approval from the Compliance Officer. Approvals relating to executive officers and directors must be obtained from the Company's Board of Directors. All other approvals may be granted by the Compliance Officer or their designee.

Other provisions of this Code require you to act, or refrain from acting, in a particular manner and do not permit exceptions based on obtaining an approval. Waiver of those provisions relating to executive officers and directors may only be granted by the Board, and waivers relating to executive officers and directors must be promptly disclosed to shareholders.

Changes in this Code may only be made by the Board and must be promptly disclosed to shareholders. In some situations, it may not be clear whether a provision of the Code is intended to apply to particular conduct. In such situations, the Board and General Counsel have full power and authority to interpret the Code. A determination that the Code was not intended to apply to specific conduct shall not be deemed to be a waiver of the Code's prohibitions.

V. Our Leaders and Our Board

Company leaders have a great deal of responsibility and influence. We rely on you as a leader to model the behaviors and actions below:

- Act as a role model and demonstrate ethical conduct, as reflected in this Code.
- Communicate employee adherence to the Code and their responsibilities.
- Foster an environment in which employees feel comfortable coming to you with questions and concerns.
- Document, report, and escalate concerns appropriately.
- Do not retaliate against employees who raise a concern.
- Encourage and recognize ethical decision-making and acts of integrity.
- Help ensure employees have completed all Company required training.

Members of our Board of Directors are likewise responsible for compliance and oversight of the issues and responsibilities outlined in this Code. This Code guides the behavior of our Board Members their decision-making and other activities, holding them accountable for the decisions and choices they make. Additionally, this Code confirms that Board Members have a role in and oversight responsibilities in connection with approvals; exceptions; decision-making authority; and escalated concerns, reports, and issues, as outlined in this Code.

VI. Our Employees

1. Employees' Responsibilities

This Code is intended to clarify your existing obligation for proper conduct. This document is not an employment contract between Fulgent and its employees, and it does not modify your employment relationship with the Company. The standards and the supporting policies and procedures may change from time to time in the Company's discretion. You are responsible for knowing and complying with the current laws, regulations, standards, policies, and procedures that apply to your work.

Any employee who violates the provisions of this Code will be subject to disciplinary action, up to and including termination. Willful disregard of criminal statutes underlying this Code may require the Company to refer such violation for criminal prosecution or civil action.

Questions regarding the policies in this Code may be directed to the Compliance Officer. Managers and supervisors are also resources who can provide timely advice and guidance to employees on ethics and compliance concerns; and they are expected to and must promptly report any concerns brought to their attention in their supervisory capacity to the Compliance Officer. Any employee having knowledge of, questions, or concerns about an actual or possible violation of this Code must promptly report the matter either to their immediate supervisor or to the Compliance Officer. Failure to report any known concerns will be considered a direct violation of this Code and will be subject to disciplinary action as stated above, up to and including termination.

2. Policy Prohibiting Unlawful Retaliation or Discrimination

Our employees are our greatest asset, and our leaders must model ethical leadership and foster an environment where employees feel comfortable raising questions and concerns. We do not allow any form of retaliation against anyone who reports a concern in good faith or cooperates in an investigation. All employees, officers, and directors of the Company are bound by and must comply with all provisions of this Code and of the Company's Whistleblower Policy. The Company and managers may not discharge, demote, suspend, threaten, harass, or discriminate against any employee based upon their good-faith reporting of actual or potential violations. For example, this Code prohibits adverse employment action against anyone who: (i) provides information or assists in an investigation of conduct, which the employee reasonably believes constitutes a violation of Fraud Laws (as defined below); (ii) files, testifies, participates in, or otherwise assists with a proceeding (with

any knowledge of the Company) relating to an alleged violation of Fraud Laws; (iii) provides truthful information to a law enforcement officer relating to the commission or possible commission of a criminal offense; or (iv) engages in any other conduct protected by law.

This policy applies in any instance where such information or assistance is provided to, or the investigation is conducted by, a federal regulatory body or law enforcement agency, Congressional member or committee, or any person with supervisory authority over the employee or the authority to investigate misconduct relating to potential securities violations by the Company or its employees. For purposes of this policy, "Fraud Laws" refer to a violation of federal criminal law involving: (i) securities, mail, bank, wire, radio, or television fraud; (ii) violations of SEC rules or regulations; or (iii) violations of any federal law relating to fraud against shareholders.

3. Asking Questions and Raising Concerns

If you are faced with an ethical dilemma and not sure what to do, ask yourself:



If your answer to any of these questions is "NO." Don't do it. Seek further guidance.

4. Employee Education and Training

We want to equip our employees with the knowledge and training needed for them to be successful in their job roles. We are committed to training our employees on topics that will enable them to perform their job functions safely and compliantly. Courses on issues outlined in this Code including, without limitation, Compliance, the Health Insurance Portability and Accountability Act (HIPAA), Fraud, Waste and Abuse, Anti-Harassment, Conflicts of Interest, Anti-Bribery and Corruption, Insider Trading, Privacy laws, Security Awareness, and Safety are mandated annually. Additionally, all employees are expected to carefully read this Code and to affirm that they read, understood, and will adhere to the Code.

Find out more: *Training Policy*.

5. Acceptance of Gifts and Entertainment

Gifts and entertainment in a business setting may not be used in an illegal or unethical manner or create potential conflict of interest. Courtesies and gifts may be accepted if they are:

- Legal
- Not cash or cash equivalent (gift card)
- Are of nominal value (< \$100)
- Are offered in a transparent manner and have a business purpose.

Modest or customary forms of hospitality, such as lunches or dinners and occasional gifts of minimal value, typically do not influence clinical or business decisions. Although it is difficult to define “customary” or “modest,” the best approach is to exercise good judgment. If you are offered anything that is more than nominal in value, you must consult our policies, your manager, HR, or Compliance Department.

