



Code of Business Conduct

2023

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Foreword by Jurgi Camblong, Co-founder and CEO

When founding the company with Pierre and Lars, in 2011, our goal was to create a tech company whose impact would significantly improve patient care. We believe our corporate DNA, rooted in quality, precision, and robustness, is the key to our success and a promise of hope for millions worldwide.

We are convinced that the long-term success of SOPHiA GENETICS depends directly on the behavior of each and every one of us. Placing ethics at the heart of our business conduct is critical for our mission to build a more sustainable global healthcare system.

Of course, this requires complying with applicable laws and regulations, but we must go further and ensure that our business decisions are guided by a true sense of integrity.

Our Code of Business Conduct was created in this spirit and sets out the ethical guidelines under which we conduct our day-to-day actions. When dealing with ethics, there are no specific rules that can apply to every situation. This Code is a tool to support our entrepreneurial spirit and guide our thinking and our behavior. It is everyone's responsibility to comply with it.



A stylized, handwritten signature in black ink, appearing to read 'J. Camblong'.

Dr. Jurgi Camblong, CEO

Message from the Executive Team

As members of SOPHiA GENETICS SA Executive Team, we are collectively in charge of fostering a healthy ethical culture in the conduct of the business.

We are fully aware of our responsibility to sustain the principles of our Code of Business Conduct, in our day-to-day work, wherever we operate in the world.



Jurgi Camblong
Chief Executive Officer



Zhenyu Xu
EVP, Chief Scientific Officer



Philippe Menu
EVP, Chief Product Officer
& Chief Medical Officer



Abhimanyu (Abhi) Verma
SVP, Chief Technology Officer



Ross Muken
EVP, Chief Financial Officer
& Chief Operating Officer



Peter Casasanto
SVP, Chief BioPharma Officer



Manuela Valente
SVP, Chief People Officer



Ken Freedman
SVP, Chief Revenue Officer



Daan Van Well
EVP, Chief Legal Officer and General
Counsel

Our Ethical Principles

Together, we unlock the power of new-generation health data to radically improve outcomes for cancer and rare disease patients around the world today and tomorrow. We are proud to bring data-driven medicine to those who need it the most, across oncology, rare and inherited diseases, infectious diseases, cardiology, neurology, and other disease areas. Our solution has supported the analysis of more than 1 million genomic profiles, leveraging our unique multi-modal capabilities.

We are committed to rooting our business decisions in a true sense of integrity and in compliance with the laws and regulations of the countries in which we operate, and we believe that taking an ethical approach is the only way to operate in the best interest of the patients and the medical community.

We also recognize that it is not always easy to navigate through ethical dilemmas. Our Code of Business Conduct should help and give guidance in case of the ethical dilemmas we will all encounter in our professional lives at a given moment.

Our Ethical Principles

Our Code of Business Conduct is our written statement describing the 3 core values and behaviors that define us:

Innovative | Curious

We are curious and constantly assess how we think, work, and communicate with each other and the institutions with which we work. We strive to identify opportunities to improve and empower each other to embrace innovation – not just in the technology, products, and solutions we create but in adopting an innovative mindset every day.

Cooperative | Collaborative

We know knowledge is power - especially when it is distributed. That is why collaboration is at the heart of everything we do. For us, democratizing data-driven medicine is essential to ensure equal access to healthcare for patients worldwide. We believe that when the right information is in the right hands, at the right time, and with the right level of confidence, better health solutions can be delivered and make life-changing differences, improving people's health across the globe.

Accurate | Reliable

Accuracy and reliability are critical to analyze complex data modalities to better understand diseases. They are at the core of everything we do, including how and why we do it.

Our Code of Business Conduct applies to all of us. This means not only to all employees (both permanent and temporary) and Board Members, but also to our contractors and distributors.

We wish to foster a culture where employees can speak out: should you have the feeling that something is wrong, don't be afraid to talk about it.

