



## Code of Business Conduct and Ethics

Our mission is to empower people to live their healthiest lives

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## Message from our CEO, Ayub Khattak

Earlier this year, we took an important step in communicating Cue Health's Mission, Vision and Values, a framework that was built together with our board of directors, company leadership, and employees.

At Cue, our **Mission** is to empower people to live their healthiest lives. We accomplish this by delivering on our **Vision**, which is to lead the world in health technology, creating connected and intuitive health solutions. We accomplish this by enabling access to actionable health information that is personalized, proactive, and convenient for anyone, anywhere. Delivering on our vision and achieving our mission requires us to adhere to a set of **Values**, the guiding principles and fundamental beliefs that enable us to work together as one team and drive toward shared goals. Cue's values are: Build Boldly, Excel Every Day, Win Together, and Be Accountable.

We use these values as the foundational principles to further strengthen our Code of Business Conduct & Ethics. This updated guide reflects who we are as a company and the high standards to which we hold ourselves accountable, as well as with whom we conduct business. As a mission-driven company, our path to a bright future will be paved by an unrelenting commitment to integrity, honesty, and respect.

As Chairman and CEO of this incredible company, I take seriously my duty to lead according to these values, standards, and principles. Thank you for joining me in our commitment to follow our Code, live our values, and fulfill our mission.



# Cue's Mission and Vision

Our mission is to empower people to live their healthiest lives.

We can accomplish our mission by executing well on our vision. At Cue, our vision is to lead the world in health technology by creating intuitive, connected health solutions.

We accomplish this by enabling access to actionable health information that is personalized, proactive, and convenient for anyone, anywhere.

Our values are guiding principles and fundamental beliefs that enable us to work together as one team toward the same goal. Having concrete values ensures we know the behaviors expected of us to support organizational efficiency.

## Cue's four values include: **Build Boldly**, **Excel Every Day**, **Win Together**, and **Be Accountable**



**Build Boldly** speaks to Cue's creativity and innovation. It supports a culture where we aren't afraid to take risks, even if we sometimes fail. It means we have a fearless approach to solving problems, which requires us to eliminate self-limiting beliefs. It also means that we collectively believe in our unlimited potential.



Next is **Excel Every Day**, which represents our desire for excellence in everything we do. It means we awe our customers and deliver experiences that exceed expectations. This requires us to show up every day as our authentic and best selves.



**Win Together** represents the fact that none of us can be successful in our goal single-handedly. It takes a team to change the world, and we are that team. It means we leave our ego at the door and attack the problem, not a person. It means we put a great degree of confidence and trust in our people— you —to achieve success.



Our final value is **Be Accountable**, or put another way, say what you mean and do what you say. While it might sometimes be uncomfortable, choose candor over comfort. Assume that we are all working with good intentions, and in turn, make sure you act with those same good intentions.

## Compliance Commitment

Cue is dedicated to fostering a culture of ethical conduct, integrity, and professionalism. Our Code of Business Conduct and Ethics is the cornerstone of our organization's values and principles, and it guides our actions, decisions, and interactions within the company and outside of it.

Our Compliance team plays an important role in ensuring that our Code of Business Conduct and Ethics is upheld.

The Code of Business Conduct and Ethics applies to all employees worldwide, as well as officers, distributors, and independent contractors acting on behalf of Cue.

## Compliance with Laws

Cue will conduct its business and affairs in compliance with all applicable laws, rules, regulations, and in accordance with all company policies and procedures.

## Commitment to Ethical Conduct

We are committed to upholding the highest standards of ethical conduct in all aspects of our business. We believe that ethical behavior is the right thing to do and is essential for the long-term success and trust of our stakeholders.

## Compliance Training and Awareness

Training and education constitute an integral component of our ethics and compliance program. We require that all employees, regardless of their position within the organization, actively engage in the Annual Code of Business Conduct and Ethics, Anti-Corruption, Anti-Kickback, and Speak Up Hotline training. These programs serve to enhance awareness and reaffirm our commitment to uphold our Code of Business Conduct and Ethics. In addition to our annual compliance training, the Code of Business Conduct and Ethics is reinforced throughout the year with global communications that include internal articles, digital signage, leadership messaging and ethics campaigns. For more detailed information, navigate to our [Training and Education Policy](#).

