

SUPPLIER CODE OF CONDUCT

November 1, 2023

Integrity Guide for Suppliers, Contractors, and Consultants of DermTech

Purpose:

At DermTech, Our mission is to improve the lives of millions by providing non-invasive precision dermatology solutions that enable individualized care.

We are dedicated to making a positive impact on humanity, not just through our technology, but through our actions to bring a more sustainable and equitable future. For this reason, DermTech is committed to working with suppliers and partners who share our sense of corporate social responsibility and who strive to be good corporate citizens.

Preface:

Integrity and fairness are central to how we operate both in the workplace and the marketplace. To achieve our mission, we consider it business-critical to work with suppliers who share our commitment to integrity and who support an ethical and compliant culture.

We hold our suppliers to the same high standards of business conduct and social and environmental responsibility. DermTech complies with all local workplace regulations and is committed to treating all stakeholders with respect and dignity.

We expect our suppliers to:

- Comply with Local Regulations
- Uphold Human Rights
- Ensure a Safe and Healthy Workplace
- Demonstrate Social and Environmental Responsibility
- Conduct Business in an Ethical Manner

This Supplier Code of Conduct has been developed to incorporate the principles of the DERMTECH CORPORATE CODE OF CONDUCT AND ETHICS AND WHISTLEBLOWER POLICY which details the ethical framework for how we manage our business and governs the work we do each day. The same fundamental elements outlined in our DermTech Code of Conduct are expected to be supported and promoted by our suppliers, contractors, consultants, and business partners. We will not knowingly do business with suppliers who violate these expectations.

DermTech suppliers are expected to understand and comply with the DermTech Supplier Code of Conduct and DermTech reserves the right to verify the supplier's compliance with it at any time. This Supplier Code of Conduct is not intended to conflict with or modify the terms and conditions of any existing contract or agreement. In the event of such a conflict, suppliers must first adhere to applicable laws and regulations, then the contract terms, followed by this Code.

Contents:

- Governance & Ethics
- People
- Environment, Health, Safety & Sustainability

GOVERNANCE & ETHICS

Ethics and Legal Compliance:

DermTech is committed to conducting its business honestly, with integrity, within ethical standards, and compliance with all applicable laws and regulations.

- DermTech bases its supplier relationships on lawful and fair practices.
- Suppliers shall conduct their business competitively, with integrity and ethics.
- Suppliers must follow applicable laws, regulations, legal requirements, other contractual obligations and uphold the fundamental elements of human rights.
- Suppliers are responsible for ensuring that they and their employees, independent contractors, representatives, downstream suppliers, and subcontractors comply with the standards of behavior in this document and adhere to similar environmental and social responsibility principles as outlined in the DermTech Code of Conduct and the Supplier Code of Conduct.

Anti-Corruption and Anti-Bribery:

DermTech forbids bribery and corruption in the conduct of its business. It is DermTech's policy to comply with all applicable anti-bribery and anti-corruption laws, including but not limited to the U.S. Foreign Corrupt Practices Act, the U.K. Bribery Act, and the China Anti-Unfair Competition Law. This includes laws that prohibit bribery of government officials and employees.

- Suppliers are required to comply with anti-corruption and anti-bribery laws of every country in which they conduct business.
- Suppliers are prohibited from offering, requesting, agreeing to receive, or accepting a bribe, kickback, payment for advertising, gifts disguised as allowances or expenses, or any other improper financial or other advantage to government officials, health care professionals, or anyone else. This includes anything of value, including cash, gifts, entertainment, offers of employment, or participation in a contest game or promotion to any DermTech employee, representative, DermTech customer or to any government official.
- Facilitation payments, regardless of whether permitted by local law, are also prohibited.
- Suppliers are prohibited from activities that directly or indirectly offer, promise, pay, give, or authorize the giving of any financial or other advantage, or anything of value, to any other person or organization, in order to exert improper influence over the recipient, induce the recipient to violate his or her duties, secure an improper advantage for the Company, or improperly reward the recipient for past conduct.
- Suppliers will maintain and enforce a policy requiring adherence to lawful business practices, including a prohibition against bribery and extortion of government officials.
- Suppliers are required to maintain books and records that accurately and fairly reflect transactions in reasonable detail and that internal controls are maintained to prevent and detect potential violations of policy or applicable law. No false or misleading entries may be made in the books and records for any reason, and all payments and transactions, regardless of value, must be recorded accurately.