To make sure all matters are taken into consideration, we offer you the ability to sound the alarm through our dedicated Speak Up tool:

<https://report.whistleb.com/en/sophiagenetics>

Our Ethical Safeguards

Our Code of Business Conduct

Our Code of Business Conduct applies to all employees (both permanent and temporary), directors, contractors, and distributors.

This Code is an integral part of our governance and compliance organization, in order to ensure that SOPHiA GENETICS SA and, as applicable, its subsidiaries comply with applicable U.S., Swiss, and international laws and regulations. This Code is not exhaustive, and its content may be updated from time to time.

Next to this Code of Business Conduct, please also continue to follow all other SOPHiA GENETICS policies that apply from time to time.

Reporting of Any Illegal or Unethical Behavior

We encourage a culture of transparency, openness, and trust where everyone can raise concerns. Should you have a concern or the feeling that something is wrong, don't keep it to yourself.

We have set up a Speak Up tool that can be used by any employee, contractor or distributor and is available in 3 languages (English, French & Spanish) on the following website:

<https://report.whistleb.com/en/sophiagenetics>

Alternatively, if you have a concern, you may contact the Chief Legal Officer - General Counsel.

We will treat the information shared using this tool with the appropriate urgency, in full confidentiality, and we will never reveal the reporter's name without permission, unless local laws require it to do so.

However, we encourage reporters who share misconducts to be open with their identity. Any employee raising a misconduct in good faith will be strictly protected against retaliation and any employee who believes they are being retaliated against must immediately report it.



For more information:
Internal Investigation and Whistleblowing Procedures

Our Ethics Committee

Our Ethics Committee has been set up to monitor the appropriate implementation of the Code of Business Conduct and the Speak Up tool, lay down appropriate guidelines based on principles this Code defends and be proactive in assessing ethical issues linked to new projects or products when required.

Our Ethics Committee consists of permanent members and contributors, including the Chief Product Officer & Chief Medical Officer, Chief People Officer, Chief Legal Officer - General Counsel.

Our Ethics Committee guarantees strict confidentiality in handling alerts and make sure that employees who report a misconduct or a breach, in all good faith, will not be subjected to any form of retaliation (i.e. no action will be taken against them).

Our Ethics Committee acts under the supervision of the Governance, Risk, and Compliance Committee and the Nomination and Corporate Governance Committee of Board, or, in the case of (internal) accounting (controls) or auditing matters, the Audit Committee of our Board.

Reporting to a Government Agency

Employees have certain protections for cooperating with or reporting legal violations to governmental agencies or entities and self-regulatory organizations. Nothing in this Code is intended to prohibit any employee from disclosing or reporting violations to, or from cooperating with, a governmental agency or entity or self-regulatory organization, and employees may do so without notifying SOPHiA GENETICS. Our Company may not retaliate against an employee for any of these activities, and nothing in this Code or otherwise requires an employee to waive any monetary award or other payment that they might become entitled to from a governmental agency or entity, or self-regulatory organization.

Our Commitment to our Stakeholders

At SOPHiA GENETICS, we build relationships with our stakeholders based on mutual trust and respect.

The following principles of practices and behaviors are the commitments we make to each other and apply to:

- Our Employees, Contractors, and Directors
- The Patients of our Customers
- Our Shareholders
- Our Business Partners and Competitors
- Our Community

Our Employees, Contractors and Directors

We nurture a diverse and inclusive environment

Wherever we are, we want to provide a professional and safe working environment fostering a culture of respect, trust, collaboration, diversity, freedom of expression, and growth. We create work environments that preserve and value individuality and diversity. We believe that diversity in our workforce boosts employee engagement and creates an innovative, dynamic, and productive culture.

Our working environment is free from discrimination and harassment

We provide equal employment opportunities to all applicants and we do not tolerate any form of harassment or discrimination on the basis of race, color, religion and belief, national origin, gender, age, marital status, sexual orientation, disability or perceived disability, pregnancy, or medical conditions.

Harassment and discrimination may be subject to disciplinary penalties, and in many countries to criminal proceedings and termination of employment.



