

ORASURE TECHNOLOGIES, INC.

FAIR DISCLOSURE POLICY

November 19, 2024

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 (“SEC”)’s Fair Disclosure Regulation (“Regulation FD”).

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, the Company will also guard its need for confidentiality about key business and operating strategies.

The purpose of the Fair Disclosure Policy (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.

This Policy does not replace the primary responsibility of each employee to understand and comply with the prohibitions on selective disclosure and other disclosure obligations under the federal securities laws. All directors, officers and employees should also carefully review the Company’s Insider Trading Policy, Corporate Governance Guidelines and Code of Business Conduct and Ethics, which also contain provisions relating to the proper disclosure of material information relating to the Company.

2. Regulation FD Compliance.

It is the policy of the Company that material nonpublic information about the Company may not be disclosed on a selective basis in order to be compliant with Regulation FD. Regulation FD requires that whenever a “senior official” of the Company *intentionally* discloses “material” nonpublic information about the Company to “market participants” or stockholders, the Company must widely disseminate that information to the public at large either simultaneously or in advance. Regulation FD also requires that, whenever material nonpublic information has been *inadvertently* disclosed by senior officials on a selective basis to market participants or stockholders, the Company must promptly disclose that same information to the general public. Regulation FD does not apply to disclosures made to persons who owe a duty or trust or confidence to the issuer (e.g., the Company’s attorneys, auditors or advisors or persons who have agreed in writing to maintain the confidentiality of communicated information).

- “Senior officials” include any director (including any non-employee director), executive officer, investor relations or public relations officer or other person who regularly communicates with market participants about the Company.

- Information is “material” if there is a substantial likelihood that a reasonable investor would consider the information important to a decision to buy, hold or sell shares and would therefore be likely to affect the price of the shares. Either positive or negative information may be material. Material developments may relate to (i) information regarding the Company’s or its subsidiaries’ revenues or earnings; (ii) the status of U.S. Food and Drug Administration (“FDA”) or other regulatory submissions, approvals, investigations, reviews, audits or other actions or proceedings; (iii) major litigation and disputes with significant business partners; (iv) the public or private sale of additional securities of the Company; (v) a merger or acquisition involving the Company or its subsidiaries; (vi) a tender offer by the Company for another company’s securities or for the Company’s securities by a third party; (vii) senior management changes; or (viii) significant changes regarding the business of key customers or suppliers.
- “Market participants” include broker-dealers (including employees of broker-dealers, such as analysts and investment bankers), investment advisers, institutional investment managers and investment companies, including venture capital and private equity funds.

Monetary penalties and other sanctions may be imposed on both the Company and its senior officials if (a) material nonpublic information is intentionally disclosed on a selective basis and at the time of disclosure the senior official either knew or was reckless in not knowing that the information was both material and nonpublic or (b) material nonpublic information is inadvertently disclosed on a selective basis and then not subsequently publicly disclosed if the senior official learns of the inadvertent disclosure and knows or was reckless in not knowing that the information was both material and nonpublic. Accordingly, the Company’s policy is to immediately disclose material information by a broadly disseminated press release and a Current Report on Form 8-K (a “Form 8-K”) if it discovers that material information has been disclosed on a selective basis under the circumstances covered by Regulation FD (and in no event after the later of 24 hours or the commencement of the next day’s trading).

3. 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” and collectively the “Authorized Contacts”) 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 any of its subsidiaries’ 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 safe-harbor 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.

4. 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.

5. 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. Such announcement shall disclose the date and time of the call, webcast or presentation, the subject matter and instructions for how to access the call, webcast or presentation. The timing of the advance announcement should be at least two days (more or less, depending upon special circumstances).

d. Where material, nonpublic information regarding the Company is likely to be disclosed at a presentation to be made at an investor or industry conference, the Company shall webcast the presentation (preceded by advance public notice) or, prior to or simultaneously with such conference, issue a broadly disseminated press release or file or furnish a Form 8-K with the SEC disclosing such information.

e. 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.

f. 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.

g. 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.

h. If oral disclosures including non-generally accepted accounting principles, or GAAP financial measures, will be made during a conference call, webcast or presentation, the Company shall post any quantitative reconciliation requirement of Regulation G on its website not later than simultaneously with the disclosure of the non-GAAP financial measure and, during the call, webcast or presentation, shall advise the conference call, webcast or

presentation audience of the availability and location of this disclosure. In addition, each conference call, webcast or presentation that includes a non-GAAP financial measure should be preceded by the following statement:

On this [conference call, webcast or presentation] we may refer to certain non-GAAP financial measures, such as [list non-GAAP financial measures to be used]. You can find a tabular reconciliation of these non-GAAP financial measures to the most directly comparable GAAP measures [in our earnings release][on the investor relations page of our website].