Conflict of Interest

DermTech expects suppliers to be free from influences that conflict with DermTech's best interests. Suppliers must disclose any actual or potential conflicts of interest prior to entering into any business relationship with DermTech. Suppliers must promptly notify DermTech of any potential conflict of interest that may arise during our contractual period so that DermTech may manage the actual or potential conflict to ensure that the best interests of DermTech is not compromised in the course of the supplier relationship.

Compliance Reporting:

DermTech is committed to the highest possible standards of ethical, moral, and legal business conduct. To help facilitate the reporting of good faith concerns regarding, among other things, legal and ethical issues, accounting and finance, discriminatory employment practices, harassment and/or misconduct, substance abuse concerns, breach of confidentiality, environmental health & safety issues, anti-bribery and regulatory violations, DermTech has established a third-party compliance hotline and website that DermTech employees and others may use. Suppliers are expected to report violations or possible violations to DermTech's Whistleblower Compliance Hotline at 844-811-7120 or via the link: [Compliance Hotline Internet Access](#).

Human Rights:

DermTech is committed to respecting human rights and to treating every stakeholder with respect. We expect DermTech suppliers to similarly treat all stakeholders with respect and dignity.

We aim to uphold and advance fundamental principles contained in the International Bill of Rights (i.e., United Nations Universal Declaration of Human Rights, International Covenant on Civil and Political Rights, and International Covenant on Economic, Social, and Cultural Rights), the International Labor Organization's Declaration on Fundamental Principles and Rights at Work, and the United Nations Guiding Principles on Business and Human Rights. DermTech suppliers are expected to uphold international human rights and labor standards in conformance with these fundamental principles and internationally recognized standards.

Key Commitments of the DermTech Human Rights Policy include:

- Ethical Business Conduct;
 - Supplier Code of Conduct;
 - Right to Exercise Freedom of Association;
 - Fair Wages and Working Hours;
 - Protection of Privacy; Safe Workplace;
 - Elimination of Child and Forced Labor;
 - Equal Opportunity.
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- Suppliers shall ensure respect for human rights in throughout their operations (including but not limited to the operations of their own suppliers and any permitted subcontractors) in accordance with the [UN Guiding Principles on Business and Human Rights](#) (the "UN Guiding Principles").
 - Suppliers shall respect human rights of their employees and others in their business operations and with their activities with DermTech.

Competition Law:

- Suppliers shall never share or exchange any price, cost or other competitive information or engage in any collusive conduct with any third party with respect to any proposed, pending or current DermTech product and or procurement.
- Suppliers are expected to conduct business in compliance with antitrust and fair competition laws where they operate.

Security and Privacy:

- Suppliers providing software or IT services will be required to complete a standard third-party security and privacy risk assessment to properly analyze the risk posed to DermTech by the vendor. Depending on the risk profile of the vendor, this assessment will be performed regularly (e.g., annual, biannual, triannual) during the vendor's relationship with DermTech.
- Suppliers are expected to protect DermTech confidential and proprietary information. Any information or data regarding DermTech operations shall always be treated as strictly confidential unless that information is in the public domain.
- Suppliers shall implement and maintain physical, organizational, and technical measures to ensure the security and confidentiality of DermTech Data to prevent accidental, unauthorized or unlawful destruction, alteration, modification or loss of DermTech Data, misuse of DermTech Data, or unlawful processing of DermTech Data.
- Suppliers will protect their operations and facilities against exploitation by criminal or terrorist individuals and organizations.
- Suppliers shall comply with applicable security and privacy laws and regulations as well as data retention requirements in all situations when conducting business with DermTech.
- Suppliers must ensure that, at all times, they have appropriate technical and security measures in place to protect DermTech's confidential information from unauthorized disclosure. Suppliers may not outsource, disclose, share, or use this information with anyone, or for any purpose, outside the terms of their agreement(s) with DermTech.
- The DermTech logo must not be used without written approval.

Intellectual Property:

- Suppliers shall honor the intellectual and other property rights of DermTech and of third parties, including all patents, trade secrets, trademarks and copyrights.
- Any use, disclosure and handling of DermTech's intellectual property must be in accordance with any applicable agreements.

Trade Controls and Customs Matters:

Suppliers will not transfer DermTech technical information to any third party without the prior express, written consent of DermTech, and will comply with all applicable trade control laws and regulations in the import, export, re-export or transfer of goods, services, software, technology or technical data including any restrictions on access or use by unauthorized persons or entities.