For more information:
SOPHiA Employee Handbook

We strive to avoid conflicts of interest

We must conduct ourselves in an honest and ethical manner and act in SOPHiA GENETICS' best interest. We must endeavor to avoid situations that present a potential or actual conflict between our individual interests and that of our company.

A "conflict of interest" occurs when a person's private interest interferes in any way, or even appears to interfere, with the interests of our company. Situations involving a conflict of interest may not always be obvious or easy to resolve. You should report actions that may involve a

conflict of interest to the Legal Department. In order to avoid conflicts of interests, employees, officers and directors must disclose to the Chief Legal Officer - General Counsel any material transaction or relationship that reasonably could be expected to give rise to such a conflict, and the Chief Legal Officer - General Counsel shall notify the Audit Committee of the Board of Directors of any such disclosure. In the event that an actual or apparent conflict of interest arises between the personal and professional relationship or activities of an employee, officer or director, the employee, officer or director involved is required to handle such conflict of interest in an ethical manner in accordance with the provisions of this Code.

We must comply with all applicable laws and regulations

When posting content on social media platforms, speaking to journalists, speaking at events or conferences, we should all remember that what we say is public and may be recorded, forwarded, or shared with others.

We are strongly committed to conducting our business affairs with honesty and integrity and in full compliance with applicable laws and regulations. No employee, officer or director shall commit an illegal or unethical act, or instruct others to do so, for any reason.

We cannot trade in securities using material non-public information

Using material non-public information to trade in SOPHiA GENETICS securities, or providing a family member, friend, or any other person with non-public information, is illegal. All material non-public information should be considered inside information and should never be used for personal gain.



For more information:
Policy Against Insider Trading
Insider Trading Guidelines

We are all SOPHiA GENETICS' ambassadors

When posting content on social media platforms, speaking to journalists, speaking at events or conferences, etc. We should all remember that what we say is public and may be recorded, forwarded or shared with others.



For more information:
Marketing & Employees Social Media Guidelines, Events & Speakers Management working instructions

Our Commitment to our Stakeholders

The Patients of our Customers

We produce quality products

Compliance with quality standards is not only important for our business, it is also critical for the patients of our customers.

To support our mission, we are ISO13485 certified and we are committed to providing the highest quality of products and services to our customers.



For more information:
electronic Quality and Information Security Management System

We fairly promote and market our products and services

Promoting our products and services with integrity and transparency is essential to determine our collaboration with customers.

Many regulations exist to protect patients from inaccurate or unfair promotion: we sell our products through accurate and truthful communications about their efficacy, quality, safety, and price.



For more information:
Promotion Compliance Guidelines

We pledge to respect the privacy of personal data and to keep it safe

As part of our business, we process and store personal and sensitive data on a daily basis. We take the privacy and security of this data and any related information seriously. Our procedures and systems, based on GDPR, HIPAA and ISO27001 requirements, are designed to adequately protect the data of our customers and the personal data of their patients.

We have appointed a Data Protection Officer, established a Data Protection Committee and implemented a compliance program to ensure the appropriate protection of such data.



For more information:
General Policy on Personal Data Protection, Information security procedures

Our interactions with healthcare professionals

We build commercial relationships with our customers and more broadly with the healthcare community to offer data and analytics services linked notably to genomic and imaging solutions.

Collaborating with healthcare professionals is key for our mission to democratize data-driven medicine and we exercise caution in our interactions with them to avoid interfering in the patient-healthcare professional relationship.

We must never bribe or offer other forms of compensation to gain business we would not have won without that. We should all be very careful: what we might consider as courtesies in other sectors may not be appropriate when interacting with healthcare professionals.

Our interactions with healthcare professionals are governed by internal rules based on US, EU, Swiss standards and local requirements when stricter.



For more information:
*Anti-Corruption Policy
HCP Interactions Handbook*

Our Commitment to our Stakeholders

Our Shareholders

We share full and accurate information

We make full, fair, accurate, timely and understandable disclosures in all material respects about our financial condition and results of operations. They include our reports and documents filed with or submitted to the U.S. Securities and Exchange Commission and Nasdaq and our other public communications.