Employees may not accept loans from any persons or entities having or seeking business with the Company. Designated Executives and directors may not receive loans from the Company, nor may the Company arrange for any loan.

6. Payments of Bribes and Kickbacks

Bribes and Kickbacks are likewise prohibited. All employees, officers, and directors of the Company are bound by and must comply with all provisions of the Company’s Anti-Corruption Compliance Policy. The use of Company funds, facilities, or property for any illegal or unethical purpose is strictly prohibited. You are not permitted to offer, give, or cause others to give, any payments or anything of value for the purpose of influencing the recipient’s business judgment or conduct in dealing with the Company. You may not solicit or accept a kickback or bribe, in any form, for any reason. You are also prohibited from giving payments, gifts, or other compensation to influence the outcome of a third party’s decisions as it may be seen as inducement. Nominal gifts (such as Company branded mugs, pens, cups) may be permitted, such as for Laboratory Professionals Week, for certain clients. However, please confirm with the Compliance department before giving any gifts, of any value, to our clients.

* * *

Question: A vendor wants to take me to lunch. Can I attend?

Answer: Yes, so long as the invitation is reasonable, open, transparent, is moderately priced and not intended to influence or appear to influence your business decisions. Be clear with the vendor about our policy limitations on acceptable meals and entertainment.

Question: A vendor sent me a gift basket filled with sweets. Can I accept it?

Answer: You can accept small gifts of modest value. However, if the gift is such that the vendor or

supplier might think the gift can influence or interfere with your decision-making, use good judgment in whether you accept it, and talk to your manager.

Find out more: *Anti-Corruption Compliance Policy*.

7. Background and Exclusion Checks

As an employee, you were subject to a background check upon hire. Subsequently, the Company performs monthly exclusion searches to ensure no employee is ineligible to participate in government-funded programs such as Medicare or Medicaid. If an employer is found to employ an individual who is on a federal or state sanctioned list, they can be fined and penalized. You must immediately disclose any sanction or exclusion (or other event, such as loss of licensure), that makes you ineligible for participation in the above-mentioned programs.

Find out more: *Oversight and Monitoring of OIG and Other Exclusion Lists Policy*.

8. Conflict of Interest

A conflict of interest arises when your personal interests interfere with your ability to act in the best interests of the Company. Employees must discharge their responsibilities based on what is in the best interest of the Company, independently of personal consideration or relationships. Non-employee directors must discharge their fiduciary duties as independent directors of the Company.

A conflict of interest can also arise because of the business activities of your close relations. For example, an employee may have a potential conflict of interest whenever a close relative has a significant relationship with, or has a significant financial interest in, any supplier, customer, or competitor. An employee may not make or attempt to influence any Company decision that could directly or indirectly benefit their close relative. To protect the employee and the Company from the appearance of a conflict of interest, the employee should make appropriate disclosure to the Compliance Officer or their designee.

We must avoid situations that present potential or perceived conflicts of interest between our personal interests and those of Fulgent. Placing our personal, social, financial, or political interests before the interests of the Company can give rise to a conflict of interest. Many such conflicts can be resolved, but the first step is to disclose potential conflicts to your manager, HR, or Compliance.

Some examples of potential conflicts of interest include:

- Concurrent employment, including employment with a competitor or potential Fulgent customer or supplier.
- Investing in a Fulgent supplier.
- Having a family member that owns or works for a supplier that Fulgent might use, even if you do not have decision-making authority.
- Receiving an expensive gift from a business associate or supplier of Fulgent, or someone who is seeking to work with Fulgent.

- Serving on a board of a company, including a local non-profit in the healthcare industry, without having disclosed this information to your supervisor or the Compliance Officer before agreeing to serve.
- Otherwise taking advantage of Fulgent’s corporate opportunities for personal gain.

Employees should disclose any potential conflicts of interest to the Compliance Officer or their designee, who can then advise the employee as to whether the Company believes a conflict of interest exists. An employee should also disclose potential conflicts of interest involving the employee’s spouse, siblings, parents, in-laws, children, and members of the employee’s household. Non-employee directors may discuss any concerns with the Compliance Officer or General Counsel.

* * *

Question: I am part of the decision-making team for a new supplier, and my brother-in-law works for one of the companies we are considering. His company has a great track record in terms of on-time delivery and the best rates so far. Is it OK for me to recommend the company, since I think it will be in the best interest of Fulgent?

Answer: You need to disclose the relationship. It would be best for you to eliminate the conflict of interest by removing yourself from the decision-making team, so there is no perception of improper or unfair conduct.

9. Activities Outside the Company

Although Fulgent has no interest in preventing employees from engaging in lawful activities during nonworking hours, employees must ensure that their outside activities do not conflict or interfere with their responsibilities to the Company. For example, without approval by the Company, a Fulgent employee generally may not:

- Engage in self-employment or perform paid or unpaid work for others in the line of business in which the Company operates.
- As a full-time Company employee, have a second job of which the Company is unaware.
- Use proprietary or confidential Company information for personal gain or to the Company’s detriment.
- Use Company assets or labor for personal use, except for incidental use permitted under the Company’s policies.
- Acquire any interest in property or assets of any kind for the purpose of selling or leasing it to the Company.

10. Relationships with Our Competitors

Employees should avoid even the appearance of a conflict of interest in their relationships with competitors of the Company. Without approval, employees may not:

- Make or maintain a financial investment in a competitor, except for investments in publicly traded corporations not exceeding 1% of the outstanding common stock.
- Provide compensated or uncompensated services to a competitor, except for services rendered pursuant to under a valid Fulgent contract with the competitor.
- Disclose any Company proprietary information to a competitor, unless a Company nondisclosure agreement with such competitor is in place, and the disclosure takes place consistent with such agreement.
- Utilize for any unauthorized purposes or disclose to a competitor or other third-party any proprietary data that has been entrusted to the Company by a customer or supplier.