- i. Each conference call, webcast and presentation that contains or is likely to contain a forward-looking statement by the Company should be preceded by a statement containing the following required “safe harbor” disclosures for protection under the Private Securities Litigation Reform Act of 1995 consistent with the example set forth below:

Before we begin, I would like to briefly discuss the use of forward-looking statements on this conference call. Statements we make on this call may include statements which are not historical facts and are considered forward-looking within the meaning of the securities laws, and which are usually identified by the use of words such as “anticipates,” “believes,” “estimates,” “expects,” “intends,” “may,” “plans,” “projects,” “seeks,” “should,” “will” and variations of such words or similar expressions. We intend these forward-looking statements to be covered by the safe harbor provisions for forward-looking statements contained in Section 27A of the Securities Act of 1933 and Section 21E of the Securities Exchange Act of 1934 and are making this statement for purposes of complying with those safe harbor provisions. These forward-looking statements reflect our current views about our plans, intentions, expectations, strategies and prospects, which are based on the information currently available to us and on assumptions we have made. Although we believe that our plans, intentions, expectations, strategies and prospects as reflected in or suggested by those forward-looking statements are reasonable, we can give no assurance that the plans, intentions, expectations or strategies will be attained or achieved. Furthermore, actual results may differ materially from those described in the forward-looking statements and will be affected by a variety of risks and factors that are beyond our control including, without limitation, those set forth in [our earnings release issued earlier today][the prospectus for our recent offering of ordinary shares that was filed with the SEC on [___]][Item 1A. Risk Factors of our Annual Report on Form 10-K for the year ended December 31, [___], as updated by our subsequently filed Quarterly Reports on Form 10-Q and our other SEC filings]. We assume no obligation to update publicly any forward-looking statements, whether as a result of new information, future events or otherwise.

- j. Conference calls must be accessible by dial-in conference call or by Internet simulcast and archived on the Company’s website for 30 days.

6. 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 only 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 only to check the accuracy of historical facts and the factual description of the Company and its subsidiaries.

7. 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. When the Company wishes to disclose material, nonpublic information to the public, the information must be widely distributed to comply with SEC and stock exchange requirements. The normal means of such distribution should be a press release. 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. Information contained in a press release may also be widely distributed by filing or furnishing the information with or to the SEC in a Form 8-K. The Company, in consultation with legal counsel, will be responsible for determining whether a press release should also be filed or furnished using a Form 8-K.

d. Press releases regarding the Company's historical financial results or earnings or guidance about future financial performance must be furnished on a Form 8-K with the SEC within four business days of such release. The issuance of such press releases should be made not more than 48 hours prior to any conference call or webcast relating to such release and the related Form 8-K will be filed or furnished with the SEC prior to any such conference call or webcast, in order to avoid having to also furnish a transcript of such conference call or webcast to the SEC.

e. Each press release with financial information should be carefully reviewed to determine if it contains any financial measures that are not prepared in accordance with GAAP. Any press releases that contain non-GAAP financial measures must include the most directly comparable GAAP measure in an equally or more prominent presentation and a quantitative reconciliation, by schedule or other clearly understandable method, of the differences between the non-GAAP financial measure and the most directly comparable

GAAP measure. In addition, the Company must provide a statement of the reasons why management believes that each non-GAAP financial measure provides useful information to investors and, if applicable, a statement of additional purposes for which management uses each non-GAAP financial measure. The earnings press release or other announcement (along with any required Regulation G disclosures for any non-GAAP financial measures to be discussed during the call or webcast that were not included in the earnings press release) should be posted on the Company's website not later than the time of the conference call or webcast.

f. Each press release that contains a forward-looking statement by the Company should also include the following required "safe harbor" disclosures for protection under the Private Securities Litigation Reform Act of 1995 consistent with the example set forth below:

Statements we make in this press release may include statements that are not historical facts and are considered forward-looking within the meaning of Section 27A of the Securities Act of 1933 and Section 21E of the Securities Exchange Act of 1934, which are usually identified by the use of words such as "anticipates," "believes," "estimates," "expects," "intends," "may," "plans," "projects," "seeks," "should," "will" and variations of such words or similar expressions. We intend these forward-looking statements to be covered by the safe harbor provisions for forward-looking statements contained in Section 27A of the Securities Act of 1933 and Section 21E of the Securities Exchange Act of 1934 and are making this statement for purposes of complying with those safe harbor provisions. These forward-looking statements reflect our current views about our plans, intentions, expectations, strategies and prospects, which are based on the information currently available to us and on assumptions we have made. Although we believe that our plans, intentions, expectations, strategies and prospects as reflected in or suggested by those forward-looking statements are reasonable, we can give no assurance that the plans, intentions, expectations or strategies will be attained or achieved. Furthermore, actual results may differ materially from those described in the forward-looking statements and will be affected by a variety of risks and factors that are beyond our control including, without limitation, [list relevant factors], as well as those set forth in [the prospectus for our recent offering of ordinary shares that was filed with the SEC on [___]][Item 1A. Risk Factors of our Annual Report on Form 10-K for the year ended December 31, [___], as updated by our subsequently filed Quarterly Reports on Form 10-Q and our other SEC filings]. We assume no obligation to update publicly any forward-looking statements, whether as a result of new information, future events or otherwise.

