

CODE OF ETHICAL BUSINESS CONDUCT

Prometheus Laboratories

Our commitment to integrity

(as adopted on January 8, 2021)

Prometheus Laboratories Inc.

Message from our President

Prometheus Laboratories Inc., (“Prometheus” or the “Company”) believes in conducting business with the highest of ethical standards. We hold ourselves and others accountable to do the right thing. The Code of Ethical Business Conduct (“the Code”) is our guide to understanding what is expected of us in how we do business.

It is important not only for you to read and understand the Code but to live it day-to-day as you make decisions on behalf of the Company. Ethics is not something that is dictated by a particular department or individual but is owned by each and every one of us here at the Company. Our values- integrity, trust, excellence, accountability, and mutual respect help shape how we work and conduct business. While the Code is a good road map, it is not exhaustive list of every policy or rule you may need to conduct business in your role nor is it intended to address every situation that you may encounter.

We expect you to raise concerns and speak up if you see something that goes against our Code and our ethical culture. We must always act with integrity, take accountability for results, and do the right thing even when doing the right thing is hard. We expect you will do what is right and not what is easy, even when no one is looking.

If you have questions please consult the Code, or reach out to management, Human Resources, Legal or the Privacy and Compliance team.

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Sincerely,

Mike Walther

Mike Walther
President

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I. OUR FUNDAMENTAL COMMITMENTS

Prometheus is a diagnostic company pioneering a precision medicine approach to the discovery, development, and commercialization of diagnostic products for the treatment and diagnosis of inflammatory bowel disease (IBD). Our diagnostic franchise is comprised of laboratory developed tests (LDTs) we commercialize. To better serve our constituents, we adhere to the following commitments:

TO OUR PATIENTS: We are committed to improving the lives of patients by providing physicians with a comprehensive approach to the diagnosis and treatment for acute and chronic diseases. Our commitment to personalized medicine helps physicians to make better decisions for their patients.

TO OUR FELLOW PROMETHEUS EMPLOYEES: We are committed to a culture that treats all employees (as well as contingent staff and consultants) with fairness, dignity, and respect, and affords them an opportunity to grow, develop professionally, and work in a team environment in which all ideas are considered.

TO OUR HEALTHCARE PROFESSIONALS: We are committed to integrity in all our interactions with healthcare professionals, including marketing and sales activities. We provide valuable and accurate information to healthcare professionals and organizations in accordance with all applicable laws, rules and regulations that govern our marketing and sales activities.

TO OUR THIRD-PARTY PAYERS: We are committed to dealing with our third-party payers in a way that demonstrates our commitment to contractual obligations and reflects our shared concern for quality, cost effective health care. We encourage each of our third-party payers to adopt their own set of ethical principles to explicitly recognize their obligations to patients as well as the need for fairness in dealing with providers.

TO OUR REGULATORS: We are committed to an environment in which compliance with laws, regulations, and sound business practices is woven into our corporate culture. We accept the responsibility to aggressively self-govern and monitor compliance with the requirements of local, state and federal laws, industry guidance, and our Code.

II. STATEMENT ON CODE OF ETHICAL BUSINESS CONDUCT

Prometheus expects high ethical standards in the provision of healthcare services and products and in the conduct of its business affairs. Prometheus complies with all federal, state, and local statutes, regulations, and industry standards applicable to its operations and business dealings with the public and at all governmental levels. This Code applies to all employees, officers and directors of, and certain consultants to, Prometheus (the “Prometheus Representatives”) and must be followed.

We take our responsibility to act with honesty, integrity and respect very seriously, and the Code memorializes our business philosophy and our commitment to uphold its principles. Healthcare is a complex, highly regulated, interdisciplinary, service-oriented industry, which continually faces changes in technology, delivery systems, standards of care, treatment protocols, rules and regulations, funding and reimbursement, and service needs of patients and their families. With this complexity in mind, this Code serves an integral component of our overall antifraud and ethics programs. This Code was developed to ensure that everyone understands the ethical standards and legal responsibilities that govern our business decisions and actions.