11. Usurping Corporate Opportunities & Resources

You may not use corporate property, resources, information, or position for personal gain. Without prior approval, you are prohibited from taking for yourself personal opportunities that are discovered using corporate property, resources, information, or position. No employee may compete with the Company, directly or indirectly, except as permitted by Company policies or approved by the Compliance Officer. All employees should protect the Company's assets and ensure their efficient use. Theft, carelessness, and waste have a direct impact on the Company's profitability. All Company assets should be used for legitimate business purposes.

12. Privacy, Security, and Protection of Confidential Information

You must maintain the confidentiality of information entrusted to you by the Company or its customers, suppliers, employees, or other persons except when disclosure is authorized or legally mandated. Confidential information includes all non-public information, including information that might be of use to competitors or harmful to the Company or its customers if disclosed. The Company expects all its employees to educate themselves about and be alert to threats to security of confidential information entrusted to the Company and its employees.

Confidential information within the Company's possession falls into three general categories: (1) confidential proprietary information about the Company's business, including but not limited to trade secrets, other proprietary information, and information which may be patentable ("Proprietary Information"); (2) confidential information entrusted to the Company by third parties such as customers (including the U.S. government and its agencies), suppliers, or other third parties ("Third Party Information"); and (3) personally identifiable information received from employees, customers, suppliers, or other third parties (including but not limited to names, addresses, Social Security Numbers, background information, credit card or bank information, telephone or facsimile numbers, e-mail addresses and personal health information) ("Personal Information") which, if compromised or misused, could result in identity theft, credit card fraud or other serious harm, or violations of law.



Personal Information of employees, agents, contractors, subcontractors, suppliers, customers, physicians, providers, and patients may be subject to protection under international or U.S. federal, state, or local laws. No Personal Information may be transmitted from one country to another without prior managerial approval. No Personal Information may be disposed of, except pursuant to the Company's approved methods of disposal, as outlined in the Document Retention Policy. Each employee is responsible for the privacy and security of Personal Information and should be familiar with relevant policies and procedures.

Any Covered Persons with questions about how to appropriately handle or dispose of Proprietary, Third Party, or Personal Information should immediately bring their questions to the attention of management or the Compliance Officer before taking any action with respect to such information.

Our Company respects the privacy rights of those we work with, including employees, patients, clients, and vendors. The protection of this privacy and the security measures we implement to maintain it are paramount to our conduct of business and are key to maintaining trust in our business relationships.

We adhere to the privacy and protection laws applicable to our Company such as HIPAA, the European Union General Data Protection Regulation (GDPR), the California Consumer Protection Act (CCPA), and other similar laws. Protected Health Information (PHI) within our systems is collected, processed, stored, and transferred with the reasonable and appropriate precautions and safeguards to protect confidentiality. You may only access PHI with specific authorization and only access the minimum amount necessary for you to do your job. Any unauthorized access, use, or disclosure of PHI is strictly prohibited.

You are required to protect the security of any PHI (or other personal data) over which you have control or access. In addition, you are required to know, understand, and adhere to the information security policies specific to your entity for the use, disclosure, transfer, and preservation of such data. This also includes participation in and completion of all assigned security training.

If you become aware of a potential security incident that may involve unauthorized access, use, or disclosure of confidential information or unavailability of systems or applications, you must immediately report to the IT Department through: ITSecurity@fulgentgenetics.com.

All employees, including officers and directors, must preserve the confidential information entrusted to us by the Company, our clients, and suppliers, unless disclosure is required by law. Confidential information includes all non-publicly available information from the Company that may be useful to competitors or harmful to the Company, clients, or suppliers if disclosed. This obligation to maintain confidentiality continues even after your employment with the Company ends.

- We should always:
 - Protect our digital assets with strong passwords.
 - Lock our computer screens when we are away from our workstations.
 - Be wary of suspicious-looking emails, emails from unknown senders, or requests that are outside of our normal business operations.
 - Immediately report any lost, damaged, or stolen IT equipment, including laptops and phones, to the IT department (contact information listed above).
- We should never:
 - Share our user ID or password, or store passwords where they can be accessible.
 - Open links or respond to emails that look suspicious.
 - Use unauthorized or unapproved software without checking first with IT.
 - Use ChatGPT or other similar AI programs without checking first with IT.
 - Share or store Company information on unauthorized platforms (remember to stick to approved tools such as Microsoft Teams, Outlook, and OneDrive).

Find out more: *Fulgent HIPAA Compliance Program, Information Security Program, General Data Protection Regulation Policy, Fair Disclosure Policy.*

13. Respect for Each Other

Protecting and supporting human rights, including, without limitation, the rights of women and minority groups, is our fundamental responsibility as an employer. This responsibility extends across our enterprise on a global basis. The diversity of the Company's employees is a tremendous asset, and we are firmly committed to providing equal opportunity in all aspects of employment and do not tolerate discrimination, harassment, or retaliation. We prohibit discrimination in employment, employment-related decisions, and in business dealings on the basis of an individual's race, color, national origin, ancestry, nationality, citizenship, religion, creed, age, sex (including pregnancy), marital or familial status, sexual orientation, gender identity and/or expression, military service/veteran status, disability, matriculation, political affiliation, genetic information, immigration status, or any characteristic protected by applicable law (hereafter collectively referred to as "protected status"). We are also committed to providing fair and equitable wages, benefits, and other conditions of employment in accordance with local laws; and we support a work environment that is free from human and sexual trafficking, forced and bonded labor, and unlawful child labor. In support of our commitments to a fair, equitable, and free workplace, we provide regular training to employees.

In addition, we strive to provide each employee with a safe and healthy work environment. All managers must ensure proper safety and health conditions for employees. Everyone must help maintain a safe and healthy workplace, by following health and safety rules and practices and by

reporting accidents; injuries; and unsafe equipment, practices, or conditions. Threats, acts of violence and physical intimidation are strictly prohibited. We do not tolerate any talk of violence or joking about violence. As is the case with any violation of the Code, employees have a responsibility to report any unsafe behavior or condition, regardless of whether they were directly involved or merely witnessed it.

