

"TEMPUS

Code of Conduct

Our mission is to help patients
live longer, healthier lives through
precision medicine.

Message from our Founder & CEO



To the Tempus Community:

At Tempus, our mission is to help patients live longer, healthier lives through precision medicine. We help healthcare professionals make real-time, data-driven decisions to deliver personalized patient care and, in parallel, facilitate discovery, development, and delivery of optimized therapeutic options for patients.

To fulfill our mission, we must demonstrate our unwavering respect for patients, our team members, and stakeholders, and we must comply with our ethical duties across all areas of our business. Ethics and integrity are essential parts of our culture and are fundamental to our success. To that end, we must always conduct ourselves and our business with honesty, fairness, transparency, and accountability.

This Code of Conduct serves as our guide for daily decision-making. We are each responsible and accountable for our individual actions. Remember, Tempus' ability to serve patients is in the hands of each and every one of us.

I trust every Tempus staff member at all levels of the organization to adhere to this Code and embody its values in their actions and behaviors. I expect our leaders and managers to lead by example, acting as role models. Every member of our Leadership Team is personally committed to this Code of Conduct, and I expect the same commitment from each of you. Thank you for continuously doing your best for each other, for patients, and for our broader community.

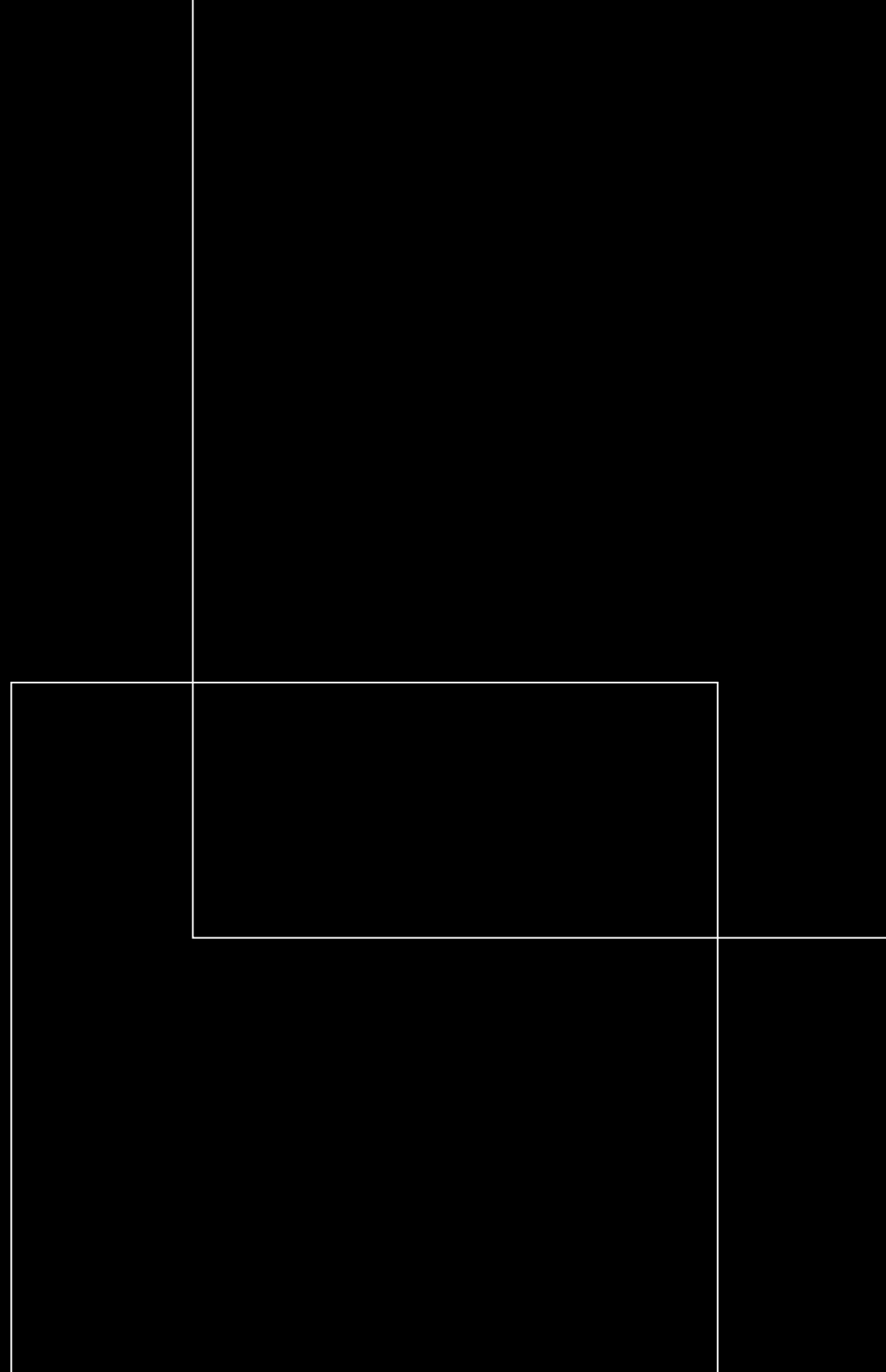
Eric Lefkofsky
FOUNDER AND CEO

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01

Tempus values



We are on a mission to revolutionize how data is used to personalize and optimize patient care. We are all here to do the right thing for patients and build a better tomorrow.