## Diversity, Equity, Inclusion, and Belonging

We believe that investing our time, energy, and resources towards Diversity, Equity, Inclusion, and Belonging (“DEIB”) initiatives help us better serve our business, as well as our broader Cue Health community. Our DEIB vision statement is: “We value the unique talents and contributions of every team member. Diversity, Equity, Inclusion, and Belonging is infused in everything we do.” This serves as a representation that DEIB is in alignment with all aspects of our business, community, and company values.

## Non-Discrimination and Anti-Harassment

Cue is an equal opportunity employer. This commitment applies to all persons involved in Company operations, including but not limited to, any job applicant, employee (including temporary or seasonal), intern, or contractor. We are committed to providing a workplace free of discrimination and harassment based on characteristics protected under all applicable law, such as, but not limited to, race, color, religion (including religious accommodations), creed, sex (including pregnancy, childbirth and related medical conditions), gender (including gender identity and expression), sexual orientation, marital status, national origin (including language use restrictions), ancestry, mental and/or physical disability, medical condition (cancer, genetic information and characteristics, requests for medical and family care leave), age, military or veteran status, and any other classification protected by applicable federal, state, and local laws.



## Safe and Healthy Work Environment

Maintaining a safe workplace is essential to the Company's operations, and it is the Company's policy to promote safety on the job and to comply with applicable laws regarding safety in the workplace. All employees are responsible for their own safety, as well as others in the workplace, and are expected to assist the Company in maintaining safe working conditions. For more detailed information, see Cue Policy, Human Rights at Cue

## Exclusion and Background Screening

We have established an exclusion screening process to regularly check employees, contractors, vendors, and other stakeholders against federal and state exclusion lists. For more detailed information, navigate to our [Exclusion and Background Screening Policy](#)

## Privacy

The security of your privacy and personal information is of utmost importance to us. We understand that the responsible handling of personal data is not just a legal obligation but a fundamental aspect of our commitment to ethical conduct and corporate responsibility.

Personal data is any information that can identify an individual. Cue follows the California Consumer Privacy Act (CCPA) as amended by the California Privacy Rights Act (CPRA), state comprehensive privacy laws in the United States (US), and other US federal and state laws regarding personal data. This includes the Health Insurance and Portability Act of 1996 (HIPAA), where Cue acts as a Business Associate to a Covered Entity. Regardless of what privacy law applies, Cue is committed to ensuring that the rights and protections of individuals is honored.



## Fair Labor Practices

Cue employment practices are required to comply with all applicable laws and regulations, including those related to hours, compensation, opportunity and working conditions. We recognize that each employee has the legal right to make informed decisions regarding their membership in associations or labor unions, free of coercion.

## Commitment to Human Rights

Respect for human rights is a fundamental value of Cue and stems from our Core Value of Win Together. The Company strives to increase the enjoyment of human rights within the communities in which we operate and respect and promote human rights in accordance with the UN Guiding Principles on Business and Human Rights. Our Human Rights policy is a cornerstone in these endeavors and reflects some of Cue's core values and principles. Cue is committed to treating all our stakeholders — including our employees, customers, shareholders and suppliers, and the communities in which we operate—with dignity, respect, and equality, and to partnering with our stakeholders to help them to do the same. For more detailed information, see Cue Policy, Human Rights at Cue.



## Speak Up Hotline

The Speak Up Hotline is dedicated to providing a safe and confidential platform for individuals to report concerns. Our primary objectives are to promote transparency, accountability, and a culture of communications within our organization.

We prohibit retaliation against any individual who reports concerns or provides information through our Speak Up Hotline in good faith. Retaliation is a violation of our organization's values and will not be tolerated.

All reports are taken seriously and will be investigated promptly and impartially. Appropriate actions will be taken to address and rectify any identified issues.

You may speak up directly to

- Your manager or any member of management
- HR Business Partner
- Any member of Compliance and/or Legal Teams
- [compliance@cue.me](mailto:compliance@cue.me) or [legal@cue.me](mailto:legal@cue.me)
- Compliance Committee

You may speak up anonymously.

