



Code of Business Conduct and Ethics

Invitae's principles and standards for
serving patients and the healthcare
community ethically



INVITAE

Message from our President and CEO

To our employees:

As a company, we are committed to conducting business with integrity, transparency and accountability. This allows us to be unwavering in our goal to meet the needs of our customers—our patients and our clinicians—and our sense of urgency grows stronger with each passing year.

The Invitae Code of Business Conduct and Ethics (or our “Code”) captures who we are as a company and the high standards we follow to fulfill our commitments. In this resource, you will find information on our principles and standards for serving patients and the healthcare community ethically.

I encourage you to use these guidelines to navigate some of the complex ethical issues you may face on a daily basis. We all have a personal responsibility to exercise good judgment by following the spirit of our Code and striving to do the right thing even when the law is not specific.

Because of the importance of these principles and standards, you will be required to review our Code and certify your commitment to maintaining compliance annually.

I am proud of our world class team and unique culture that enables us to make tangible progress on our goals. But how we achieve our goals is just as important as the outcome. You are empowered to speak up, take action, or ask for guidance if you feel our Code isn’t being followed.

As you read through the pages that follow, we want you to share in the energy and passion we feel as we ethically execute on our mission to bring genetics into mainstream medicine to improve healthcare for billions—one which is never more important than now, as humanity’s health depends on it.



In good health,

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

Ken Knight
President and CEO

Introduction

It is the general policy of Invitae Corporation (or the “**Company**”) to conduct its business activities and transactions with the highest level of integrity and ethical standards and in accordance with all applicable laws. In carrying out this policy, the Company has adopted the following Code of Business Conduct and Ethics. In addition to being bound by any other codes, policies, and procedures of the Company, all Invitae employees are subject to the additional specific policies contained in this Code.

This Code covers a wide range of business practices and procedures. It does not cover every issue that may arise, but it sets out basic principles to guide all employees, officers, and directors of the Company and its subsidiaries.

Those persons designated as the Company’s senior financial officers in the Code of Ethics for Senior Financial Officers shall also be required to comply with the provisions of that document. All such persons must conduct themselves accordingly and seek to avoid even the appearance of improper behavior.

Invitae will require annual training and certification of this Code for all employees. It is their responsibility to complete the required training of this and other corporate training as assigned.

Those who violate the standards in this Code or who fail to cooperate with management directions given to effect compliance with this Code may be subject to disciplinary action, possibly including termination of employment.

Compliance with Applicable Laws, Rules, and Regulations

We are committed to comply with federal and state laws, ethical behavior, and compliance program operations. Although not all employees are expected to know the details of these laws, it is important to know enough to determine when to seek advice from your Lead or other appropriate contacts.

Questions

If you have any questions regarding this Code, you should address these questions to your Lead or to the Chief Compliance Officer of the Company.

Waiver

Any waiver of this Code for executive officers or directors or any waiver of the Code of Ethics for Senior Financial Officers may be made only by the Board of Directors, or a Board of Directors committee responsible for corporate governance and will be promptly disclosed as required by law.



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Responsibility to the Patient & Healthcare Community

We will fulfill our mission to improve healthcare for patients ethically and in adherence with laws and regulations aimed at protecting the healthcare community.



Compliance with Healthcare Laws

As participants in the heavily regulated healthcare industry, adherence to regulatory compliance principles and procedures is among our highest priorities as these laws often aim to protect the patient and healthcare community. This includes compliance with laws that pertain to clinical laboratories that seek reimbursement from Medicare, Medicaid, and other payers and laws that pertain to relationships between our Company and referral sources such as physicians and hospitals.

Various laws that apply to Invitae's business include:

- The Anti-Kickback Statute
- The Stark Law (or Physician Self-Referral Law)
- The False Claims Act
- Clinical Laboratory Improvement Amendments (CLIA)
- HIPAA Privacy and Security Regulations
- Eliminating Kickbacks in Recovery Act (EKRA)
- Civil Monetary Penalties Law (CMP)

We have a goal of developing products of the highest quality possible. We also are sensitive to the special considerations involved in conducting scientific and clinical research. Therefore, we have developed policies and procedures to ensure that this research is conducted effectively and legally. This means that our research procedures must abide by applicable regulatory requirements and be conducted with respect for the research participants involved.