This framework serves as a guide to our ethical principles and what we consider appropriate conduct by Prometheus Representatives. Prometheus Representatives are expected to comply with the letter and spirit of all laws, regulations, and this Code, as well as the standards of conduct presented in the Company’s policies, procedures and, as applicable, its Employee Handbook. These requirements must be followed even in circumstances where a departure from the rules might appear to benefit Prometheus.

The standards expressed within this Code will be monitored and enforced at all organizational levels. Such standards are fundamental to establishing a culture within Prometheus that promotes prevention, detection, and resolution of instances of conduct that do not conform with federal, state or local laws, Prometheus’ policies and procedures, or ethical business practices. Each person associated with Prometheus has a duty to commit to compliance in the performance of his or her duties. Violations of our Code, or the underlying laws, regulations and policies, may result in corrective action up to and including termination of employment, suspension of privileges, termination of business relationships, civil or criminal liability, and/or financial penalties.

Disciplinary action will depend on the nature of the violation and the circumstances involved. Disciplinary action may be taken for, but not limited to, any of the following circumstances:

- Authorizing or participating in actions that violate the Code or Prometheus' policies;
- Failing to report a violation of the Code and company policies;
- Refusing to cooperate in the investigation of a potential violation;
- Disclosing confidential information about an investigation;
- Retaliating against an individual for reporting a potential violation in good faith;
- Making a false report of misconduct or violation of the Code.

Given the complexity of the regulatory landscape that governs our industry, the Code is a resource and a guide that ensures that we act in accordance with all applicable laws, regulations, and standards that govern the healthcare industry. It is, therefore, our responsibility to ask any questions we may have regarding the Code and to voice any concerns regarding the Code to ensure that we fully understand every aspect of the Code. Prometheus may revise the Code as it deems necessary in the course of its business. Any changes to this Code will be communicated. If you have questions or need assistance in applying this Code, it is your responsibility to contact your supervisor or the General Counsel, Compliance Officer, Human Resources or the Ethics Hotline.

III. ETHICS STANDARDS

We model our core values of integrity, trust, excellence, commitment, accountability, and mutual respect.

- We endeavor to know, abide by, and understand the specific laws, policies, and procedures that apply to our jobs, roles, assignments, and to us as individuals.
- We are empowered and responsible to speak up with concerns about compliance and ethical issues. We recognize that our daily work gives us each the opportunity to see problems in our local areas before they become apparent to others or to management.
- We ask for help when we have questions or concerns about a situation. We may report observed and suspected violations of laws or policies to
 - our supervisor, manager or director,
 - Human Resources,
 - the General Counsel
 - Compliance Officer,
 - the 24-hour confidential hotline Prometheus Ethics HelpLine at 1-888-PRO-RXDX, or
 - the confidential web reporting portal at www.mycompliancereport.com/brand/rxdx.
- We coordinate any investigation of potential violations through appropriate channels.

All reports to the Ethics HelpLine are received by trained personnel at a company contracted with, but independent of Prometheus, who document and forward all issues to the Compliance Officer, or designee for appropriate action. If you choose to identify yourself, your identity will be kept confidential to the extent permitted or required by law. All disclosures, interviews and reports shall also be kept confidential, to the extent permitted or required by law. Reporters will always have the option to remain anonymous.

1. Safeguarding the Company's Interests

a) **We are honest with Prometheus funds and assets.**

We are careful with Prometheus funds to make sure they are used effectively. We must not engage in any activity which degrades the reputation or integrity of Prometheus. We:

- Abide by Company policies and procedures for the secure handling of Prometheus funds.
- Accurately prepare financial records.
- Make sure that any funds we spend or approve reflect the appropriate use of Prometheus resources.
- No funds or assets of Prometheus shall be paid, loaned or otherwise disbursed as bribes, kickbacks or other payments designed to influence or compromise the objective conduct of the recipient.
- We also do not accept any funds or assets, including those provided as preferential treatment for fulfilling our responsibilities, for assisting in obtaining business or for securing special concessions for a company.

b) **We protect Company assets.**

We respect and use the Company's resources for legitimate business reasons and encourage others to do the same. Prometheus' resources include, but are not limited to, property, funds, information, records, intellectual property, clinical and business equipment, computer systems, telephones, and the corporate name. We are expected to protect our Company assets and ensure their efficient use. Theft, carelessness and waste have a direct impact on our profitability. We are expected to use Prometheus property only for legitimate business purposes. We may not use our corporate name, any brand name or trademark owned or associated with Prometheus or any letterhead stationery for any personal purpose.