Our values keep us on the right path.

✓ **It's About Patients.**

We never lose sight of the patient. Every product we build, every service we offer, is designed to make a difference in patients' lives by using data and technology to improve the therapies available to them. Empathy is key to our success and we never put ourselves above our mission. We know that building a successful company is directly connected to helping patients. We cannot do one without the other, and we apply our combined expertise and effort toward that end.

✓ **It's About Perspective.**

We zoom out. We take a step back from the data - or a single event - to see the full picture. We take a long-term approach and know that the road to ushering in precision medicine is filled with a series of small steps that together, transform outcomes for patients. We approach every day with optimism, knowing that while the path in front of us may be long, it is the right path to be on.

✓ **It's About Time.**

We move fast. There are many important things to do. We know which ones are critical and focus on those with intensity. We have a bias to execution because we understand that time is of the essence for the patients that we serve.

✓ **It's About Respect.**

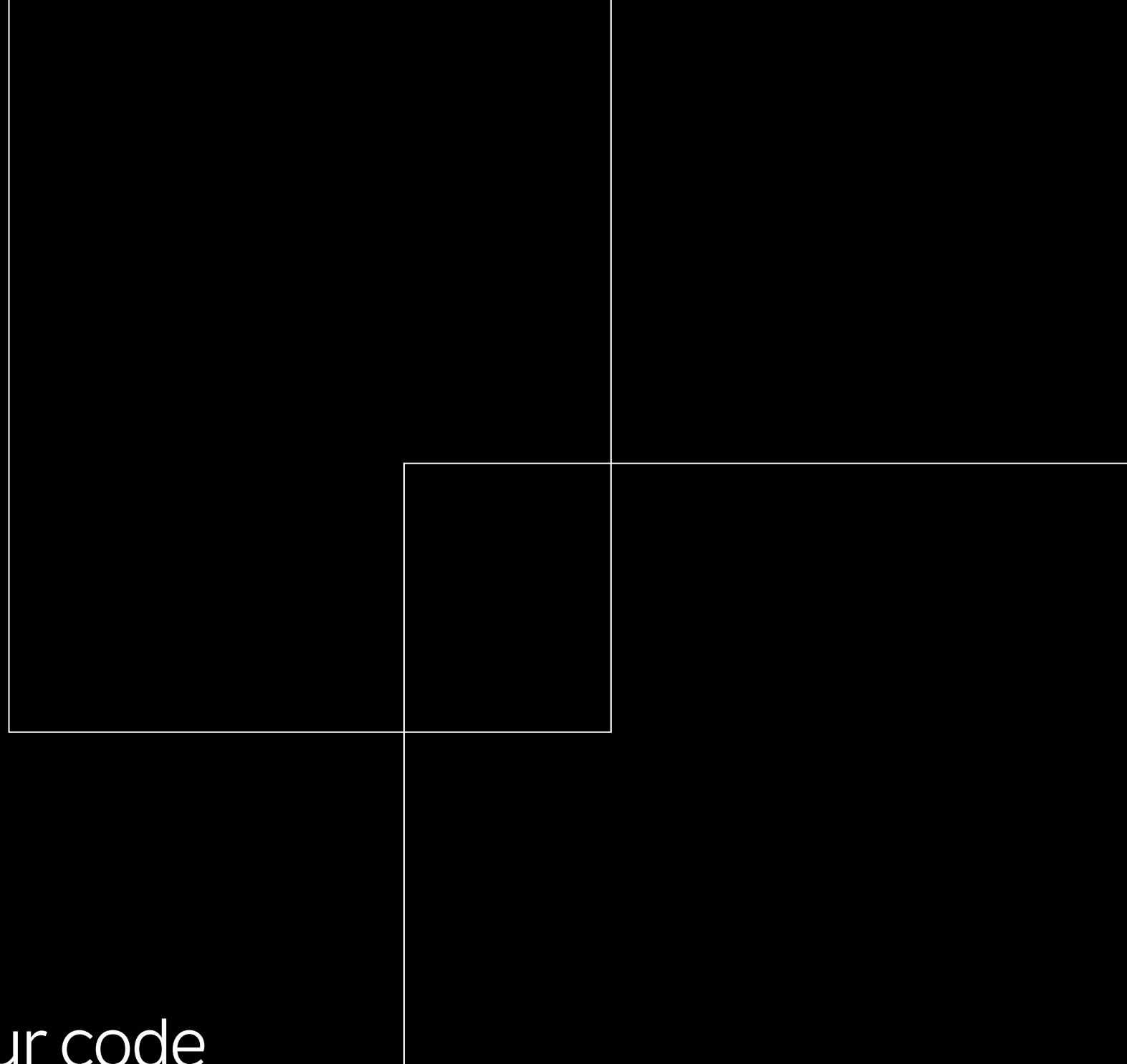
We are assertive and brave, but equally mindful and controlled. We are aggressive in our pursuits, but not with each other. We bring a point of view, while accepting that our perspective may not always prevail. We check our ego at the door and value diverse perspectives. We seek them out. We listen to, and are inspired by, all of our colleagues, whether or not we share the same point of view.