Finally, we are committed to sharing helpful and accurate information on our products. Our advertising and promotional efforts in conjunction with our business partners must conform to applicable regulations.



Responsibility to the Patient & Healthcare Community



Interacting with Healthcare Professionals

While relevant laws and regulations that govern interactions with healthcare professionals vary by country, we must ensure that any interaction we have with a healthcare professional:

- Serves an appropriate and ethical business purpose,
- Does not interfere with the healthcare professional's independent medical judgment, and
- Does not violate local law, regulation or company policy or procedure.

Q:

Healthcare professionals (or “HCPs”) are often subject matter experts that can provide valuable insights for our company. Are we ever allowed to engage healthcare professionals, such as physicians, to be consultants?

A:

Yes, if there is a legitimate business need for the HCP's expertise, compensation is provided at a fair market value rate, and the engagement follows other important requirements outlined in the **Interactions with Healthcare Professionals Policy**.



Commitment to Quality of Products & Services

Our mission is to bring comprehensive genetics into mainstream medicine to improve healthcare for billions of people.

We are committed to providing high-quality products and services to our customers through all levels of the organization. This focus on our customers, patients, and dedication to delivering the right result in a timely manner, drives our commitment to monitoring performance and continuous improvement.

Our Corporate Quality Manual provides a framework which supports corporate policies, procedures, processes, and guidance to ensure we meet our customers' expectations and helps us to meet regulatory and applicable standards requirements through all levels of the organization.



Invitae offers the right test, for the right patient, with the right result, at the right time.

Responsibility to the Patient & Healthcare Community



Privacy & Data Security

The way we manage records could affect our business, our patients and customers, and our reputation. That means we should safeguard personal information, keep records up to date, and gather market and competitor information in the right way.

Invitae has a comprehensive privacy and data security program. Our Chief Privacy Officer (CPO) leads our privacy program, and our Chief Information Security Officer (CISO) leads our security program. Ensuring that people own and control their genetic data has been one of our core principles from inception.

We are committed to the privacy and security of all protected health information (PHI) we create, receive, use, disclose, and transmit. Our privacy practices are explained within our HIPAA Notice of Privacy Practices and Privacy Policy on our website.



Handling Personal Information with Care

We're all responsible for handling personal information (PI) with special care. We must only collect the minimum information necessary for our business goals. We tell the person exactly what we are doing with their information, how long we will keep it, and why we are collecting it. We destroy PI when we no longer need it for our business goals.

We also have a duty to protect the personal information we collect and

retain about people to ensure it is not misused—from patient data used in research to employee payroll information. If you see or suspect unauthorized disclosure or misuse of PI, accidental or intentional, you should file a privacy incident ticket.

All employees and third-party suppliers who work with PI must complete relevant training.

Responsibility for Fair & Sustainable Business Practices

We are committed to promoting fair competition, operating our business in a responsible and sustainable way, and achieving business success through legal and ethical business practices.

We recognize that we are part of the communities in which we operate, and, as part of our mission, we believe respect for human rights is integral to our business. Our [Human Rights Policy](#) outlines the fundamental rights, freedoms, and standards of treatment to which we believe all people are entitled. These rights include respect for labor rights, treating all people with dignity and respect, enabling a healthy and safe work environment,

promoting ethical behavior, and respecting privacy. This Human Rights Policy also has information on our expectations for suppliers.

Invitae has also adopted a [Supplier Code of Conduct](#) which further outlines our expectations for our suppliers and their subcontractors to comply with applicable laws and to operate their businesses in an ethical and sustainable manner.



Prohibiting Bribery & Corrupt Payments

We prohibit any and all forms of bribery or corrupt payments, regardless of whether they involve government officials or those in the private sector. Bribery, which is defined as the offering of anything of value to an individual for purposes of inappropriately influencing a business decision or gaining an unfair business advantage, is banned by laws around the world. These laws, referred to as anti-bribery and anti-corruption laws, are stringent and far-reaching.