- From any computer by going to:  
[www.cuehealth.ethicspoint.com](http://www.cuehealth.ethicspoint.com) and clicking on "Make A Report."
- In the U.S, Guam, Puerto Rico, and Canada by calling toll-free.  
**1-844-944-3405**
- Available 24/7

Regardless of the reporting method, your report will be confidential & anonymous if requested. We encourage all employees to report any suspected violations of our Code of Business Conduct and Ethics through appropriate channels. For more detailed information, navigate to our [Reporting Compliance Issues](#) and [Non-Retaliation Policy](#)

## Environmental, Social, and Governance

At Cue, we are sincerely committed to conducting our business in a manner that reflects our firm dedication to Environmental, Social, and Governance (ESG) principles. Our dedication is deeply embedded in our corporate culture and aligns seamlessly with our core mission and values. We acknowledge that responsible business practices contribute to our long-term success and helps underscore our responsibility to promote positive change in the global community and safeguard the environment.

### Cue Kindness

Our dedication to creating a positive impact is at the heart of our mission. We are committed to fostering growth opportunities, strengthening our communities, and championing health and well-being, while actively seeking to make a positive impact. Through strategic partnerships with various organizations, we actively contribute to these goals by generously providing COVID-19 tests and readers. Our team members wholeheartedly volunteer their time and expertise to support Cue Kindness volunteer opportunities, further demonstrating our commitment to making an impact. For more information or questions relating to Cue Kindness, please contact [culture@cue.me](mailto:culture@cue.me)

### Social Media at Cue

We recognize the importance of social media in today's interconnected world. Social media provides a platform for communication, networking, and engagement with our stakeholders, including employees, customers, partners, and the public. In line with our company value of "Be Accountable," our social media Policy outlines our expectations for responsible and respectful use of social media by our employees and representatives. For more detailed information, navigate to our [Social Media Policy Document](#)

## Interactions with Government Officials

We maintain a strong commitment to conducting our interactions with government officials in adherence to the highest standards of ethical conduct, transparency, and compliance with all relevant laws and regulations, including those enforced by the Office of Foreign Assets Control (OFAC). At Cue, we do not engage in, support, or tolerate improper payments, gifts, or favors to government officials with the intent to improperly influence a decision to obtain an unfair advantage. When engaging with government officials and their employees, it is crucial to avoid any actions that could be construed as an attempt to influence their decisions.

## Anti-Corruption and Anti-Bribery

Cue is committed to conducting all business operations in alignment with the highest ethical standards and in strict compliance with all applicable laws and regulations. We maintain a zero-tolerance policy towards corruption and bribery, applicable at all levels of our organization. Our employees are strictly prohibited from engaging in any form of corruption or bribery, including the offering, receiving, soliciting, or provision of bribes or any other improper advantages, whether directly or indirectly. For more detailed information, navigate to our [Anti-Corruption Policy](#)

## Political or Other Contributions

Cue recognizes the importance of civil engagement and charitable activities as fundamental rights of its employees. You are free as a private citizen to participate in the political process, express your political views, or advocate for religious and charitable organizations. However, such activity should not incorrectly imply the Company's endorsement, or create a conflict of interest. You must comply with all political, campaign finance, and ethics laws concerning contributions to political parties or candidates.

Cue Health prohibits offering philanthropic support to non-religious organizations with a written policy of discrimination against any of the protected classes outlined in our Equal Opportunity Employer (EEO) Policy. The Company's funds, services, facilities, or assets may not be used on behalf of a political party or candidate in an election for local, state, or federal office unless approved by General Counsel by email [Legal@cue.me](mailto:Legal@cue.me)

## Insider Trading

Cue plays fair in the financial markets by refraining from using non-public information for our personal benefit or benefit of family, friends or others. We strictly prohibit any form of insider trading. It is a violation of our policy to buy, sell, or otherwise trade in securities while in possession of material non-public information about our company. For more detailed information, navigate to our [Insider Trading Policy](#)

## Conflicts of Interest

At Cue, we take our responsibility to prevent conflicts of interest seriously. We hold ourselves accountable for identifying and addressing situations that could jeopardize the fairness and objectivity of our decision. In the event of conflicts, we are committed to immediate disclosure and take necessary steps to mitigate them. For more detailed information, navigate to our [Conflicts of Interest Policy](#)

## Gifts and Gratuities

Employees and contractors shall not accept or offer gifts, gratuities, or benefits to clients, suppliers, partners, or other external parties that could be perceived as an attempt to gain an unfair advantage, influence decision-making, or violate applicable laws or regulations. Reasonable and customary business courtesies, such as modest meals may be offered to clients or business partners as long as they are directly related to a legitimate business purpose and are in compliance with all company policies.