✓ **It's About Learning.**

We lead with substance and look for opportunities to stretch ourselves beyond what we know today. We have an awesome capacity to learn quickly and operate comfortably in ambiguity, confident in our ability to work on a problem and figure it out. We acknowledge our failures, quickly focusing on what we learned and what we can do better.

✓ **It's About Saving Lives.**

We recognize that we are in battle. We are here to win for patients – period. We recognize that winning requires a relentless army, united. We are in this fight together and it is not one that any of us can win alone.



02

Understanding our code

Understanding our code

Purpose

Tempus is committed to interacting with our community – patients, customers, business partners, employees, regulators, or investors – with integrity and in compliance with all applicable laws, regulations, and industry codes of conduct. This Code of Conduct outlines the shared expectations and standards for conducting our business in an honest, ethical, and compliant manner.

Adhering to the Code

The Code applies to everyone at every level of Tempus. This includes employees, officer, directors, and anyone conducting business on Tempus' behalf, such as contractors, consultants, and suppliers. Regardless of job responsibilities, title, or function, each of us is responsible for following the Code and serving as a role model for our peers.

How to Use the Code

At times, you must make tough decisions, especially when crafting novel solutions to longstanding challenges. Those decisions must be made in accordance with this Code. While the Code and its policies do not and cannot answer how to act in every possible situation, this Code lays out key principles to help guide us in our daily work.

Read it, use it, apply it. Ask questions when in doubt, and speak up if you have any concerns. If you find yourself in a gray area, reach out to your manager, People Operations, or the Legal Team for guidance and keep these principles in mind. We call them the 3Ps of Compliance.

PURPOSE

Why am I doing this?

Is it the right thing to do?

Is it legal?

PROCESS

Did I follow the right steps?

Did I get required approvals?

Did I check with the right internal experts?

PERCEPTION

Is it in line with Tempus' values and the Code?

How would this look to patients, teammates, or regulators?

Would I be comfortable describing my actions to someone I respect?



Tempus is committed to interacting with our community [...] with integrity and in compliance with all applicable laws, regulations, and industry codes of conduct.

Ask Questions

Acting with integrity means always being truthful, accountable, and doing the right thing. While this sounds simple, sometimes it can be difficult in practice. We work in a very complex environment where we may encounter situations with unclear or conflicting goals.

Managers and senior leadership are available to answer questions and are generally most familiar with the Code and other Tempus policies that apply to the activities in your department.

People Operations can explain and answer questions about employment policies, benefits, and workplace issues.

The Legal Team can provide guidance about how to conduct business in a way that meets our legal obligations, and offer advice and guidance on our interactions with healthcare professionals and government officials and on the privacy and protection of personal information.

Quality and Regulatory Affairs can explain and answer questions regarding the quality, safety, and regulatory compliance of our products and services.

Information Security is available to answer questions about how we protect Tempus' assets, equipment, information, and records.

REMEMBER, YOU ARE NOT ALONE

When in doubt, ask questions, seek further guidance, and raise concerns. Take advantage of the breadth of capabilities, resources, and expertise that exist throughout Tempus.

Managers' Responsibilities

Everyone at Tempus is responsible for complying with legal, regulatory, and industry requirements. Managers, however, have a special, additional responsibility to serve as a positive model and to help others stay on track.

All managers should create an environment where ethical behavior is a fundamental expectation and people are comfortable speaking up without fear of retaliation.

OUR EXPECTATIONS: Act as a role model, demonstrate high ethical standards at all times, and be mindful of your role and responsibility.

- 1 Ensure that team members understand and meet their responsibilities to abide by this Code and all Tempus policies.
- 2 Emphasize that outcomes matter, but how we achieve those outcomes also matters.
- 3 Take seriously any concern raised by a team member and quickly escalate issues to the right people at Tempus.



Act as a role model, demonstrate high ethical standards at all times, and be mindful of your role and responsibility.

Voicing Your Concerns

Calling out potentially illegal, unethical, or even uncertain actions is everyone's responsibility. You should ask questions and escalate good faith concerns. If you become aware of a situation that may involve a violation of our Code or any applicable law or policy, you have a duty to report it right away.

How to ask questions or voice your concern depends on the nature of the issue, your own comfort level in reporting, the people involved, and local or geographic laws and regulations. You may report issues to your manager, People Operations, or the Legal Team. Sometimes you may want to ask a question or raise a concern anonymously, which you can do via our ethics hotline at [800.461.9330](tel:8004619330) (toll-free) or at ethics.tempus.com.