They prohibit companies from offering or giving anything of value, directly or indirectly, to a government official, political party member, or business representative for purposes of securing an improper advantage or obtaining or retaining business.

Anti-bribery and anti-corruption laws also require that companies maintain

proper financial records and internal accounting controls to ensure that improper payments are not concealed with falsified records.

Employees who work with non-U.S. partners must understand the bribery risk profile for every country in which they have responsibilities to ensure that appropriate attention to compliance is given, particularly in high-risk jurisdictions. Around the world, healthcare professionals work in government-operated medical settings and serve as researchers or teachers in government funded educational institutes. As such, these healthcare professionals are considered government officials under anti-bribery and anti-corruption laws.

For additional guidance, please reference the [Invitae Anti-Bribery Anti-Corruption Policy](#).

Responsibility for Fair & Sustainable Business Practices

Did you know?

- Bribery is not limited to cash or cash equivalents – anything of value can be a bribe.
- Just offering or promising to make a corrupt payment can violate the law.
- There is no minimum value rule as to what constitutes a bribe.
- Healthcare professionals working for state owned enterprises and government bodies, like public hospitals or universities, are considered government officials.
- Invitae can be held accountable for the corrupt actions of third parties acting on our behalf.



Please review the **Invitae Corporation Anti-Bribery Policy** for more information on complying with relevant anti-bribery requirements.



Transfers of Value

Under no circumstances may employees, officers, directors, agents, or contractors offer or accept any money, gifts, or anything of value that is perceived as intended, directly or indirectly, to influence any business decision.

In certain circumstances, inexpensive gifts, infrequent business meals, celebratory events, and entertainment – provided they are not excessive and do not create an appearance of impropriety – do not violate this Code. Questions regarding whether a particular payment or gift violates the Code are to be directed to the Chief Compliance Officer.

Gifts to HCPs and government officials are prohibited and may not be provided under any circumstances.



The nature and cost of any applicable transfer of value must be accurately recorded in Invitae's books and records.

Also note that any gifts, including gift cards, for colleagues, even those for sympathy or congratulations, are considered personal and should be paid out of pocket. For guidelines on whether or not an expense is reimbursable, please refer to Invitae's Travel & Expense guidance.

Responsibility for Fair & Sustainable Business Practices



Q:

It would be considered an insult in certain countries to refuse a gift from a customer. What should I do in this situation?

A:

Invitae respects the customs of individual cultures and countries where we do business. If you feel it would be considered disrespectful, contact your lead or the Legal team to determine how to proceed. You should remember that lavish gifts or gifts that appear to be intended to influence are never appropriate regardless of cultural expectations.



Fair Dealing

Although the prosperity of Invitae depends on our ability to outperform our competitors, Invitae is committed to achieving success by fair and ethical means. We seek to maintain a reputation for honesty and fair dealing among our competitors and the public alike. In light of this aim, dishonest, unethical, or illegal business practices are prohibited. We should never take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any other unfair business practice.

Invitae complies with all antitrust and fair competition laws. These laws generally prohibit agreements between competitors that seek to

allocate market share or fix prices. Rather than providing an exhaustive list of anti-competitive practices, we rely on the judgment of each individual to avoid discussing pricing or allocating territories with competitors or suppliers, and to reach out to your Lead and/or the Legal team with questions you may have on a particular activity.



Responsibility for Fair & Sustainable Business Practices



Environmental Stewardship

We take our responsibility for environmental stewardship seriously and believe that we must do our part to protect the environment. We are committed to meeting or exceeding applicable environmental laws and regulations, and to continuously improving our environmental performance.

We aim to integrate sustainable business practices, energy-efficient technologies, and eco-friendly products that advance our progress

in reducing our carbon footprint, water consumption, and waste.

We consider sustainability during development and design of new products, processes, and facilities.

See the [most recent Invitae ESG Report](#) for more information on Invitae's commitment to our environmental, social, and governance practices.

We consider the following **corporate tenets** in our decision making at all levels of the organization to ensure that as we conduct our business, we are doing so in a transparent, ethical, environmentally conscious way. We strive to be a good corporate citizen in the communities we serve.