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

c) **We are responsible with Company time and resources.**

We use our time at Prometheus to further the Company's mission. We accurately report and record our time. Misuse of paid time or Company resources may be considered theft from Prometheus.

d) We review contracts and sign them based on signing authority.

We sign or agree to contracts only if we are authorized by Prometheus policy to do so. Contracts obligating Prometheus are required to receive a legal review, unless specifically exempted. This applies to all legally enforceable agreements that create an obligation for Prometheus whether in written, online, verbal, or in other forms.

e) We disclose possible conflicts of interest.

We avoid situations where our personal interests may conflict with those of the Company. When it comes to work, we have a duty to put the interests of Prometheus before our own personal interests or gain. A conflict of interest arises if we have a personal, financial, or other relationship or interest that could interfere or compete with the interests of Prometheus, or if we are in a situation to use our position with the Company for personal gain. A conflict of interest includes anything that divides our loyalty between the best interests of Prometheus and those of another, such as a supplier, friend, relative, or competitor. All such conflicts, including the appearance of a conflict, should be avoided. We inform our managers when confronted with any circumstance that could be perceived as a conflict of interest, even if we do not think the situation would violate Company guidelines. Conflicts of interest must be reported to Human Resources, General Counsel and/or Compliance Officer.

f) We protect Company intellectual property.

We encourage the creation and development of new inventions, processes, and technologies. To protect the Company's interests, we must not disclose Company proprietary materials or information unless authorized by applicable Company policies, procedures, or guidelines or by the Company. We have developed and own substantial unique technology. We also partner with other companies whose business information is proprietary to them. Much of the information concerning our business and our partners are confidential and should not be disclosed to our employees except as necessary in the performance of their jobs or to anyone outside of the Company, including family and friends. Confidential information is one of our most important assets. We are responsible for guarding against unauthorized disclosure of Company confidential and proprietary information

g) We use appropriate communication channels.

We work together to ensure accuracy as we prepare public presentations or media interviews. We do not act as a spokesperson for Prometheus without approval. Since it is essential that information disclosed about the Company be consistent, non-public information about Prometheus, including financial information, may not be revealed to outsiders without the express authorization of the President or the Chief Financial Officer. We forward all media, financial, and business press, etc. requests to the President or Chief Financial Officer or his/her designee. Only these individuals are authorized to respond to these inquiries

2. Ensuring Fair and Ethical Business Practices

a) **We follow all laws and regulations.**

We are committed to knowing, understanding, and abiding by all laws, regulations, and Prometheus policies and procedures that apply to our jobs or assignments. We refrain from conduct that may violate any laws pertaining to fraud, waste, and abuse of government funds. Business should be conducted in such a manner that Prometheus' reputation would not be damaged if the details of the dealings should become a matter of public discussion

We will report all suspected violations through the proper internal channels for investigation. Upon consultation with legal counsel and in accordance with applicable law, Prometheus management will report violations to the appropriate authorities.

b) **We ensure accuracy of records and reporting.**

We ensure that our records are accurate and not misleading. The Company's credibility is judged in many ways—including the accuracy and completeness of our records. These include business records such as financial transactions and financial reports, personnel, insurance, and medical records. We depend on accurate and reliable information to make responsible business decisions.

We comply with local, state, and federal laws relating to the accuracy and completeness of all records. We retain our records according to legal requirements and internal record retention schedules. We are honest, objective, and accurate in our recordkeeping. If we make mistakes, we will follow standard protocol to correct them and will not hide them. Altering documentation of any type to hide or mislead the users of the information is unacceptable.