If any investigation indicates that a violation of this Code has probably occurred, we will respond appropriately under the circumstances. Any employee, officer or director responsible for a Code violation will be subject to disciplinary action up to, and including, termination.

Non-Retaliation Policy

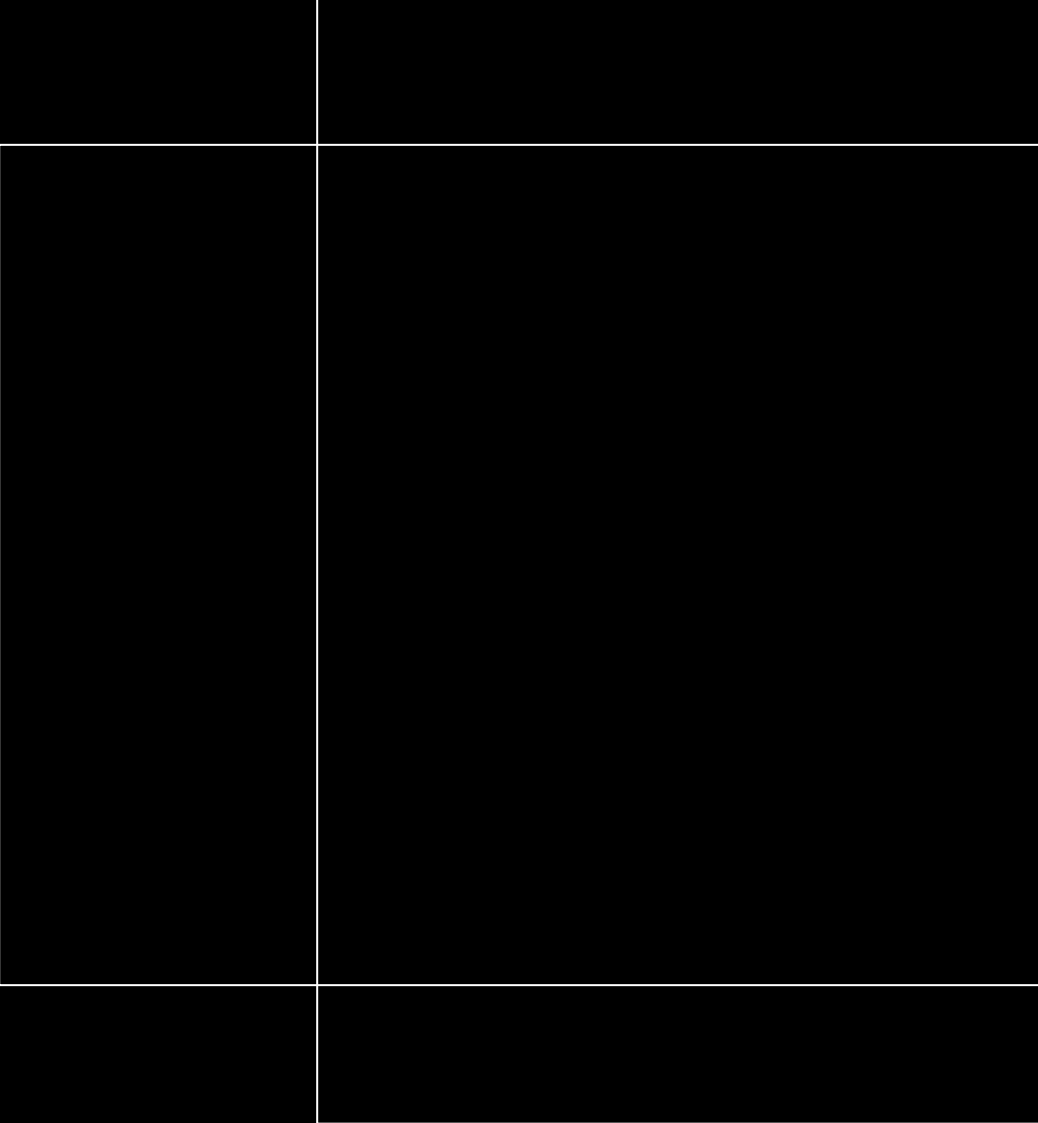
We don't tolerate retaliation against someone who seeks advice, raises a concern, reports misconduct, or provides information in an investigation. Some examples of retaliation include denial of benefits, termination, demotion, suspension, threats, harassment or discrimination. Anyone who engages in retaliation will face discipline, up to and including termination.

Other Resources

In addition to this Code, please consult our Employee Handbook, our Healthcare Compliance Guide, our Insider Trading Policy and our HIPAA Compliance Policy for more detailed information about our ethics and compliance program.

Waivers

Any waiver of this Code for Tempus executive officers or directors may be authorized only by our Board of Directors or, when permitted, a committee of the Board of Directors, and will be disclosed to stockholders as required.



03

Creating a respectful work environment

Creating a respectful work environment

To realize our full potential, Tempus is committed to the fair and equal treatment of all employees and staff. We expect you to treat everyone with respect and we do not tolerate discrimination or harassment in the workplace.

