



Integrity Commitment and Compliance Program

Focus Diagnostics adheres to a policy of full compliance with the laws and regulations governing its business, not only as a legal obligation, but also because it is the right thing to do.

The *Integrity Commitment* is the foundation of Focus Diagnostics compliance program. The *Integrity Commitment* was created to protect and promote the Company's commitment to compliance.

As a corporate priority, we expect and work to ensure that each of our employees understands and complies with all compliance policies and ethical guidelines. This includes adherence to the Company's *Code of Business Ethics (Code)*. The *Code* describes the standards of business conduct required of all Focus Diagnostics employees, executive officers and directors. The principles set forth in the *Code* are supported by the Company's *Vision* and *Values*, the *Integrity Commitment*, the specific and detailed policies and practices contained in *Your Compliance Policy Handbook* and in other relevant Company policies and procedures. The company provides this framework of principles and procedures to help ensure consistency and alignment between what we say we value and what our actions demonstrate we value.

As a Company, we affirm our ongoing commitment to establishing policies and developing effective internal controls that will promote adherence to our standards of business ethics, our compliance policies and procedures, and the requirements of federal, state and private health care programs, and applicable FDA requirements.