

California Compliance Declaration

Exact Sciences Health Care Compliance Program

Exact Sciences Corporation (collectively with its subsidiaries, the “Company”), is committed to conducting its business activities with integrity and in compliance with applicable laws, regulations, industry codes of conduct, and the Company’s Health Care Compliance Program. The Company’s compliance policies are intended to further this commitment by providing an overview of the laws, regulations, and the Company’s policies and guidelines that govern the Company’s business practices.

1. Compliance Leadership

The Company has a Chief Compliance Officer who is responsible for overseeing the Company’s Health Care Compliance Program, including responsibilities for developing, operating, and monitoring the compliance program. The Chief Compliance Officer reports on a regular basis to the General Counsel, Board of Directors, Chairman & CEO, and Compliance Committee.

2. Written Standards

The Company has adopted compliance policies that guide the Company’s day-to-day operations and set forth the expectations for all officers, employees, and agents (“Personnel”) of the Company, including policies that govern the Company’s employee interactions with health care professionals in accordance with the U.S. Department of Health and Human Services Office of Inspector General’s Compliance Program Guidance (“OIG Compliance Program Guidance”) and the AdvaMed Code of Ethics on Interactions with U.S. Health Care Professionals (“AdvaMed Code”).

Annual Spend Limit for California Health Care Professionals

The Company has adopted policies and procedures that help ensure that the Company operates in accordance with the OIG Compliance Program Guidance and the AdvaMed Code guidelines. The Company has also established a total annual dollar limit on items of value (including meals), and activities that the Company may provide to a California-licensed health care professional in accordance with Section 119402 of the California Health & Safety Code. The Company has established an annual aggregate limit per California health care professional which is maintained by the Compliance Department and applies to Exact Sciences as a company. This annual limit may be revised by the Company from time to time.

The following are exempt from counting towards the Company’s annual aggregate dollar limit:

- Financial support for CME programs;
- Financial support for health educational scholarships; and
- Fair market value payments provided for a health care professional’s professional services (e.g., consulting activities).

3. Education and Training

The Company is committed to effectively educating and training its Personnel, including the sales and marketing staff, on the Company’s marketing code of conduct and related compliance policies. New employees receive training as part of their initial onboarding and existing employees receive compliance training on at least an annual basis. The Company also periodically reviews and updates its training programs to identify any potential new areas for training and to ensure the program aligns with the Company’s compliance policies.

4. Effective Lines of Communication

The Company maintains an open line of communication between the Compliance Department and all of the Company's employees. The Company expects Personnel and vendors who do business with the Company to report concerns over possible misconduct, potential conflicts, or known violations of the compliance policies and/or other Company policies and procedures to any manager, the CCO, or General Counsel.

The Company's employees may contact the Compliance Department directly in any of the following methods:

- Email: compliance@exactsciences.com
- Mail: 5505 Endeavor Lane, Madison, WI 53719
- Phone: 1-608-284-5700

The Company also established an anonymous system to receive complaints or for employees to seek information or advice on questions anonymously via the Integrity Alertline. Personnel may also make reports anonymously by contacting the Integrity Alertline.

We also encourage our Personnel to ask questions about any activity where they are unclear about a potential violation or application of our Compliance Program. Questions may be addressed through any of the established channels described above.

The Company has also adopted procedures to protect the anonymity of complainants and to protect whistleblowers from retaliation. The Company does not permit acts of retaliation or retribution against an employee or officer who in good faith reports a potential, suspected, planned or actual violation or application of the Company's compliance policies and any such actions will be dealt with appropriately.

5. Auditing and Monitoring

The Company's Compliance Department has the responsibility of developing a plan for auditing and monitoring compliance with the Company's compliance policies and implementation of such policies and other guidelines or practices. Through these audits, the Compliance Department can identify potential or existing problems or areas of concern and take corrective action in an effort to prevent the recurrence of non-compliance as needed. The nature of these audits and reviews, the extent of the audits, and the frequency with which the Compliance Department performs such audits varies due to a variety of factors, including new regulatory requirements, changes in Company practices, and other relevant considerations.

6. Enforcing Standards through Well-Publicized Disciplinary Guidelines

The Company's compliance policies and procedures put employees and agents, including management, on notice that noncompliance will have disciplinary consequences, up to and including termination of employment.

7. Responding to Potential Violations and Corrective Action Procedures

The Company's Compliance Department oversees the review and investigation of noncompliance reports and/or allegations and suspected cases of misconduct brought to the Compliance Department's attention.

The Company is committed to taking steps to correct misconduct, which may include administering discipline, up to and including dismissal, where necessary. The Company's Compliance Officer oversees implementation of corrective measures in response to findings of noncompliance, such as retraining, increased monitoring, and warnings.

Annual Declaration: July 1, 2025

In accordance with California Health & Safety Code sections 119400 and 119402, the Company believes that it has adopted a compliance program as required by California law that is, in all material respects, in accordance with the applicable portions of the OIG Compliance Program Guidance, consistent with the AdvaMed Code guidelines, and includes an annual limit for certain items and activities given to health care professionals covered by this California law. As of the date of the declaration, the Company believes that it is in compliance with the Company's compliance policies and the above-referenced California requirements in all material respects.

In accordance with the Company's understanding of the California statute, this declaration is limited to those activities undertaken by the Company that are directed to California.

A copy of this document may be obtained by calling 1-608-284-5700.