Diversity and Inclusion

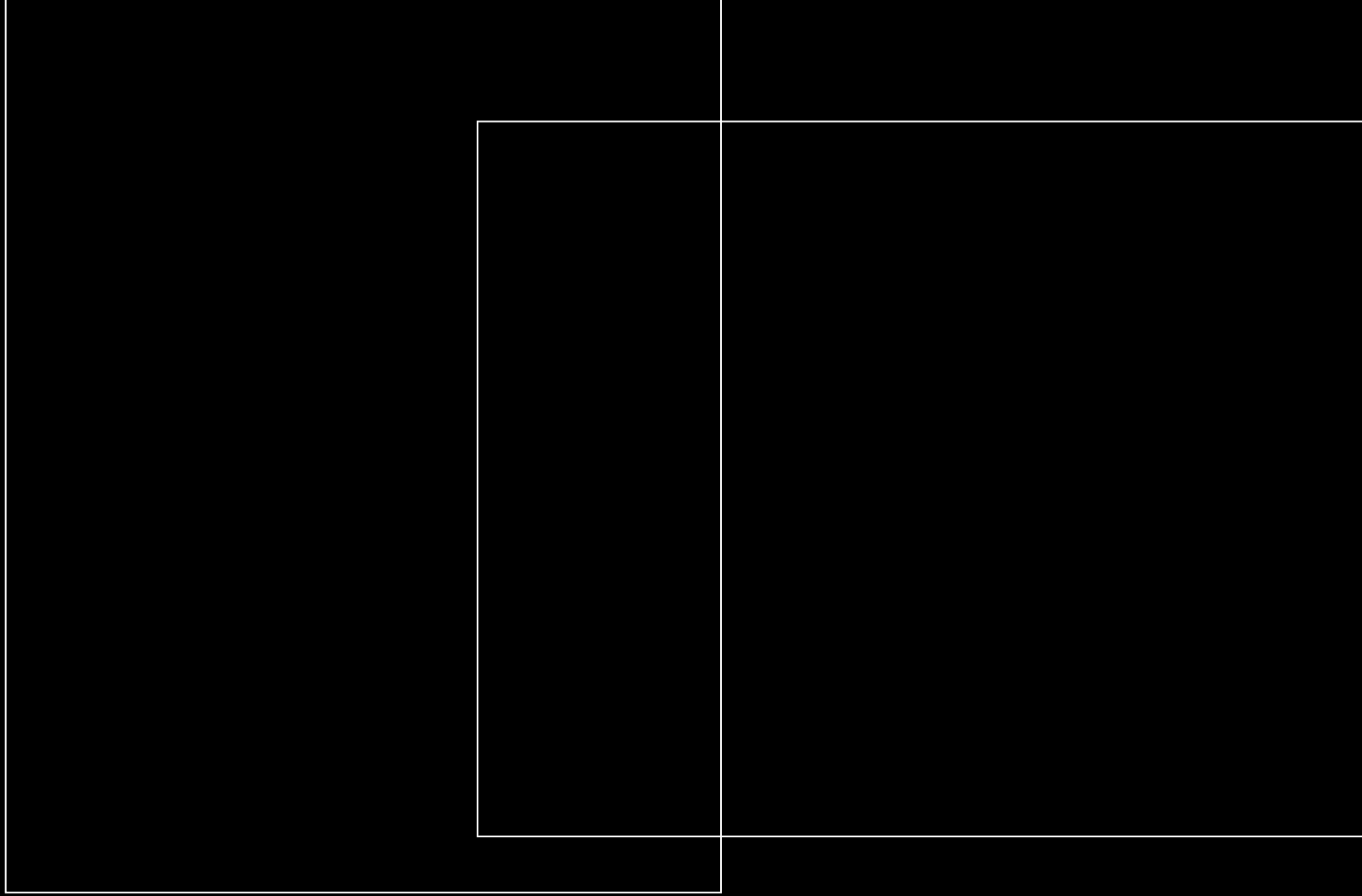
Tempus' inclusive culture means that we value the differences in our colleagues and work to create an environment where we have the ability and opportunity to share new ideas. We will only hire, retain, or promote based on individual merits and qualifications. These actions may never be done on a discriminatory basis such as race, religion, gender, color, ethnic or national origin, age, disability, sexual orientation, gender identity and/or expression, or marital status.

Fostering a Culture that Allows Individuals to Succeed

We are all entitled to a workplace that is free from harassment. Harassment can include, but is not limited to, any behavior that creates an intimidating, offensive, or hostile work environment, such as name calling, slurs, bullying, or unwelcome comments, touching, or advances, or behavior that unreasonably interferes with an individual's ability to work. We do not accept harassment in any form against anyone. Period. If you become aware of or suspect harassment in the workplace, report it right away.

Confidential Information

Tempus employees have access to non-public and other confidential information of Tempus, Tempus' business partners, and other third parties. We are trusted with this information on the expectation that we will protect it and use and disclose it only in limited circumstances.