- ◆ **Healthcare for humanity:** Continue to support patients through all stages of life with an affordable, integrated solution of health information, digital solutions and data services that will shape the genomic medicine era.
- ◆ **Environment:** Make environmental issues such as reducing, reusing, and recycling a priority. Work to reduce the emissions footprint of the company with the eventual goal of achieving carbon neutrality.
- ◆ **Social:** Build a diverse workforce, cultivate a workplace where everyone can be engaged, and advance inclusive research and health equity. Ensure we are doing our part as good corporate citizens up and down our value chain, including executing on our [Human Rights Policy](#) and our [Supplier Code of Conduct](#).
- ◆ **Governance:** Continue to prioritize transparency, trust, and corporate governance to hold Invitae accountable, measure success scientifically, and ensure our long-term commitments to our patients are met.

Responsibility to Our Colleagues

Invitae is committed to providing a safe and respectful environment for our employees to thrive.



Safe & Healthy Workplace

Invitae strives to provide a safe and healthy workplace and is committed to protecting the environment, health, and safety (EHS) of our employees, customers, and the public. We maintain management systems designed to ensure compliance with applicable regulatory agencies and Invitae's requirements, which support the integration of EHS into our business practices.

Invitae will not tolerate any level of violence in the workplace or in any work-related setting. You may not be in possession of firearms or other weapons while on Company premises or otherwise engaged in Company business.

Management at all levels will take actions to ensure that all employees understand the meaning and importance of our Health

and Safety Policies. All employees are responsible for maintaining a safe and healthy workplace by following these policies, which include reporting all incidents, injuries, and unsafe conditions. Invitae will take all necessary corrective actions to ensure reported issues are addressed appropriately to prevent reoccurrence.



Open & Respectful Workplace

At Invitae, we value a diverse and inclusive workplace, and our employees are treated with fairness and respect. The Company prohibits any form of employee harassment or discrimination based on factors such as race, gender, color, national origin, religion, age, sexual orientation, disability, gender identity, familial status, military or veteran status, genetic information, citizenship status, or any other characteristics protected by laws of the relevant country.

Employees receive and must complete mandatory anti-harassment training to help ensure our employees can work in an environment free from unlawful harassment. We also encourage you to report any potential violation of our principles to your Lead, People & Culture team, or through one of our anonymous reporting channels, as outlined in Section 5 of this Code.

Responsibility to Our Colleagues



Policy Against Retaliation

Invitae will not allow retaliation against an employee for reporting a possible violation of this Code unless it can be shown that the report was knowingly false.

Retaliation for reporting a federal offense is illegal under federal law and prohibited under this Code. Such retaliation will result in discipline up to and including termination of employment and may also result in criminal prosecution. The employee is protected from retaliation even if the investigator does not agree that there has been a violation.

However, if the employee making the report was involved in improper activity, the fact that they reported it will not necessarily prevent them from being

disciplined for their participation in the violation. In these circumstances, the Company may consider the employee's conduct in promptly reporting the information as a mitigating factor in any disciplinary decision.

You can report violations in confidence without fear of retaliation.



Q:

What if I report an issue about my Lead? They will know it's me who reported it because I am the only one who knows about the issue.

A:

Invitae will not tolerate retaliation against any employee for making a good-faith report of a potential issue, even if a subsequent investigation proves the reported incident to be unfounded.

Responsibility to Our Company

We protect our company assets, information and documents, and we ensure correct record keeping.



Confidentiality

If you come into possession of non-public information regarding Invitae (or any other companies from which the employee receives information) not available to investors or others outside Invitae, you generally must safeguard such information from public disclosure.

You must not intentionally or inadvertently communicate confidential information to anyone (including colleagues, family members, and friends) unless the person has a need to know the information for legitimate, Invitae-related reasons. Specifically, employees are only

permitted to use such information in the performance of their job duties on behalf of Invitae. This duty of confidentiality is important both for Invitae's competitive position and with respect to the securities laws applicable to Invitae as a public company.

Documents or electronic files containing confidential information should be labeled as "Confidential," where practicable. Employees are not permitted to remove physical or electronic copies of confidential information from Invitae property unless required by their job duties.