We are committed to creating a culture of respect and fair and non-discriminatory treatment of all employees and potential employees. We do not tolerate any form of harassment, retaliation, or intimidation. Everyone should be treated with dignity and respect. Harassment can take many forms, including:

- Racial, ethnic, gender identity, sexual orientation, or religious slurs and insensitive terms.
- Offensive comments and jokes.
- Inappropriate behavior in verbal, physical, visual, or written form.
- Degrading or inappropriate comments about an individual's age, religion, race, ethnicity, sexual orientation, or gender identity.
- Intimidating or threatening behavior.
- Bullying and cyberbullying.
- Displaying materials that show hostility toward a person or group.
- Unwelcome sexual advances, remarks, or requests for sexual favors, including to anyone over whom an individual maintains a position of influence.

It's still harassment if:

- It happens on or off the clock
- It involves members of the same or opposite sex
- It happens on or off Company property
- It is committed by a vendor or customer
- It takes place on social media, email, or text

Remember that a positive and respectful workplace enables people to do their best work, without fear or intimidation. Each of us, at every level and location where we operate, has an obligation to put a stop to all types of harassment. Harassment is hostile, and offensive conduct that can interfere with someone's ability to work and can create a toxic environment.

If you see or experience disrespectful or inappropriate behavior and it feels safe to do so, tell the

person to stop. If you are uncomfortable talking to the person directly, report the conduct to your manager, HR, the Compliance Officer, or Compliance hotline. Managers who receive a report or become aware of harassment must also report it further up the chain.

Always remember to do the right thing. The Company prohibits retaliation against anyone making a report with a good-faith concern.

14. Diversity and Inclusion

As an equal opportunity employer, we are committed to fair and non-discriminatory treatment of all employees and potential employees. All applicable laws and regulations governing equal opportunity employment must be followed, and employees and managers who violate these laws are subject to disciplinary action, up to and including termination. We empower all employees to do their best work by valuing diverse backgrounds and ideas. Our inclusive culture is fostered by:

- Recruiting and retaining qualified individuals from a broad range of backgrounds
- Being transparent in actions and communications
- Encouraging different points of view
- Treating everyone with respect and dignity

15. Workplace Safety and Health

Safety is everyone's responsibility. We follow applicable safety laws and regulations, and anyone who violates them may be subject to disciplinary action and potential legal liability. The Company is committed to promoting a safe and healthy work environment, to establishing policies and procedures that support the safety program, and to fostering a workplace that is free from hazards, substance abuse, and violence. If you have a concern about potentially unsafe or unhealthy conditions or activities, you must report them immediately.

If you answer "Yes" to any of the following questions, you must speak up:

- Did we fail to follow written procedures?
- Did an injury occur at the workplace?
- Are there workplace hazards?
- Have you witnessed unsafe practices?
- Is there damaged or unsafe equipment?
- Did someone fail to use protective equipment or used faulty equipment?

Find out more: *Injury and Illness Prevention Program*.

16. Use of Company's Property

Company assets are valuable and must be protected. We each have a duty to use these assets properly and protect them from misuse. Employees may not use corporate property or information for personal gain. When we effectively manage our assets, we comply with the law, safeguard our investments, and protect our shareholders' interests.

Fulgent provides various technology resources (including computers, telephones, software, copying machines, Internet access, and voice mail) to you to assist in performing your duties on behalf of the Company. You have the responsibility to use the Company's technology resources in a manner that complies with applicable laws and Company policies.

- **Authorization.** Access to the Company's technology resources is within the sole discretion of the Company and subject to Company policies. Generally, employees are given access to the Company's various technologies consistent with their job functions. The Company reserves the right to limit such access by any means available to it, including revoking access.
- **Prohibition Against Violating Copyright Laws.** You may not use the Company's technology resources to copy, retrieve, forward, or send copyrighted materials unless you have the author's permission or are accessing a single copy only for your own reference.
- **Other Prohibited Uses.** You may not use any of the Company's technology resources for any illegal purpose, in violation of any Company policy, in a manner contrary to the best interests of the Company, in any way that discloses Proprietary Information, Third Party Information, or Personal Information on an unauthorized basis, or for personal gain.

Regarding personal use of company assets, we recognize that employees may occasionally desire to use Company systems for personal tasks during their normal course of business, including non-work web browsing or emails from personal accounts. Occasional personal use is permitted; however, the Company reserves the right to monitor personal use of company assets to the same extent that it monitors business use. Employees must operate under the assumption that all traffic over company networks is monitored and must conduct themselves accordingly. Additionally, employees who choose to use their personal cellphones for work-related purposes understand and agree that all such communications are Company's property and are subject to monitoring and access by the Company.

Examples of Assets:

Physical assets:	Electronic assets:	Financial assets:	Intangible assets:
<ul style="list-style-type: none"> • Land • Buildings • Equipment • Furnishings • Supplies 	<ul style="list-style-type: none"> • Network and other technical environments • Data stored on company systems and servers • Computer software and applications • Computers and other devices (e.g., laptops) 	<ul style="list-style-type: none"> • Cash or cash equivalents • Equity investments 	<ul style="list-style-type: none"> • Our brands • Our reputation • Confidential information • Intellectual property, including patents, trademarks, copyrights, and trade secrets • Information related to Company business, such as client lists, business strategy, or market research

Find out more: *Employee Monitoring Policy, Information Security Program.*

17. Record Keeping and Retention

The success and integrity of our business depends on accurate information. To ensure we operate our business honestly and ethically, we must keep timely and precise records. This is required by law, and our executive leadership and board members must always have a complete and accurate view of the Company operations so they can make informed decisions. Our commitment to internal accounting controls applies to financial and non-financial reporting.