04

Promoting integrity in our relationships with others

Promoting integrity in our relationships with others

We are harnessing the power of data and artificial intelligence to improve healthcare. While our technology is new, the laws and regulations that apply to our business are not. Compliance with legal and regulatory requirements is a prerequisite for Tempus to serve our mission.

Accordingly, we respect and follow laws and regulations, particularly in our interactions with competitors, healthcare organizations and providers, payers, and government agencies.

Interactions with Healthcare Organizations and Providers

We regularly engage with healthcare providers and organizations in a variety of ways. They and their patients use our services and provide feedback on our offerings. Sometimes these interactions involve us providing them with items of value. For example, we may provide business meals during sessions when we educate them about our products, or pay them for providing services to us, such as consulting, speaking or research.

At the same time, patients expect the care they receive to be based on their individual needs and on the professional judgment and experience of their healthcare provider, separate and apart from any commercial or personal interests. Tempus is committed to protecting the independent medical judgment of healthcare providers from improper influences and to complying with all applicable anti-kickback and anti-bribery laws.

For more information, please consult the Healthcare Compliance Manual.



Compliance with legal and regulatory requirements is a prerequisite for Tempus to serve our mission.

Interactions with Government

Government entities, officials, and employees (collectively “government officials”) play an important role in healthcare and technology regulation. Tempus employees must always participate in a constructive, transparent, and responsible dialogue with government officials by providing and exchanging relevant and honest information and following all applicable laws, including the Lobbying Disclosure Act and the Honest Leadership and Open Government Act. Before interacting with government officials, seek approval and guidance from the Legal Team.

We cooperate and comply with governmental investigations and requests for information, while also protecting the legal rights of Tempus and its employees. We also cooperate with government officials who may inspect our facilities or investigate our activities. When inquiries occur, consult with the Legal Team before submitting to any interviews, answering questions, producing documentation, or discussing compliance.

Selection of and Interactions with Business Partners

Tempus expects all of its employees to conduct their interactions with vendors and business partners with integrity and in full compliance with applicable laws. Tempus should conduct business with vendors who share and embrace the letter and spirit of this Code and our values.

Avoid Conflicts of Interest

We owe a duty to Tempus, each other, and our shareholders to put Tempus’ interests above our own when it comes to how we do our job. Our personal interests should not inappropriately influence our professional judgment. By recognizing and taking proactive steps to prevent conflicts of interest, or even the appearance of conflict, we send a clear message about our commitment to Tempus’ integrity and doing what’s right.

Conflicts of interest arise when a Tempus employee’s personal interests or responsibilities (financial or otherwise) are inconsistent with those of Tempus. We should not take part in or try to influence any decisions or situations in which we have a conflict of interest. The best course of action is to disclose the facts early and often, discuss the situation, and decide with your manager on an appropriate solution.

If you are involved in selecting a Tempus business partner or vendor, follow any applicable internal policies and processes and make decisions based on Tempus’ needs and objective criteria – never on personal bias, benefit, or interests.

EXAMPLES OF POTENTIAL CONFLICTS OF INTEREST:

Interested Party Transactions: Having a personal interest, financial interest, or potential gain in any Tempus transaction, separate from being a Tempus employee or shareholder.

Gifts: Accepting gifts, discounts, favors, or services from a potential or existing supplier or vendor. Gifts from suppliers/vendors can be accepted in limited circumstances. Consider whether (a) the gift is modest or customary, (b) the gift is of a nominal value, (c) the supplier/vendor regularly gives gifts to all of its clients, (d) the gift is equally available to all Tempus employees, and (e) the gift would potentially impact or influence business objectivity.

Close Personal Relationship – Business Transactions: Awarding business to a company owned, operated, or controlled by a family member or someone with whom you have a close, personal relationship.

Close Personal Relationship – Hiring: Hiring or supervising family members or someone with whom you have a close, personal relationship.

Conflicting Employment: You or a family member working or consulting for a competitor or a potential competitor. Conflicting Investments: Owning or having a substantial interest in a competitor.

Conflicting Investments: You or a family member working or consulting for a competitor or a potential competitor.

Boards: Serving as a board member for an outside commercial organization.

Outside Projects: Working on other projects separate from Tempus that interferes with your ability to fulfill your responsibilities to the Tempus business, team, and shareholders.

If you have any questions about a potential conflict or if you become aware of an actual or potential conflict, you should discuss the matter with your manager or the Legal Team.

OUR EXPECTATIONS: Talk to your manager or discuss with the Legal Team if you believe you have an actual, perceived, or potential conflict. Secondary employment requests must be approved in advance by People Operations. Avoid situations in which your personal interests may conflict with those of Tempus.

Be wary of tapping into personal or family relationships when conducting Tempus business.

