# ORASURE TECHNOLOGIES, INC. FAIR DISCLOSURE POLICY

## **September 26, 2016**

#### 1. General.

OraSure Technologies, Inc. (the "Company") is committed to fair disclosure of information about the Company without advantage to any particular analyst or investor, consistent with the Securities and Exchange Commission's Fair Disclosure Regulation ("Regulation FD") which became effective October 23, 2000.

The Company and its management believe it is in the Company's best interest to maintain an active and open dialogue with stockholders and potential investors regarding the Company's historical performance and future prospects. The Company can best create stockholder value by publicly articulating its strategies, business strengths, and growth opportunities through an active dialogue. At the same time, we will also guard the Company's need for confidentiality about key business and operating strategies.

The purpose of this Policy is to establish guidelines to ensure compliance with Regulation FD, and avoid selective disclosure of non-public material information. This policy applies to the Company and its subsidiaries, including DNA Genotek, Inc. ("DNAG")

## 2. Authorized Company Representatives.

- a. Persons permitted to communicate on behalf of the Company or its subsidiaries to investors or potential investors, financial analysts, securities brokers and dealers, and financial institutions (by telephone, fax, e-mail or in person) (each, an "Authorized Contact") will be limited to the Company's Chief Executive Officer ("CEO"), Chief Financial Officer ("CFO") and General Counsel ("GC").
- b. Except for the Authorized Contacts, directors, officers and employees of the Company or its subsidiaries will not be permitted to (a) respond to inquiries from or initiate communications with investors or potential investors, financial analysts, securities brokers or dealers, or financial institutions, or (b) attend private meetings or tours of the Company's or DNAG's facilities with investors or potential investors, financial analysts, securities brokers or dealers, or financial institutions, in each case without the prior approval of the CEO or CFO. All such inquiries, contacts and in-person meetings or tours of the Company's or any of its subsidiaries' facilities with such persons must be cleared with the CEO or CFO and must include the CEO, CFO or GC.
- c. Directors, officers and employees of the Company or its subsidiaries other than the Authorized Contacts, may communicate with investors or potential investors, financial analysts, securities brokers or dealers, or financial institutions as part of the Company's normal investor relations program including conference calls with investors and analysts, only with the approval of the CEO or CFO. In such instances, an Authorized Contact must also be present.

- d. All information conveyed to investors or potential investors, financial analysts, securities brokers or dealers, or financial institutions must be limited to (i) information included in press releases issued by the Company or its subsidiaries, (ii) information presented during a conference call with analysts conducted in accordance with Section 4 below, (iii) information included in the Company's SEC filings, or (iv) publicly available, industry-related information.
- e. The Company's representatives should invoke the provisions of the SEC's safeharbor for forward-looking information whenever it is possible that discussions or responses to questions may include such forward-looking information. All safe-harbor language shall be reviewed by the GC.
- f. The CEO, CFO and GC will be responsible for (1) interrupting the conversation when a question is asked that is likely to result in the disclosure of material nonpublic information, and (2) assessing whether the conversation has resulted in the inadvertent disclosure of material nonpublic information for purposes of determining whether the Company is required to issue promptly a press release (or otherwise disseminate the information publicly, as described below in Section 8 below).
- g. If a person other than an Authorized Contact receives an inquiry from someone outside the Company or its subsidiaries for material non-public information for example, seeking guidance about the Company's financial results or seeking confirmation of a rumor involving the Company that person should not respond and instead should obtain the inquiring party's name and telephone number and provide that information to a member of the Fair Disclosure Committee for response.

#### 3. Fair Disclosure Committee.

- a. A Fair Disclosure Committee consisting of the CEO, CFO and GC will be responsible for interpreting and assuring compliance with this Policy.
- b. The Fair Disclosure Committee will be responsible for (a) reviewing Company and its subsidiaries information to determine materiality, (b) monitoring public disclosures and maintaining a record of material information that is "public" and "non-public," and (c) informing the Authorized Contacts of information that is material and non-public and, therefore, prohibited from analysts/investor communications unless and until public dissemination. In this regard, it is important to note that this Policy and the SEC rules may not be avoided through the individual disclosure of immaterial items of information which, when viewed as a whole, would be deemed material.
- c. The Fair Disclosure Committee will also be responsible for reviewing content on the Company's and its subsidiaries' websites on a regular basis to assure compliance with this Policy, including removal of "stale" information and use of appropriate disclaimers and other warnings to deter reliance on "old" data.