You are responsible for the accuracy of your records, time sheets, and reports. Accurate information is essential to Fulgent’s ability to meet legal and regulatory obligations and to compete effectively. Fulgent’s books and records meet the highest standards and accurately reflect the true nature of the transactions they record. Destruction of any records, books, or other documents except in accordance with Fulgent’s document retention policy is strictly prohibited.

You must not create false or misleading documents or accounting, financial, or electronic records for any purpose relating to Fulgent; and no one may direct an employee to do so. For example, expense reports must accurately document expenses actually incurred in accordance with Fulgent policies.

You must not obtain or create “false” invoices or other misleading documentation or invent or use fictitious entities, sales, purchases, services, loans, or other financial arrangements for any purpose relating to Fulgent. Employees are also responsible for accurately reporting time worked.

No undisclosed or unrecorded account or fund may be established for any purpose. No false or misleading entries may be made in the Company’s books or records for any reason. No disbursement of corporate funds or other corporate property may be made without adequate supporting documentation or for any purpose other than as described in the documents. All employees must ensure compliance with generally accepted accounting principles and must comply with the Company’s internal controls at all times.

Examples of records include:

- Employee records
- Lab records
- Expense reports
- Claims
- Invoices
- Contracts
- Financial reports

We should ALWAYS:

Record and report honest, complete, and accurate information

We should NEVER:

Report information that misleads or misinforms the people who receive it

We also adhere to laboratory retention requirements as specified in federal and state laws and by our accrediting agencies for patient specimens, samples, and patient-related records. These records hold the same accountability of accuracy and completeness.

Find out more: *Record Retention Policy, Records and Sample Retention Policy.*

18. Protecting Our Reputation and Social Media

We safeguard Fulgent’s reputation and values by communicating responsibly. Our expectation is that employees and business partners are professional, accurate, and truthful in all communications. Only individuals authorized to represent Fulgent and its subsidiaries in the media are allowed to communicate publicly. If you receive outside inquiries, they must be forwarded to Fulgent Management.

We respect your right use to social media; however, you must follow applicable policies. Be aware that your comments on social media could affect the reputation of the Company; and never present your personal view as those of Fulgent’s or disclose non-public or confidential information.

Find out more: *Social Media Policy.*

19. Regulatory Compliance

We operate in a highly regulated environment. The agencies that regulate our business include the Food and Drug Administration, the Securities and Exchange Commission, the Office of Inspector General, plus many other international, federal, state, and local agencies. The Company and its employees must comply with the regulatory requirements of all these agencies, as well as all applicable laws. Employees are expected to take an active role by being knowledgeable about, attending trainings relating to, and requesting information about all applicable laws and regulations, including, without limitation, the federal Food and Drug Administration Act, the Protecting Access to Medicare Act of 2014, the Anti-Kickback Statute, the Stark Law, the Health Insurance Portability and Accountability Act of 1996, the Health Information Technology for Economic and Clinical Health Act, the Patient Protection and Affordable Care Act, and the European Union General Data Protection Regulation. Employees are required to immediately report regulatory violations, suspected regulatory violations, data incidents or suspected data breaches, or potentially harmful or dangerous conditions to the Compliance Officer or General Counsel.

20. Truthful and Accurate Billing for Our Services

We are committed to submitting accurate claims for our laboratory testing services, not only to government healthcare programs and other third-party payor services, but also to all our customers. We timely correct identified billing errors, make appropriate refunds as needed, and conduct regular auditing and monitoring to ensure we are compliant with laws, regulations, policies, and procedures.

Through the U.S. federal False Claims Act (FCA) and various state and international laws, we uphold the prohibition on submitting false or fraudulent claims, which can bring civil, criminal, and administrative penalties. In addition, the FCA allows individuals to file lawsuits on behalf of the U.S. government for violations of the law (known as qui tam or whistleblower actions). Protection is provided to these individuals, and we enforce this non-retaliation policy for those who bring actions or issues to our attention in good faith.

21. Government Investigations

It is the policy of the Company to cooperate with all government investigations. You must promptly notify counsel of any government investigation or inquiries from government agencies concerning Fulgent. You may not destroy any record, books, or other documents relating to Fulgent except in accordance with the Company's document retention policy. If you are aware of a government investigation or inquiry, you may not destroy any record, books of account, or other documents relating to Fulgent unless advised by the Compliance Officer or General Counsel that you may continue to follow the Company's normal document retention policy.

You must not obstruct the collection of information, data, or records relating to Fulgent. The Company provides information to the government that it is entitled to during an inspection, investigation, or request for information. You must not lie to government investigators or make misleading statements in any investigation relating to Fulgent. You must not attempt to cause any employee to fail to provide accurate information to government investigators. Employees have the

right to consult their own legal counsel at their own expense.

Find out more: *Record Retention Policy*.

22. Government Contracting

Detailed laws and regulations govern virtually every aspect of doing business with the U.S. government and its agencies. Activities that might be permitted when working with the private sector may be improper or even illegal when a national or local government is the customer. Fulgent employees should seek to adhere to the highest standards of honesty and integrity in their relations with government officials and employees. For example, employees should observe the following principles when bidding or performing government contracts:

- Do not offer or provide meals, transportation, gifts, or other consideration to government employees, except as permitted under applicable law and Company policy.
- Obey the regulations governing current and post-government employee conflicts of interests.
- Obtain all appropriate government approvals prior to recruiting or hiring current or former government employees.
- Obtain appropriate licenses prior to exporting or even discussing certain technologies with citizens of other countries.
- Obey any requirements that may restrict access to source selection or competitive information.

Fulgent employees who deal with government representatives are responsible for knowing and obeying the laws and regulations applicable to doing business with the U.S. government. Covered Persons have a responsibility and are encouraged to talk to the Compliance Officer if they do not understand the above guidelines.