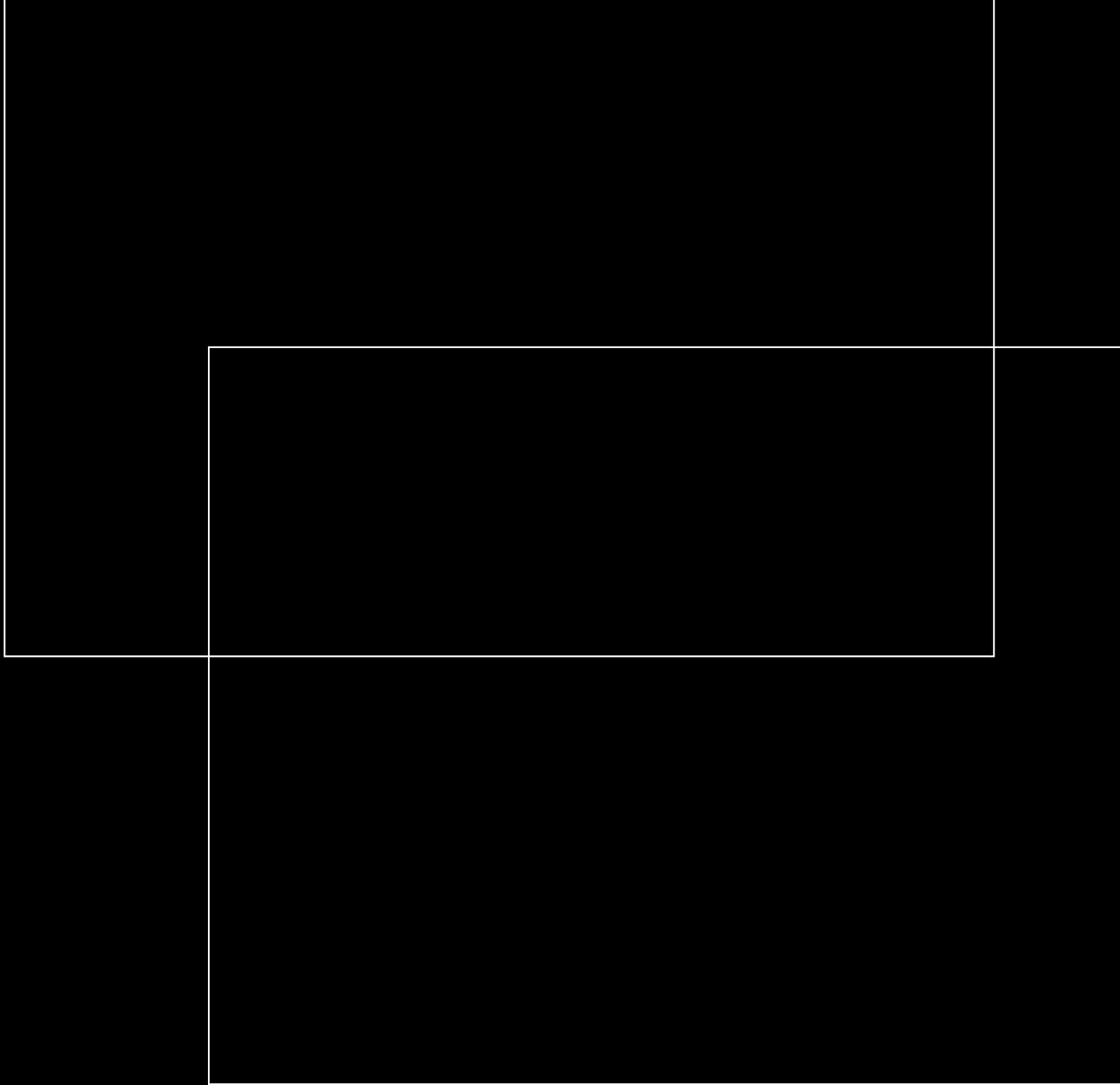
Gifts

Meals, gifts, and hospitality can sometimes be appropriate in the context of authentic working relationships. But they must be moderate and done transparently to avoid being misunderstood or perceived as inappropriate. Extravagant meals, lavish gifts, and VIP treatment, whether we are giving or receiving them, can create the wrong perception and undermine trust. We are also subject to stricter rules when it comes to gifts, meals, entertainment, and other business courtesies provided to healthcare providers and organizations, payers, and government officials.

If in doubt about the appropriateness of accepting or offering a gift, meal, entertainment, or other business courtesy, contact the Legal Team.

Corporate Opportunities

You may not take personal advantage of opportunities that arise from your position with us or through your use of Tempus' 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 Legal Team.



05

Complying with applicable laws

Complying with applicable laws

Our success depends upon everyone operating within legal guidelines and cooperating with applicable authorities. We expect the entire Tempus community to understand the legal and regulatory requirements applicable to their areas of responsibility.

Fair Competition and Antitrust Laws

We compete vigorously, fairly, and honestly. We do not collude with other companies competing in our space or share sensitive business information with them. Tempus further prohibits illegal agreements between companies, such as price fixing, as well as other unfair trade practices that restrict competition. If a competitor attempts to engage you in a discussion regarding illegal competitive activities, stop the conversation immediately and report the interaction to the Legal Team.

At the same time, we do not disparage or make untrue statements about our competitors' products or services. Instead, we stress the advantages that we have to offer and only make accurate and fair comparisons between our offerings and those of our competitors.