We ensure financial integrity

We conduct our business in compliance with all laws and regulations. We apply best practices of internal controls and corporate governance to ensure the integrity of financial and accounting information and to prevent fraud. We make sure that we, as well as third parties acting on our behalf, do not get involved in situations that could prove to be fraudulent or malicious.

Our Business Partners and Competitors

We do not tolerate corruption

We strictly prohibit corruption and we ensure our business operations around the world comply with applicable anti-corruption laws. We have a zero-tolerance policy when it comes to offering, promising, giving or accepting money or anything of value (including bribes, kickbacks, illegal rebates, gifts, entertainment or travel expenses) to government officials, political parties or politicians, trade unions, employees or representatives of another company or their family members.

In addition, we refuse facilitation payments, i.e. the payment of an unofficial sum of money with the aim of facilitating, guaranteeing or speeding up the execution of an administrative decision (work permit, customs, etc.).

We all have a vital role to detect and report wrongdoing to management or through our Speak Up tool.



For more information:
[> Speak Up tool](#)
 Anti-Corruption Policy

Our perception matters for gifts and entertainment

There is one common practice which is often less clear-cut, and which requires each one of us to be extra vigilant: giving and receiving gifts and entertainment.

We must all refuse invitations, entertainment, and gifts that are intended to, or might be perceived to unfairly influence a business decision.

When confronted with an ambiguous request or proposal, we shall notify our line manager or report it through our Speak Up tool, refer to internal policies and if necessary, take advice from our Compliance Director.



For more information:
 HCP Interactions Handbook
[> Speak Up tool](#)
 Anti-Corruption Policy
 Gift & Entertainment Guidelines

We respect fair competition

We believe that free, open and fair competition is the best way to achieve progress that benefits our mission to democratize medicine.

We respect all our business partners and competitors and we intend to comply with fair competition and antitrust laws in our dealings. We refuse to participate in any illegal dealing arrangements and practices which restrict competition or are discriminatory to other market operators.

We have a responsible supplier selection

We select suppliers and sub-contractors who share the values and principles of our Code of Ethics. Our relationships with them are based on fairness and loyalty and are integral to the long-term success of our business. We will not continue to work with a supplier who is repeatedly not meeting our expectations, values and principles.



For more information:
 Suppliers and Purchasing Procedure, Supplier Selection Working Instructions

Our Commitment to our Stakeholders

Our Community

We are committed to have a positive impact

We are convinced that the long-term success of SOPHiA GENETICS is deeply connected to our ability to create value for all stakeholders.

Having a positive impact across all levels of our organization is critical to pursue our mission to build a more sustainable global healthcare system and we communicate on our ESG Impact highlighting the key areas in which we strive to create value every day,



For more information:
ESG Impact Summary

We seek to minimize our environmental impact

As a responsible corporate citizen, we always consider how our behavior in all aspects of our work impacts the environment.

Our efforts to protect the environment include cutting out unnecessary travels, allowing partial remote work to limit commuting where possible, trying to reduce our water consumption, encouraging recycling and recovering our waste.



For more information:
ESG Impact Summary

We facilitate clinical research

As of December 31, 2022, we have more than 465 peer-reviewed publications. These papers demonstrate how our solutions help drive insights and support scientists to enhance oncology and hereditary disease discoveries. We believe our technologies have the potential to revolutionize patient care across a multitude of health conditions



For more information:
ESG Impact Summary

We do not contribute to political activities

We do not finance political life (parties, politicians, institutions) in any country.

We respect our employees' right to participate in political life, but as a company, we don't engage company's funds and resources for personal political activities.

We may offer non-commercial sponsorship in line with our values

Our potential sponsorships must be justified and transparent. Any planned sponsorship must be approved by the Management Team. We ensure that charitable contributions and sponsorships, if any, are never used as a substitute for bribery.



For more information:
Anti-Corruption Policy
Sponsorships & Donations Procedure