VII. Our Clients

1. Our Commitments to Our Clients

Fulgent seeks to outperform its competition fairly and honestly. The Company seeks competitive advantages through superior performance, not unethical or illegal business practices. Each employee must endeavor to deal fairly with the Company's customers, suppliers, competitors, and employees and must not take advantage of them through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any unfair-dealing practice.

Our customers are of the utmost importance, and we must always treat customers and potential customers according to the highest standards of business conduct. At times, the Company may be entrusted with property or valuable information belonging to customers, suppliers, the Company's

employees, or other persons. Without approval, you may not use for personal gain any property or valuable information provided to the Company by customers, suppliers, the Company's employees, or other persons. All employees must use the same care to protect any property or valuable information entrusted to the Company which belongs to customers, suppliers, the Company's employees, or other persons, as must be used to protect the Company's assets.

Our clients and the patients they serve are the reason we are here, and we treat them with respect, honesty, and fairness. We protect our reputation by marketing our services with integrity and in compliance with applicable laws and regulations. We make accurate claims about our products, services, and capabilities, so clinicians can make informed decisions. We build trust with our customers by marketing and selling with integrity. We want our clients to choose Fulgent for the right reasons – because we deliver value, not due to improper influences or practices.

We do:

- Give accurate, truthful, and complete information about our offerings.
- Understand there are stringent regulations around financial arrangements in the healthcare industry.
- Follow applicable laws for advertising and promotion.

We don't:

- Make misleading or false representations about our services.

2. Exclusion Checks

We do not employ or contract with entities that are excluded, suspended, or ineligible to participate in government healthcare programs. To that end, our clients are regularly screened against federal and state exclusion lists for Medicare and Medicaid.

Find out more: *Oversight and Monitoring of OIG and Other Exclusion Lists Policy.*

3. Anti-Corruption and Anti-Bribery

Fulgent is committed to the highest business conduct standards wherever it operates. Fulgent observes these standards worldwide, even at the risk of losing business. While no one can anticipate all the situations that may present challenges to Fulgent employees doing business in the worldwide marketplace, the following guidelines always apply:

- All employees, officers, and directors of the Company must comply with all provisions of the Company's Anti-Corruption Compliance Policy. Paying bribes to government officials is absolutely prohibited, even if those bribes are common practice in a certain geographic area.

- You may not give, promise, or authorize the giving to a foreign official, candidate, or a political party any money, gift, or anything of value in order to influence any act or decision, to induce them to do or not do any act, or to encourage them to use their status to affect or influence any act or decision of a foreign government or agency.
- You must observe applicable laws and regulations, both U.S. and non-U.S., that apply to business abroad.
- You may not enter into an agreement with any third party that relates to Fulgent’s business outside the United States unless it has been approved by the Company.

The laws governing Fulgent’s business in foreign countries are extensive and complex and may be different from those in the United States. Covered Persons have a responsibility with complying with applicable laws and are encouraged to talk to the Compliance Officer if they do not understand the above guidelines. No Fulgent services or products should be offered in any new country without prior approval, and only in accordance with the applicable local country’s regulations and requirements.

We do not permit any form of bribery, corruption, or improper inducements in our business practices. We do not offer, accept, or promise anything of value (or create the appearance of) to a client, patient, another healthcare provider, government official, or business partner that may improperly assist us in any type of unfair business advantage or unduly influence their judgment. We follow applicable anti-corruption laws and regulations federally and in the countries in which we operate (e.g., U.S. Foreign Corrupt Practices Act, UK Bribery Act 2010).

Bribes can range from an offer or promise of money or other items of value to kickbacks for preferential treatment. They can also be something of non-monetary value. We must never offer anything that can be construed to influence the decision of a business partner or healthcare professional. By the same token, we must never accept a bribe to influence our business decisions.

We should always:

- Refuse to give or receive a bribe.
- Inform our manager and the Compliance Officer if a bribe is demanded from us.
- Only provide a benefit if it is:
 - Permitted by local and federal laws and regulations.
 - Transparent and accurately recorded.
 - Not a bribe and cannot be perceived as one.

We should never:

- Directly or indirectly offer, make or promise money or anything of value to influence anyone’s judgment or gain an advantage.
- Accept a bribe to influence our business decisions.
- Attempt to bribe to obtain confidential information or influence a government official.

4. Political Contributions and Lobbying Activities

While we value a system where each of us is free to express our political voice with respect, as individuals, we separate our personal political activities from our work at Fulgent. International, federal, state, and local laws exist to prevent the improper influencing of public officials and to restrict how a company and its employees participate. We do not speak on behalf of Fulgent in a political setting or make political contributions using Fulgent's funds or assets to any political party, campaign, candidate, or public official in the United States or any foreign country.

A "contribution" is any direct or indirect payment, distribution, loan, advance, deposit, or gift of money, services, or anything of value in connection with an election or to an organization or group formed to support or defend a referendum or ballot issue. No political contributions of any type are to be made using Fulgent funds or assets, or with the appearance that they are being made on Fulgent's behalf, unless such contributions are lawful and expressly authorized by the Compliance Officer in writing.

* * *

Question: I have a good friend who is running for political office and has asked if I would endorse him at a rally outside work hours. Can I do that?

Answer: Yes. Just be sure that you clarify your endorsement is your own personal action and not affiliated with the Company and do not use Fulgent's name in connection with your endorsement or donations.

Find out more: *Anti-Corruption Compliance Policy*.

5. Antitrust and Fair Competition

We are committed to fair and open competition with our competitors. We comply with applicable federal and state antitrust laws, and we value an equitable and just marketplace where we compete to sell superior services on our own merit. We follow fair competition and antitrust laws, which help promote healthy competition and protect consumers. Winning business with integrity is at the core of what we do.