Confidential information can include a variety of materials and information regarding our ongoing operations and plans, and also includes information that customers, partners, or suppliers provide us.

- Facility or product development plans
- Intellectual property such as inventions or patents
- Significant new contracts
- Research or clinical data
- Information regarding the financial health and performance of Invitae or other companies
- Customer lists
- Salary and personnel information
- Marketing and sales plans
- Plans for significant acquisitions or divestitures
- Plans to raise additional capital

Responsibility to Our Company



Confidentiality, cont.

Confidential information cannot be disclosed by any employee to any third party unless the third party has signed a nondisclosure agreement approved by Invitae's management and should be divulged only to persons needing to know the information in order to carry out their job responsibilities.

Further, you may not use any confidential information other than for legitimate, Invitae-related reasons. You must also abide by any specific agreements including, but not limited to, your Confidential Information and Invention Assignment Agreement and our policies regarding confidentiality between you and Invitae.



Insider Trading

You are not permitted to use, share, or disseminate confidential information for stock trading purposes or for any other purpose except the conduct of our business. To use confidential information for personal financial benefit or to "tip" others who might make an investment decision on the basis of this information is not only unethical, it is also illegal.

You are expected to comply with Invitae's [Insider Trading and Communications Policy](#).



From time to time, we are also subject to "trading blackouts." Please refer to Invitae's [Insider Trading and Communications Policy](#) for more information.

Q:

I receive an email that looks like an outline of plans for Invitae to purchase another company. I don't know the sender, and it looks like I was cc'd by accident. Am I allowed to trade in securities of Invitae or the company that may be acquired?

A:

No, you are not allowed to do anything with the confidential information, even if the information could be of use to you. You are also not able to provide trading recommendations to non-insiders based on this insider information you have received. For additional actions to take, please contact Invitae's General Counsel or Legal team.

Responsibility to Our Company



Communicating on Behalf of the Company

Invitae recognizes the role social media, personal websites, and other self-publishing platforms play in both professional and personal communication. As an Invitae employee, your commentary is not only a direct reflection of you personally but also our team, our company, and our brand.

We also recognize the role Invitae employees play in helping to bring comprehensive genetic information into mainstream medicine to improve healthcare for billions of

people – not just in the work you do every day but also in your role as brand ambassadors.

When discussing the Company, responding to questions from third parties, or posting on social media sites, you must be mindful to avoid giving the appearance that you are speaking on behalf of the Company. Anything you communicate can be viewed as an official statement from Invitae, and this could undermine the position of the company.



Can I share a LinkedIn post from Invitae with my own LinkedIn network?



Yes, you may “like” or share content that Invitae publishes – this is a great way to increase awareness of our company.



I see an individual post negative and false statements about Invitae products on social media. Can I correct them using my personal account?



No, you may not engage with other social media users regarding Invitae products. Contact the Invitae Corporate Communications team regarding messages like this and do not respond personally.

Responsibility to Our Company



Conflicts of Interest

A “conflict of interest” arises when your loyalties or actions are divided between the interests of Invitae and those of another, such as a competitor, supplier, or customer, or personal business. A conflict of interest can arise when an employee takes actions or has interests that may make it difficult to perform their work for Invitae objectively and effectively. A conflict of interest may also arise when an individual, or a member of their family, receives an improper personal benefit as a result of their position in, or relationship with, Invitae. Breach of confidentiality obligations can also give rise to a conflict of interest. Moreover, the appearance of a conflict of interest alone can adversely affect Invitae and its relations with customers, suppliers, and employees.

You are expected to use good judgment, adhere to high ethical standards, and avoid situations that create an actual or potential conflict of interest. It is almost always a conflict of interest for employees to work simultaneously for a competitor, customer, or supplier.

A conflict of interest can also arise with respect to employment of relatives and persons with close personal relationships. If an employee or someone with whom an employee has a close relationship (e.g., a family member or close companion) has a

financial or employment relationship with an actual or potential competitor, supplier, or customer, the employee must disclose this fact in writing to Invitae’s Chief Compliance Officer. Invitae may take any action that it deems necessary in its sole discretion to avoid or remedy an actual, prospective or perceived conflict of interest, including a reassignment of some or all of the employee’s duties or change of the employee’s position.