Coding and billing records must be created based on accurate documentation that supports each claim. Medical records are the only source of information for the proper billing of the services provided as ordered by the patient's physician. Diagnostic or procedural codes and other pertinent medical information included in the chart must adequately support the "medical necessity" for the service being billed, regardless of whether billed to Medicare, Medicaid, or other third-party payors. We create, approve, and archive records to document our work, including the services rendered to patients, members, and others; work performed by employees, contractors, and others; and purchases made from suppliers. The accuracy of records involves both factual documentation and ethical evaluation or appraisal.

c) **We maintain our community's confidence by competing fairly in the market.**

We comply with antitrust laws. These laws are designed to create a level playing field in the marketplace and to promote fair competition with other health systems and facilities in markets where we operate. We risk violating these laws by discussing with a competitor certain aspects of the Company's business such as how we establish our prices, the terms of supplier relationships, or agreeing with a competitor to refuse to do business with a supplier. We seek the advice of legal representatives prior to discussing potentially sensitive topics with competitors or suppliers.

d) We support internal and external audits

Audits are performed to assess areas for compliance. These audits may be performed by internal and/or external auditors with experience in the area under review. If corrective action is needed, a written plan is developed and implemented to ensure compliance.

e) We interact with suppliers honestly.

We value our suppliers, as they play a role in the success of Prometheus. Suppliers include anyone providing products or services to Prometheus. Our selection of suppliers will be made on their ability to meet our business needs, rather than on personal relationships and friendships, or on any inducements or personal offers.

We interact with our suppliers with honesty and integrity, which means we do not take kickbacks or bribes from them, nor do we offer such inducements to them. When working with suppliers, we do so free from conflicts of interest and are compliant with applicable laws and fair business practices. Gifts of any kind from suppliers are discouraged and not solicited. If a gift is offered, the value of the gift should only be of nominal value.

f) We interact with customers and patients with sensitivity and honesty.

Working through patients' treating physicians, we help patients understand and exercise their rights. We keep patients informed of options with respect to the Company's services and financial arrangements. Even if requested, we should not offer medical advice those decisions will be deferred to the health care provider. We listen with sensitivity to patients' concerns. We protect patients' dignity; respect their cultural and psychological values; and safeguard their personal information within the limits of the law.

g) We carefully review financial relationships with physicians and other healthcare practitioners for compliance with the anti-kickback and Stark laws.

Laws and regulations put strict requirements on financial relationships between Prometheus and referring physicians. All financial agreements with physicians must be carefully reviewed and approved. There is risk whenever we give something of value (money, services, meals, gifts, trinkets, etc.) to physicians or other providers. In an effort to minimize this risk and adhere to ethical industry business practices, when applicable, Prometheus follows the *AdvaMed Code of Ethics on Interactions with Health Care Professionals*. Individuals associated with Prometheus may not offer or provide referring physicians with any benefits, compensation, or other inducements with the intent of obtaining, or in exchange for, the referral of patients. Prometheus shall not enter into any financial relationships with physicians that would violate the anti-referral prohibitions of federal, state or local anti-kickback laws or physician self-referral (i.e., Stark law) prohibitions.

h) We appropriately interact with government officials.

What is acceptable practice in a business environment, such as providing education, transportation, entertainment, or other things of value, may be entirely unacceptable and may even violate certain federal, state or local laws in dealings with government employees or those

who act on the government's behalf. Therefore, you must be aware of and adhere to the relevant laws and regulations governing relations between government customers and suppliers.

The administration and governance of federal and state healthcare programs is very complex. Therefore, when obtaining an interpretation of the many rules and policies, we work with supervisors and engage appropriate authorities (i.e., consultants, vendors, government agencies) to ensure an adequate understanding of the requirements.

i) We respect the proprietary information of others.

Just as we protect our own confidential information, we respect the proprietary and confidential information of others. In addition to safeguarding Prometheus's proprietary information, we must also protect proprietary information that belongs to other organizations or individuals. This includes, proprietary information from former employers, written materials of others, music, software, images, graphics, or other creative material without permission of the owner or creator.

j) We ensure the confidentiality of material nonpublic information.