Fair competition laws, including the U.S. antitrust rules, limit what Fulgent can do with another company and what Fulgent can do on its own. Generally, the laws are designed to prohibit agreements or actions that reduce competition and harm consumers. U.S. and foreign antitrust laws also apply to imports and exports. You may not enter into agreements or discussions with competitors that have the effect of fixing or controlling prices, dividing and allocating markets or territories, or boycotting suppliers or customers.

We do:

- Avoid interactions with our competitors that could be perceived as misconduct under the terms of our antitrust policies.
- Follow applicable confidentiality and non-disclosure guidelines.
- Respect our competitors' rights with regard to their proprietary information.
- Disclose immediately if we become improperly aware of non-public competitor information.

We don't:

- Discuss pricing, discounts, contracts, or sales and marketing strategies with competitors.
- Agree with any competitor on price fixing, market sharing, hiring policies, etc.
- Limit distributions illegally or boycott a customer or supplier.
- Attempt to acquire or act on trade secrets obtained improperly.
- Obtain confidential information from former employees of competitors.

6. Money Laundering and Terrorist Financing

Our business is conducted legitimately and with funds derived from legitimate sources. We abide by anti-money laundering and terrorist financing laws and regulations, which aim to prevent criminals and terrorists from financing their operations through illegal transactions.

What is money laundering and terrorist financing?

- **Money laundering** is an activity to hide the proceeds of a crime or create a false appearance of legitimate funds.
- **Terrorist financing** means funding or supporting terrorists.

Both are serious crimes under federal law and could result in imprisonment and penalties.

Find out more: *Anti-Corruption Compliance Policy*.

VIII. Our Vendors and Suppliers

1. Our Supplier Relationships

Fulgent's suppliers — companies and individuals that sell products and services to Fulgent — are important to our business. Fulgent employees should always treat suppliers and potential suppliers in accordance with the highest standards of business conduct. Suppliers must be selected on the basis of objective criteria, such as value (quality for price), price, technical excellence, service reputation and production/service capacity. Employees working with current suppliers must never intentionally interfere with a supplier's contracts or business relations with a competitor of Fulgent. Individuals with procurement responsibility should review the sections of this Code concerning fair competition and should be familiar with applicable laws and Company policies.

In compliance with Dodd Frank Section 1502 (which requires that public companies report annually on whether any of the minerals they utilize originated in the Democratic Republic of Congo or an adjoining country), Fulgent has reviewed its products and supply chain and has concluded that conflict minerals are not necessary to the functionality or production of any product offered or sold by the Company. The Company will continue to monitor its products and supply chain to ensure that it continues to comply with the reporting requirements of Dodd Frank Section 1502.

The previously mentioned sections regarding Anti-Corruption/Anti-Bribery, Antitrust and Fair Competition, money laundering, and terrorist financing also apply to our relationships with our vendors and suppliers. Our Supplier and Vendor Code of Conduct and Ethics is an extension of our policies regarding Human Rights, Business Ethics, Health and Safety, and Data Privacy to our vendors. It is intended to ensure our vendor and supplier relationships, which are essential to our success and sustainable growth, and which align with our commitment to reinforce our mission and vision of positively impacting patients' lives and the world around us. This Supplier and Vendor Code of Conduct and Ethics applies to our Suppliers worldwide, and Suppliers are expected to review it prior to pursuing a business relationship with Fulgent, as well as to periodically re-review it, to ensure proper compliance.

2. Contracts and Commitments

You may not enter into any agreement binding Fulgent without authorization. If there are any questions about which employees have signature authority for a given contract, contact the Compliance Officer or such officer's designee. Employees involved in proposals, bid preparations, or contract negotiations should strive to ensure that all statements, communications, and representations to prospective customers are truthful and accurate.

Find out more: *Supplier and Vendor Code of Conduct and Ethics; Anti-Corruption Compliance Policy.*

3. Global Trade Laws

Fulgent is committed to the highest business conduct standards wherever it operates, and that is why we observe all laws and regulations, both U.S. and non-U.S., that apply to our doing business abroad. Following these laws aids our reputation for operating with integrity, honesty, and fairness, as well as protecting our supply chain and services. In addition, to avoid losing trade privileges and to avoid civil and/or criminal penalties, we only work with business partners that abide by these laws as well.

Examples of international trade laws include customs laws, export control laws, and sanction laws

such as embargoes or boycotts. We must follow these laws to do business across borders and be aware of their impact if we:

- Source products outside of the U.S.
- Engage in electronic transfers of information across borders.
- Ship or sell products or provide services across borders.
- Sell services across borders.
- Repackage products imported from another country.

We do:

- Follow our business policies relating to imports and exports.
- Follow all screening and onboarding procedures for suppliers and vendors.
- Report truthful, complete, and timely information on all import declarations.
- Provide accurate product descriptions.
- Confirm that necessary licenses and authorizations are obtained before any transaction.
- Know what we are exporting, the destination, the receiver, and intended use.

We don't:

- Allow shipments to go to a different destination than the one planned.
- Do business with sanctioned countries or regions without the Compliance Officer's approval.
- Do business with entities or individuals on restricted lists without the Compliance Officer's approval.

Find out more: *Supplier and Vendor Code of Conduct and Ethics; Anti-Corruption Compliance Policy.*

IX. Our Shareholders

1. Our Responsibilities to Shareholders

When we effectively manage our Company assets, accurate records, financial reports, and confidential business information; and when we communicate responsibly, we are protecting the Company's reputation and our shareholders' interests and investments. Our shareholders trust us

to always act with integrity and honesty and to foster a positive and respectful workplace where employees are encouraged to report potential misconduct freely, without fear of retaliation.

2. Insider Trading Laws

Insider trading happens when someone illegally uses non-public, material information when trading stocks or other securities. Examples include potential sales, contracts, litigation, joint ventures, financial results, or planned mergers and acquisitions. As an employee, you have an ethical and legal obligation to maintain the confidentiality of company information and to not engage in transactions in company securities (common stock, options to purchase stock, etc.) with knowledge of material non-public information.