## 4. Public Disclosure of Material Information.

- a. As a general matter, the Fair Disclosure Committee shall be responsible for determining the content, form and timing of public disclosure of material information, consistent with the Company's legal responsibilities and best interests of the Company.
- b. The Company will issue press releases disclosing its quarterly and annual financial results and other material information, through widely communicated news and wire services.
- c. The Company will conduct conference calls with analysts or investors in connection with the announcement of financial results and may decide to conduct such calls when other material information is announced. Such calls will be conducted on a fully accessible, non-exclusionary basis through a webcast or telephonic means. All conference calls will be announced in advance via a press release. The timing of the advance announcement should be at least two days (more or less, depending upon special circumstances).
- d. The Company may permit a limited number of persons listening to a conference call to ask questions, as long as all listeners can hear the questions and answers.
- e. Audio replays and/or written transcripts of each conference call will be made available to the public for a minimum of one week afterwards, and the advance press release will describe this policy.
- f. As a general matter, if the Company desires to disclose projections of its financial performance, it will provide such disclosure (including updates) at the time it discloses its quarterly or annual financial results in press releases and/or during properly noticed, publicly accessible conference calls with analysts and investors. Such projections or updates may be publicly disclosed at other times only with the approval of the CEO, CFO or GC.

## 5. Analyst Models, Reports and Forecasts.

The Company maintains a routine practice of reviewing analyst reports, models and forecasts. In so doing, the following policies must be followed:

- a. Only Authorized Contacts may review and comment upon such reports, models and forecasts.
- b. Review of such reports, models and forecasts must be limited <u>only</u> to checking the accuracy of historical facts and the factual description of the Company and its subsidiaries. No comments should be made concerning forward-looking information developed by an analyst.
- c. The analyst must be advised in writing that it is the Company's policy to review such reports, models and forecasts <u>only</u> to check the accuracy of historical facts and the factual description of the Company and its subsidiaries.

#### 6. Public Releases and Presentations.

- a. The Company may participate in securities firm-sponsored and other investor conferences. It will be the Company's practice to issue media releases in conjunction with the major presentations scheduled during the year.
- b. All press releases and presentation materials (speeches, slides, etc.) for analyst/investor conferences and meetings must be reviewed and approved in advance by the Fair Disclosure Committee.
- c. A Company spokesperson participating in a conference should adhere to the script (if one is prepared) or to the slides or other presentation materials prepared for the conference and should not disclose any material non-public information about the Company during the conference, including during any "break-out" or question-and-answer sessions.

## 7. Responding to Rumors.

- a. From time to time, the Company or its subsidiaries may receive inquiries about market or media rumors. An example of this might be a rumored merger or acquisition involving the Company or action by the FDA with respect to one or more of the Company's or subsidiary's products.
- b. Only Authorized Contacts should respond to an inquiry about a market or media rumor.
- c. As a general matter, the appropriate response to any rumor should be that it is the Company's policy not to comment on rumors or speculation. Any exceptions to this policy must be approved by the Fair Disclosure Committee.

#### 8. Procedures for Unauthorized Disclosures of Material Information.

- a. The Fair Disclosure Committee will establish a procedure for the public dissemination of material non-public information which has been disclosed in an unauthorized manner (simultaneous for intentional disclosure to analysts and investors; not more than 24 hours or the opening of the next NYSE trading day, whichever is later, for unintentional disclosures).
- b. This procedure will include (i) review of the information to be disclosed (or unintentionally disclosed) to determine materiality and whether the information has already been disclosed to the public; (ii) preparation of a public announcement, press release, Form 8-K, website posting, etc., as appropriate; (iii) timely dissemination of such information through the Company's selected methods; and (iv) maintenance of a permanent record of compliance.