Prometheus at times may be involved in discussions with publicly traded companies. We will not communicate material nonpublic information related to those companies, either directly or indirectly, to anyone, including family, friends, or acquaintances. Public company employees who have access to confidential (or "inside") information are not permitted to use or share that information for stock trading purposes or for any other purpose except to conduct business. All non-public information about Prometheus or about companies with whom we do business is considered confidential

k) We follow environmental regulations.

We abide by all laws, regulations, and Company policies relating to the protection of the environment. We strive to manage and operate our business in a manner that respects our environment, conserves natural resources, and complies with environmental laws and regulations. We:

- utilize resources appropriately and efficiently.
- recycle where possible and dispose of all waste in accordance with applicable laws and regulations.
- work cooperatively with the appropriate authorities to remedy any environmental contamination for which Prometheus may be responsible.

l) We cooperate with and document government inquiries and investigations.

Prometheus is regulated by federal, state and local government agencies. From time to time, we may encounter officials responsible for regulating various aspects of healthcare or other business practices.

If we receive a request for information from a government investigative agency, external surveyor, or enforcement agency, either on-site or through correspondence, we take the

following steps:

- Notify our manager and/or administrator.
- Notify the General Counsel, Compliance Officer and Chief Financial Officer.
- Carefully preserve documents related to a known or possible government investigation.

h) We are vigilant about patient safety and product quality.

Patient safety and product quality are two of the Company's highest priorities. These principles apply to all phases of a product's development, from initial research to final labeling and distribution. We all share the responsibility of upholding these principles. You should never sacrifice quality and safety to meet deadlines or targets. Rather, you are encouraged and expected to raise quality or safety concerns with your manager or through other appropriate channels. Prometheus also may provide financial support and investigational product for high-quality scientific research initiated and conducted by outside investigators. The Company's funding of such research must comply with all applicable federal regulations and Company policies and procedures so as to avoid any concern that research funding was awarded as an inducement to prescribe or utilize Prometheus products or to encourage an off-label use.

Consistent with these priorities, prompt reporting of all product complaints and/or adverse events is required in accordance with the Company's policies and procedures. This reporting, whether during an investigational trial or after approval or clearance, enables Prometheus to monitor and enhance the safety and quality profiles of its products and must be timely communicated to meet regulatory reporting requirements.

3. Supporting a Positive Work Environment

a) We are committed to equal opportunity employment and non-discrimination.

We do not discriminate or make employment decisions based on a person's race, color, ethnicity, religion, sex, sexual orientation, gender identity, national origin, age, disability, protected military or veteran status, pregnancy, or genetic information.

We have a positive and safe working environment that promotes respect and diversity. We do not tolerate conduct that disrupts our work environment including behavior that is disrespectful, hostile, violent, intimidating, threatening or harassing. Sexual or other unlawful harassment or discrimination includes any verbal, physical or visual conduct based on sex, race, age, national origin, disability or any other legally protected basis. We are expected to follow all policies regarding employee conduct that are contained in our Employee Handbook.

b) We are committed to fair practices.

We understand that the depth of talent at Prometheus comes from our diversity. By continuing to recruit the most qualified employees from a diverse pool of applicants, Prometheus is committed to equal opportunity employment. Talent and performance serve as the basis for advancement within Prometheus.

c) We document and report events so that we can improve our processes and reduce the risk of harm.

When an unexpected event impacts, or may impact, the quality of our products or services, we report these incidents through the appropriate channels.

d) We keep our workplace safe.

We follow the Company's policies regarding workplace safety. We make sure Prometheus facilities are safe places for employees and visitors. We complete required safety training. If we see a hazardous condition, we respond appropriately.

We comply with all laws, regulations, and Occupational Safety and Health standards, including those requiring Prometheus to report to authorities. As required, we report certain injuries, inspections, illnesses, and motor vehicle accidents.

e) We address inappropriate and disruptive behaviors.