Employees, officers, and directors who have access to the Company's confidential information are not permitted to share or to use for their personal benefit or for the benefit of others any confidential information for stock trading purposes or for any other purpose, except when the use is primarily for the purpose of benefiting the Company in the conduct of its business. All employees, officers, and directors of the Company are bound by and must comply with all provisions of the Company's Insider Trading Policy.

Fulgent communicates with the press and with the financial community through official channels only. The Company provides accurate information about its business to investors, the media, and the public. All inquiries received from financial analysts or the media and all legal inquiries concerning Fulgent should be directed to the Compliance Officer. All inquiries regarding current or former employees of Fulgent should be referred to the Human Resources Department.

The purchase or sale of securities, while being aware of material non-public information, or the disclosure of such information to others who then trade in company securities, is a violation of federal and state laws and of our policies. Insider trading violations are vigorously pursued by the Securities and Exchange Commission, U.S. Attorney's Office, state enforcement authorities, and foreign jurisdictions. These violations could result in significant fines and imprisonment, and employees who fail to comply with Company's insider trading policy can face termination and other repercussions.

Remember:

- Never tip friends and family with material, non-public information.
- Trade legally and ethically using only public information.
- Understand quarterly trading blackout periods for applicable team members.

* * *

Question: I saw a "confidential" folder on my manager's desk at the end of the quarter. I wanted to know if we met our goals, so I opened the folder, and it was a memo about an upcoming merger that would not be made public for a week. My father loves to trade in the stock market, so I suggested to him to buy stock in our new company before everyone else hears about the merger. Is this OK?

Answer: No, this is considered insider trading. You have put yourself, your manager, your father, and your company at risk. There are significant civil and criminal fines for insider trading and, potentially, imprisonment. You should not have opened the folder and should not have shared the confidential information with your father. You must promptly report this conduct to the Legal department.

Find out more: *Insider Trading Policy*.

X. Our Communities and the Environment

We comply with applicable state and federal laws relating to the protection of the environment in the conduct of its business. Employees must use, store, and dispose all hazardous materials properly and in accordance with applicable regulations. Employees must report, in accordance with Company policies, all potential legal violations and all circumstances under which hazardous materials or wastes come in contact with the environment or are improperly handled or disposed of. In addition, Fulgent is committed to the conservation of resources and the minimization of any negative impact its operations and facilities may have on the environment.

Fulgent takes environmental impact into consideration when making decisions about the materials and services it purchases. We are committed to environmental responsibility and to complying with applicable environmental and health and safety laws and regulations. We promote the conservation of resources and try to minimize any negative impact our operations and facilities may have on the environment. It is our mission to be good stewards of our resources and to use them wisely and responsibly.

While we strive to have a safe and healthy work environment, employees also have a responsibility to:

- Follow all environmental health and safety rules and practices and policies.
- Report accidents, injuries, and unsafe equipment, practices, or conditions.
- Take precautions when handling hazardous materials and follow proper procedures.

Find out more: *Injury and Illness Prevention Program*.

XI. Human Rights

We align our operations with applicable laws prohibiting forced labor, child labor, and human trafficking by upholding all human rights in our business and our supply chain. We invoke the principles of the United Nations Guiding Principles on Business and Human Rights and seek relationships with business partners that share our commitment to these principles. We are also committed to providing fair and equitable wages, benefits, and other conditions of employment in accordance with local laws.

We do:

- Look for and report signs of potential human rights violations.
- Follow company policies for supplier/vendor onboarding and due diligence.

We don't:

- Engage in or tolerate the trafficking of persons, forced, or child labor.
- Contract with suppliers without onboarding procedures and due diligence.

Find out more: *Modern Slavery Statement*.

XII. Conclusion

So where do you fit in? Everywhere! The foundation and reputation of our Company is directly linked to the communications, actions, and behaviors of our employees. Acting ethically and with integrity in all you do and making the right decisions that reflect our mission and values help us better serve our clients, customers, business partners, and patients they serve. Striving for excellence every day and having the courage to speak up when we see something that concerns us is who we are as a team; and it allows us to be our best, together. Seeking advice when you are not sure is the best course of action in uncertain scenarios; and it is our commitment to you to provide leadership and resources to help you navigate uncertain situations.

To summarize, this Code sets forth the following expectations:

- To live out our mission of providing the highest quality patient care, while abiding by applicable rules and regulations.
- To understand the Company values and expectations and disciplinary actions if the Code is violated.
- To utilize our standards and policies to guide your everyday actions and decision making.
- To speak up if you see or suspect misconduct or unethical behavior, without fear of retaliation.

Those who violate this Code will be subject to enforcement and disciplinary actions, up to and including termination and potential civil and criminal prosecution. **If you are aware of an actual or potential Code violation or believe you may have violated the Code, you must promptly follow reporting procedures outlined in this Code.**

Examples of conduct that could result in disciplinary action include, without limitation:

- Violations of the Code, laws or regulations, or a Company policy.
- Encouraging others to engage in violations.
- Retaliation against another employee for raising a concern.
- Failing to report a concern when there is an obligation to do so under the Code.
- Failing to cooperate fully and honestly in investigations.
- Failing as a leader to take prompt action to escalate a reported concern.

XIII. Channels for Reporting Concerns

We strongly encourage reporting and provide multiple ways in which individuals can report issues and concerns.

Accounting, Auditing, or Internal Accounting Controls (includes anonymous reporting)

1-844-787-9172
<https://app.mycompliancereport.com/report?cid=INFO>

Compliance Hotline , including any potential whistleblower and other concerns (includes anonymous reporting)

1-844-787-9172
<https://app.mycompliancereport.com/report?cid=INFO>

Human Resources

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Privacy

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Safety

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Security

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