Gathering information about our competitors is a legitimate business practice. We do it fairly and legally, and never through fraud, misrepresentation, deception, breaching a nondisclosure agreement, or other illegal or unethical means. We also respect the confidentiality of others' confidential information and expect the same from them. If you receive a competitor's confidential information inadvertently, do not copy or forward it to others. Immediately report the incident to your manager or to the Legal Team and follow their instructions.

OUR EXPECTATIONS:

- 1 Use good judgment when dealing with competitors or others.
- 2 Obtain permission before sharing any sensitive business information.
- 3 Do not solicit confidential information from anyone who does not have the right to share that info with Tempus.



**We compete vigorously,
fairly, and honestly.**

Anti-Corruption

Tempus rejects and prohibits all forms of corrupt business behavior, such as bribery, kickbacks, illegal payments, embezzlement, fraud, theft, and granting of improper advantages. You are not allowed to give, promise, solicit, or accept any form of improper advantage, directly or indirectly, to or from any individual or entity with the intention to obtain or retain business in return.

International Trade

We follow U.S. import and export laws and regulations no matter where in the world we perform our work. We also follow the laws and regulations of the countries in which we export or import products.

Intellectual Property

Tempus' intellectual property include patents, copyrights, trademarks, product designs, brand names and logos, research and development, inventions, and trade secrets. We must secure and protect the use of these assets. At all times, you should take precautions to protect our intellectual property, including avoiding talking about or sharing such information in public places. Any suspected theft of intellectual property or unauthorized use or disclosure, or access to, intellectual property should be immediately reported to your manager or to the Legal Team.

In addition to our own protection efforts, intellectual property laws protect Tempus' valuable assets and govern our rights in such assets. Tempus complies with all applicable intellectual property laws and will defend its intellectual property rights from violation, or potential or threatened violations. Likewise, we respect the intellectual property rights of others.

Data Privacy

We are trusted with patient, customer, and employee data as part of running our business. Protecting it, and using it responsibly, is essential to our mission and everything we do. We are committed to collecting, maintaining, using, and disclosing all sensitive data in a lawful, fair, legitimate, and ethical way and to respecting individuals' privacy rights:

Rights of individuals: Tempus provides individuals with appropriate notice, choice, consent, and access to their personal data in accordance with applicable laws, regulations, and industry codes.

Controls on Information: Tempus has procedures and mechanisms implemented to maintain information security, integrity, and quality.

Information Life Cycle: Tempus has procedures and mechanisms to address issues that arise during information lifecycles, including information collection, use and disclosure, management, storage and destruction.

Data privacy and protecting sensitive information are everyone's responsibility. If you ever have questions about the use or disclosure of personal or other sensitive data, do not hesitate to contact the Legal Team for guidance.

OUR EXPECTATIONS:

- 1 Handle personal data and other sensitive information securely; speak up if something looks wrong.
- 2 Collect, maintain, use, and disclose data in accordance with applicable privacy and data protection laws and Tempus' policies.
- 3 Provide clear notice to customers and employees about collecting and using their data.

Securities Laws and Insider Trading

While engaged in Tempus business, you may have access to or learn of confidential or proprietary information that has not been disclosed to the public. It is illegal to buy or sell securities (for example, stocks, bonds or options) of a company when you are aware of "inside information"—material, non-public information — relating to the company. It is also illegal to discuss such information with others outside of Tempus. Please consult the Tempus Insider Trading Policy for more detailed information about these requirements.



Tempus is committed to collecting, maintaining, using, and disclosing all sensitive data in a lawful, fair, legitimate, and ethical way.

Financial and Business Records

Our shareholders depend on our honesty and integrity, particularly when measuring the financial performance or strength of Tempus. It is crucial that we maintain ethical and honest accounting practices at all times and so that our company's financial information is accurate and complete. We require that:

- no entry be made in our books and records that intentionally hides or disguises the nature of any transaction or of any of our liabilities or misclassifies any transactions as to accounts or accounting periods;
- transactions be supported by appropriate documentation;
- the terms of sales and other commercial transactions be reflected accurately in the documentation for those transactions and all such documentation be reflected accurately in our books and records;
- employees comply with our system of internal controls; and
- no cash or other assets be maintained for any purpose in any unrecorded or "off-the-books" fund.

We also rely upon our accounting and other business and corporate records in preparing publicly filed reports. Employees who contribute in any way in preparing or verifying these reports should strive to ensure that our financial disclosure is complete, accurate and transparent.

Communicating About Tempus

We only disclose material information about Tempus to the public through specific limited channels to avoid inappropriate publicity and to ensure that all those with an interest in Tempus will have equal access to information. If you are contacted by the media about Tempus, direct all inquiries to our Communications Team. Let them handle it and do not respond unless authorized by them.

Website Disclosure

This Code will be posted on Tempus' website. Tempus will state in its annual proxy statement that this Code is available on our website and provide the website address.

We are a team
with a singular
shared goal:
**improve patient
outcomes.**

LEARN MORE AT [TEMPUS.COM](https://tempus.com)

"TEMPUS