We treat each other with honesty and respect. We have processes in place to address inappropriate or disruptive behaviors and performance issues through our disciplinary action processes.

f) We observe a drug-free workplace.

We protect the safety and well-being of visitors and colleagues; we commit ourselves to an alcohol- and drug- free work environment. When we report to work, we do so fit for duty and free from the influence or impairment of alcohol and drugs.

g) We maintain our required licenses and professional credentials to perform our jobs

We understand the scope of services that our licensure or credentials permit us to perform and stay within those boundaries. When a job requires a license or specific credentials, we only allow individuals with current and valid licenses and credentials to perform those functions. We do not employ or contract with individuals who have been excluded from participating in federally funded healthcare programs, nor are they permitted to practice or bill through Prometheus.

h) We encourage appropriate reporting relationships.

We avoid working relationships where one family member reports directly to another family member (including one's spouse, parents, siblings, grandchildren, etc.). In addition, we report situations to management where objectivity could be compromised or a decision inappropriately influenced because of an outside relationship (such as a dating, household or close personal relationship). If any of these situations develop, we will let management know so that the situation can be resolved. We also disclose to management any of these types of relationships we have with a Prometheus customer, supplier or business partner.

i) We are committed to non-discrimination and accessibility.

We comply with applicable federal civil rights laws. We do not discriminate against any individual on the basis of age, race, color, ethnicity or national origin, religion, creed, language, disability, socioeconomic status, sex, sexual orientation, gender identity or expression, and/or veteran status in providing care and services.

4. Protecting Privacy and Confidentiality

We are committed to safeguarding the privacy of employee and patient information.

We collect personal health information about patients in order to facilitate care from his/her treating physician and to provide certain services to the patients. Access, use, alteration and disclosure of a patient's health information is protected by federal, state and local law. We understand how sensitive this information is and maintain its confidentiality accordingly..

5. Reporting Concerns or Misconduct

We report concerns of misconduct and disruptive behaviors.

We bring concerns out in the open so that they can be reviewed and resolved quickly. Each of us is responsible to report concerns and suspected misconduct that could violate the Code, local, state or federal laws or regulations, or Prometheus policy or procedures. The General Counsel, and/or Compliance Officer, or designee will impartially and thoroughly review, evaluate and respond to allegations of misconduct, concerns and/or inquiries. All reports will be followed up on and investigated in a timely manner. *Any individual who reports a legitimate concern in good faith will be protected from retaliation or intimidation. We take concerns seriously and appreciate individuals who report concerns or misconduct. The key is to speak up.*

Report concerns to:

- Your supervisor, manager or director
- Human Resources
- General Counsel
- Chief Financial Officer
- Compliance Officer
- 24-hour confidential hotline at 1-888-PRO-RxDx
- the confidential online reporting portal at www.mycompliancereport.com/brand/rxdx.

IV. CERTIFICATION

Prometheus Code of Ethical Business Conduct

I certify that I have received and read the Prometheus Code of Ethical Business Conduct dated _____, 2021, and that I have had an opportunity to ask questions before signing this form. I certify that I will comply with the Code in all respects. I am not aware of any unreported violations of the Code and if I become aware of a violation or have a concern about a possible violation, I will raise the concern in a manner described in the Code

I understand that failure to comply with the Code can result in disciplinary action up to and including termination of my employment or my business relationship with Prometheus, as well as other legal penalties.

I understand that my employment is “at will” and that neither this Code nor any other writing or statement creates a promise or representation of continued employment (express or implied), and that my employment may be terminated at any time and I may be demoted with or without notice, cause, or reason. I understand that no experience with the Company, including any oral statements, longevity of employment, performance reviews, promotions, salary increases, and disciplinary measures, may be regarded as implicitly changing my employment at-will status.

I understand that, except for my employment at-will status, any and all Company policies and practices, including those reflected in this Code, can be changed at any time and that I am responsible for adhering to any such changes once I am notified of them.

Employee Name (Print Name Legibly): _____

Title or Role: _____

Employee Signature: _____

Date: _____