## Engaging with Healthcare Professionals, Including Promotional Activities, Marketing and Sales

Cue's mission in engaging with healthcare professionals is to promote ethical, transparent, and compliant interactions that prioritize patient care and mutual respect. Our aim is to actively contribute to the healthcare process, advance medical knowledge, and enhance patient care through responsible engagement with healthcare professionals. When our interactions involve payments, meals, travel, or other benefits, we ensure compliance with all applicable laws and regulations. This commitment is reinforced by our dedication to providing these benefits for legitimate and well-documented business needs, aligning with our shared goal of "Win Together."

Our commitment also extends to our promotional activities, marketing, and sales with a specific focus on healthcare professionals. We aim to benefit the healthcare industry while embodying our commitment to ethical conduct, transparency, and the delivery of exceptional value. Our goal is to establish enduring relationships, all while upholding the highest standards of integrity. For more detailed information, navigate to our [Payments to Healthcare Professionals](#) and [Gifts, Meals, Entertainment and Travel Policy](#)

## Reporting Adverse Events and Product Complaints

Cue is committed to providing products and services that are safe, effective, and of the highest quality. We prioritize the safety and well-being of our employees, customers, and stakeholders. Contact Cue Health Customer Support at [support@cuehealth.com](mailto:support@cuehealth.com) or call toll-free at **833.CUE.TEST (833-283-8378)** if any component is missing or damaged or if a cartridge foil pouch is not sealed. You may also contact Cue Health Customer Support to request a physical copy of the instructions For Use and the Quick Reference, free of charge.





## Accuracy of Company Records and Public Reports

As a publicly traded company, ensuring accuracy in our financial reporting is not only a legal obligation, but also a fundamental aspect of our dedication to transparency. We recognize the importance of maintaining accuracy in our company records, financial responsibility, and public records. All company records, financial statements, and public reports must be prepared with accuracy and precision. All data and information presented in records and reports must be reliable and accurate.

In the event that records are placed on legal hold, we are obligated to preserve those records and adhere to any instructions from our legal department. Furthermore, they contribute to our compliance with standards established by the Securities and Exchange Commission (SEC) and other regulatory bodies, elevating our standing with stakeholders and reinforcing our reputation.

## Fair Competition

We are committed to fair competition, and we value accountability in all our actions. We understand that competing fairly is not only a legal requirement but also an essential ethical principle. We strictly prohibit any actions that violate fair competition, including but not limited to price-fixing, bid-rigging, and market allocation. These practices are not only unethical but also illegal under anti-trust laws. This commitment ensures that competition thrives on innovation, quality, and service, resulting in benefits for our customers, partners, and the entire industry.

## Copyrights, Intellectual Property, and Trade Secrets

We are firmly dedicated to upholding the highest ethical and legal standards regarding intellectual property. We recognize that respecting the intellectual property rights of others is not merely a legal obligation, but also a foundational element in nurturing innovation and preserving our reputation. Never use confidential information or trade secrets from a former employer to conduct business for Cue.

## Information Security

Our Information Security mission is to safeguard our data and technology assets with strong dedication. We are committed to ensuring the confidentiality, integrity and availability of our information systems and sensitive data. Our goal is to protect against cyber threats and vulnerabilities while fostering a culture of security and awareness.

## Third-Party Relationships

We are committed to ethical and responsible behavior in all our interactions and extend this commitment to our dealings with third-party partners and stakeholders. All individuals and entities representing Cue, including third parties and stakeholders, are expected to adhere to all relevant laws and regulations. We actively promote ethical conduct, champion fair competition, and maintain our commitment against bribery and corruption.

## Waivers of the Code

Any waiver of this Code for our executive officers and directors may be made only by our Board of Directors and will be disclosed to the public as required by applicable law or securities exchange regulations.

Waivers of this Code for other employees may be made only by our Compliance Officer or General Counsel and will be reported to our Compliance and/or Audit Committee.

## Dissemination

This code is distributed and acknowledged by all employees, including new hires, and is reviewed annually to ensure compliance and understanding.