g. Nasdaq rules require that the Company provide notification of certain material news announcements to the StockWatch section of Nasdaq's MarketWatch department at least ten (10) minutes prior to the release of such information. In the event of unusual or very material disclosure, it is possible - and at times desirable - for trading to be halted for a short period of time while the information is publicly disseminated and the market has the opportunity to review the information. Whether a trading halt is appropriate is a matter that should be discussed with the GC and Nasdaq.

h. All press releases should, at a minimum, be provided to the major wire services (e.g., Dow Jones, Bloomberg, Reuters, AP, UPI and Business Wire) as well as the local press. All press releases should be kept available on the Company's website for a period of at least twelve (12) months, with older information archived in a designated "archive" section on the Company's website.

i. 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.

8. 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.

9. Postings on the Company's Website

The Company shall treat all disclosures on the Company's website like press releases and other written Company Statements. The Company shall establish procedures for reviewing and maintaining the content of all company-controlled web pages, approving all new material postings and directing the removal of any previously-posted, "stale" information. Only specifically authorized Company personnel may post content on company-controlled web pages. Before posting information on the Company's website, Company personnel must ensure that appropriate public disclosure has been made of any such information that could include or refer to material, nonpublic information.

The Company will be responsible for reviewing all links to third party websites. By linking to third party websites, the Company risks being deemed to have "adopted" or "endorsed" statements made on that third party website for purposes of the federal securities laws. Accordingly, the Company will be responsible for ensuring that an "exit screen" is used for all third party links. Such exit screen could read as follows:

Exit

You are leaving OraSure Technologies, Inc.'s website. You may return to OraSure Technologies, Inc.'s website by [using the "Back" button on your Web browser toolbar] [closing the window to the third party website that you have opened]. Do you wish to continue?

[YES] [NO]

When you are ready to return to OraSure Technologies, Inc.'s website, simply [click the "Back" button on the toolbar of your Web browser until you are back where you left off] [close the window to the third party website that you have opened].

Even though the Company controls much of the content on official Company Social Media pages, such as LinkedIn, the Company does not control all the information on such websites and, in addition, cannot provide a click-through exit screen for links to additional third party sites present on such Social Media sites. As a result, the Company will ensure that "exit screens" are used for links to all third party websites, including official Company Social Media sites.

In determining whether to post links to third party websites, the Company must be careful not to "cherry-pick" and post only the most favorable information to the Company. This applies whether the Company is linking to news articles, analyst reports, scholarly papers or any other third party information concerning the Company and whether such links are provided on the Company website or official Company Social Media pages. The purpose of not cherry-picking is to avoid the risk that stockholders or the SEC find the Company's disclosures materially misleading due to omissions.

10. Social Media

The Company is committed to preventing inadvertent disclosures of material nonpublic information, preventing unwitting participation in potential Internet-based securities fraud or market manipulation and avoiding the appearance of impropriety by persons associated with the Company. Social Media use requires extra vigilance to ensure employees do not communicate in a way that violates applicable law or this Policy. "Social Media" is generally defined to mean websites and applications that focus on communication, community-based input, interaction, content-sharing and collaboration; examples include Facebook, Instagram, X (formerly known as Twitter) and LinkedIn.

Accordingly, except where previously authorized in writing by the GC, employees are prohibited from making statements via Social Media, or any other similar medium, in the name of the Company or in a manner that could reasonably be attributed to the Company without prior written authorization by the GC.

In engaging in Social Media, employees must abide by the following restrictions and guidelines:

- You are required maintain the confidentiality of the Company's trade secrets and private or confidential information.

- Do not post any of the Company’s internal reports or other internal business-related confidential communications.
- It is important that you respect financial disclosure laws. It is illegal to communicate or give a “tip” on inside information to others so that they may buy or sell stocks or securities. Such online conduct may also violate our Insider Trading Policy.
- You may not create a link from your blog, website or other social networking site to any of the Company’s websites without identifying yourself as one of our employees.
- If the Company is a subject of the content you are creating, be clear and open about the fact that you are an employee and make it clear that your views do not represent those of the Company, fellow employees, customers, suppliers or people working on our behalf. If you do publish a blog or post online related to the work you do or subjects associated with the Company, make it clear that you are not speaking on behalf of the Company. It is best to include a disclaimer such as “The postings on this site are my own and do not necessarily reflect the views of OraSure Technologies, Inc.”
- If you find mistakes or erroneous information concerning material, nonpublic information about the Company on Social Media, you should not try to “correct the record” but rather report it to the GC.

11. 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.

ACKNOWLEDGMENT

I hereby acknowledge that I have read, that I understand, and that I agree to comply with the Fair Disclosure Policy of OraSure Technologies, Inc. I also understand and agree that I will be subject to sanctions, including termination of employment, that may be imposed by the Company, in its sole discretion, for violation of such Fair Disclosure Policy.

Date: _____

Signature: _____

Name: _____
(Please Print)

Title: _____