A conflict of interest may not always be clear; therefore, you should consult with your Lead if you have any questions. Any employee who becomes aware of a conflict or a potential conflict should bring it to the attention of the Chief Compliance Officer.

If you find yourself in an actual or potential situation where your **personal interest could conflict with the company’s** – for example if a friend or family member is employed by a supplier with which Invitae is in negotiation – be open and transparent about the situation and bring it to the attention of the Chief Compliance Officer.

Responsibility to Our Company



Corporate Opportunities

You must not take for yourself opportunities that are discovered through the use of Company property, confidential information, or your position with the Company without the consent of the Board of Directors or its designees.

No employee may use corporate property, information, or their position for improper personal gain, and no employee may compete with Invitae directly or indirectly while they are employed by the Company. You owe a duty to Invitae to advance its legitimate interests when the opportunity to do so arises.



Protection & Proper Use of Company Assets

No secret or unrecorded fund of Company assets or cash shall be established or maintained for any purpose. Anyone spending or obligating Company funds should be certain that the transaction is properly and appropriately documented and that the Company receives appropriate value in return.

We all have a responsibility to use the Company's assets in an economical and efficient way. Items such as supplies or equipment are provided to help you do your job and, in general, should not be used for personal reasons and may never be used for personal financial gain.

There may be limited circumstances where personal use of Company resources is acceptable. If you have questions about those situations, discuss them with your Lead.

Theft, carelessness and waste have a direct impact on the Company's profitability. Any suspected incident of fraud or theft of company property, including intellectual property assets or information stored on IT systems, should be immediately reported to the Chief Information Security Officer (CISO) and Chief Financial Officer (CFO) of the Company for investigation.

Responsibility to Our Company



Record Keeping

Invitae requires honest and accurate recording and reporting of information in order to make responsible business decisions. If you use a business expense account, expenses to be reimbursed must be documented and recorded accurately. If you are not sure whether an expense is appropriate, ask your Lead.

All of our books, records, accounts, and financial statements must be maintained in reasonable detail, must appropriately reflect the Company's transactions, and must conform both to applicable legal requirements and to the Company's system of internal controls. All of Invitae's business data, records and reports must be prepared truthfully and accurately. Our business records must be maintained for the periods specified in our applicable record retention policies.

Examples of books, records, and accounts that must accurately reflect our business transactions include time sheets, bills, invoices, expense reports, contracts, accounting records, laboratory notebooks, shipping and customs records, and other essential Company data.

Employees who contribute to or prepare Invitae's financial statements, public filings, submissions, or communications should do so in accordance with the following guidelines:

- All accounting records, as well as reports produced from those records, must be prepared in accordance with the laws of each applicable jurisdiction
- All records must fairly and accurately reflect the transactions or occurrences to which they relate
- All records must fairly and accurately reflect, in reasonable detail, Invitae's assets, liabilities, revenues, and expenses
- Invitae's accounting records must not contain any false or intentionally misleading entries
- No transactions should be intentionally misclassified as to accounts, groups, or accounting periods
- All transactions must be supported by accurate documentation in reasonable detail and recorded in the proper account and in the proper accounting period
- No information should be concealed from independent auditors
- Compliance with Invitae's system of internal accounting controls is required

Business records and communications often become public. Employees should avoid exaggeration, derogatory remarks, guesswork or inappropriate characterizations of people and companies that can be misunderstood. This applies equally to email, internal memos, and formal reports.

How to Ask Questions & Report Potential Issues



Reporting Potential Violations

Employees are responsible for being aware of the corporate policies applicable to their activities and to comply with them fully. If you become aware of a violation of this Code or believe that a violation may take place in the future, you must promptly report the matter. Failure to report a known violation allows misconduct to go unremedied and is itself grounds for discipline. Ordinarily, the report may be made to the employee's immediate Lead who, in turn, must report it to the Chief Compliance Officer and the Chief Financial Officer.

If the report pertains to concerns regarding questionable accounting or auditing matters, you should direct the report to the Chair of the Audit Committee of the Board of Directors as described in our policy entitled "**Procedures for Reporting Questionable Accounting and Auditing Matters.**" These reports can be made at any time.