Controllership:

Suppliers will ensure that all invoices and any customs or similar documentation submitted to DermTech or governmental authorities or audited by third parties about transactions involving DermTech accurately describe the goods and services provided or delivered and the price thereof and ensure that all documents, communications, and accounting are accurate and honest.

Supplier Diversity:

DermTech is committed to diversity, inclusion, and fairness in all we do. Our commitment extends beyond our workforce and into our supply chain and communities through the DermTech Supplier Diversity Program. DermTech expects suppliers to support this commitment with programs to increase sourcing opportunities for small and diverse business where applicable.

PEOPLE

DermTech suppliers are expected to treat their employees with respect and dignity.

Elimination of Child Labor, Forced Labor, and Human Trafficking:

DermTech condemns all forms of exploitation of children and supports the elimination of exploitive child labor. DermTech supports the elimination of all forms of forced, bonded, indentured, involuntary prison labor, and human trafficking. DermTech will never knowingly use a supplier, contractor, channel partner, business partner, etc. engaged in child, forced, or slave labor nor will we condone such practices.

- Suppliers will not use forced, involuntary prison or indentured labor, or workers subject to any form of physical, sexual or psychological compulsion, exploitation or coercion, or engage in or abet trafficking in persons.
- Suppliers shall comply with all applicable labor laws, rules, and regulations, including but not limited to, all laws forbidding the solicitation, facilitation, or any other use of slavery or human trafficking.
- Suppliers shall not use child labor. The employment of young workers below the age of 18 shall only occur in non-hazardous work and when young workers are above the country's legal age for employment.

Fair Employment, Equal Opportunity, Non-Discrimination and Freedom of Association:

DermTech supports the elimination of discriminatory practices with respect to employment. We are committed to fair and respectful treatment. We are committed to and promote equal opportunity and diversity in the workplace and in all aspects of our business operation. We expect our suppliers to provide employment and advancement opportunities to individuals based on merit and not tolerate acts of discrimination.

- Suppliers will observe applicable laws and regulations governing wages and hours and employment contracts recruitment.
- Suppliers will not tolerate discrimination, harassment, retaliation, and discrimination.
- Harassment or discrimination for reasons based on race, color, age, gender, sexual orientation, marital status, gender identity and expression, ethnicity, religion, physical or mental disability, medical condition, genetic information, veteran status, national origin, political affiliation, union membership, or any protected class is not tolerated.
- Suppliers will provide fair and respectful treatment and equal opportunity. They will provide fair wages, benefits, and working hour schedules that comply with applicable laws and collective agreements.
- Suppliers must practice ethical recruitment and hiring practices compliant with provisions of the law and this policy.
- Suppliers will allow workers to choose freely whether to organize or join associations of their own choosing for collective bargaining as provided by local law or regulation.

ENVIRONMENT, HEALTH, SAFETY & SUSTAINABILITY

Health and Safety:

DermTech is committed to a safe and healthy work environment for all our employees, contractors and the communities where we operate. We expect our suppliers to provide a safe and healthy work environment.

- Suppliers will comply with applicable health and safety laws and regulations.
- Suppliers will provide a safe and healthy working environment.
- Suppliers will provide a work environment free from violence and harassment of any kind that threatens, intimidates, or coerces another person.
- Suppliers shall make available safety information related to hazardous materials in the workplace and train employees on protection from hazards.
- Suppliers shall implement emergency response plans and procedures.
- Suppliers shall reference and comply with DermTech's Environment Health & Safety Policy

Environment:

As a global corporate citizen, DermTech recognizes the importance of the environment to a healthy, sustainable future for our business, our patients, and communities. We are committed to safeguarding earth's resources and to continuously strengthening our environmental stewardship through our facilities, our products, and supply chain.

- Suppliers will comply with applicable environmental laws and regulations.
- Suppliers shall operate in an environmentally responsible and efficient way to minimize impact on the environment.
- Suppliers shall commit to reducing their environmental footprint.
- Suppliers will, upon request, provide DermTech with information on sustainability performance.
- Suppliers shall reference and comply with DermTech's Environment Health & Safety Policy.

Sustainability

- Suppliers are expected to commit to establishing and monitoring goals associated with the reduction of their environmental footprint.
- Suppliers should conserve natural resources by reducing energy, water, and waste.