Employees submitting a report on an anonymous basis are strongly encouraged to keep a copy of the report (if made in writing) and a record of the time and date of submission, as well as a description of the matter as reported if the report was not in writing.

Employees are encouraged to provide as much specific information as possible, including names, dates, places, and events that took place, relevant documents, and the employee's perception of why the incident(s) may be considered misconduct.

This report may be made anonymously, at the employee's discretion, through the following methods:

Website: www.lighthouse-services.com/invitae

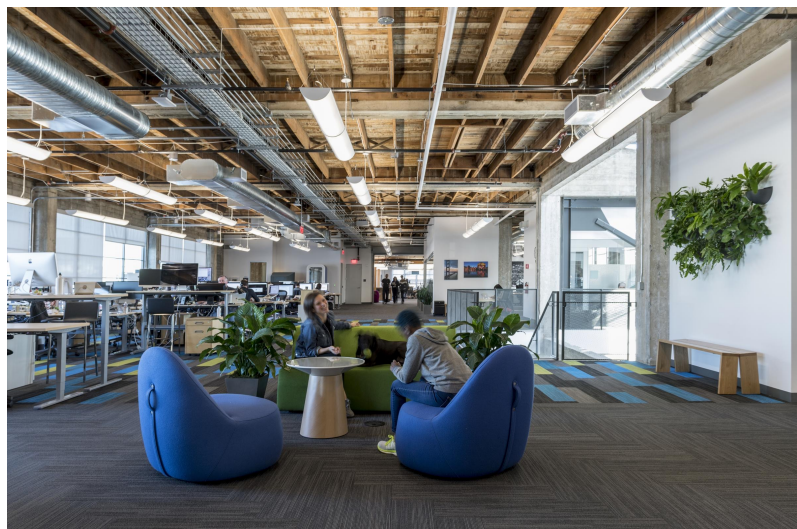
Telephone: 1-833-470-0006

- For additional telephone options in your respective country, visit the Legal, Ethics and Compliance webpage.

E-mail: reports@lighthouse-services.com (must name Invitae in the report)

If possible, the employee should provide a means by which they can be contacted in the event that an investigator needs to follow-up or wants to report back to the employee.

As outlined in Section 3 under our "Policy Against Retaliation," Invitae will not allow retaliation against an employee for reporting a possible violation of this Code.



How to Ask Questions & Report Potential Issues



What to Do if You Have Questions or Are Unsure About a Transaction

We must all work to ensure prompt and consistent action against violations of this Code. However, in some situations, it is difficult to know right from wrong. Since we cannot anticipate every situation that will arise, it is important that we have a way to approach a new question or problem.

- Always ask first, act later. If you are unsure of what to do in any situation, seek guidance from your Lead or the Chief Compliance Officer before you act.
- Make sure you have all the facts. In order to reach the right solutions, you must be as fully informed as possible.
- Ask yourself: What specifically am I being asked to do? Does it seem unethical or improper? This will enable you to focus on the specific question you are faced with and the alternatives you have. Use your judgment and common sense. If something seems unethical or improper, it probably is.
- Discuss the problem with your Lead. This is the basic guidance for all situations. In many cases, your Lead will be more knowledgeable about the question and will appreciate being brought into the decision-making process.
- Seek help from Invitae resources. In the event it is inappropriate to discuss an issue with your Lead, or if you do not feel comfortable approaching your Lead with your question, you may contact the Chief Compliance Officer.
- You may report ethical violations in confidence and without fear of retaliation. If your situation requires that your identity be kept secret, your anonymity will be protected.

Use your judgment and common sense. If something seems unethical or improper, it probably is. If you are unsure of what to do, seek guidance from your Lead or the Chief Compliance Officer before you act!



Appendix

Enterprise Policies

Anti-Bribery Anti-Corruption

Charitable Donations and Educational Grants

Ethics Hotline

Human Rights

Insider Trading & Communications

Interactions with Health Care Providers

Medical Legal Regulatory Review (MLR)

Patient Privacy

Quality Manual

Supplier Code of Conduct