



CASTLE BIOSCIENCES, INC.
VENDOR CODE OF CONDUCT

Effective Date: January 24, 2023

INTRODUCTION

At Castle, it is our mission to improve health through innovative tests that guide patient care. Our vision is to transform disease management by keeping people first: patients, clinicians, employees and investors. Since our inception, we have remained focused on this mission and vision.

In fulfillment of our mission and vision, we trust and expect that our vendors, including those who supply products and services in our offices and in our laboratory facilities, and contractors who conduct clinical studies on behalf of Castle, will honor these same values and commitments.

We expect our vendors to hold themselves to high ethical standards, and to that effect, have developed this Vendor Code of Conduct (“Code”) that outlines Castle’s expectations regarding responsible conduct from our vendors.

For the purposes of this Code, a “vendor” is any third party wherever located that directly or indirectly sells, or seeks to sell, any kind of goods or services to Castle Biosciences, Inc. or any of our subsidiaries. This Code 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, vendors must first adhere to applicable laws and regulations, then the contract terms, followed by this Code.

VENDOR EXPECTATIONS

Vendors are responsible for ensuring that their employees, representatives, suppliers, subcontractors, and other business partners understand, and comply with, the requirements set forth in this Code. Vendors must also comply with all laws and regulations applicable to their business when conducting business on our behalf. We expect vendors to self-monitor regarding these practices and promptly notify Castle of any known or suspected violation of this Code. In addition, suppliers performing work under U.S. Government contractors (whether direct or indirect) must comply with applicable federal acquisition regulations.

ETHICAL BUSINESS PRACTICES

Ethics



Castle is committed to conducting its business in accordance with the highest ethical standards and in compliance with applicable laws, rules and regulations. We expect our vendors to share our values and uphold our standards. We also expect our vendors to develop policies and programs as appropriate to ensure that all workers understand and adhere to these standards, as well as those set forth in our Code of Business Conduct and Ethics, and encourage our vendors to flow down these standards to the entities that furnish goods and services to our vendors.

Anti-Bribery, Anti-Corruption and Unfair Business Practices

We have a zero-tolerance policy for corruption and prohibit anyone conducting business on our behalf from offering or making any improper payments or anything of value to government officials, political parties, candidates for public office, or other individual, entity, or organization for the purpose of exerting improper influence or to obtain or retain an improper benefit or advantage in relation to Castle's business. Vendors are expected to comply with all applicable laws prohibiting bribery, corruption and money laundering, including the Foreign Corrupt Practices Act, U.S. embargoes, U.S. export controls, and antiboycott regulations. Vendors must comply with all antitrust and fair competition laws and regulations.

Conflict of Interest

We expect vendors to be free from influences that conflict with the best interests of Castle. Vendors must disclose any actual or potential conflicts of interest prior to entering any business relationship with Castle and promptly notify Castle of any potential conflict of interest that may arise during our contract period in order to ensure that any actual or potential conflicts can be managed to ensure that the best interests of Castle are not compromised in the course of the vendor relationship.

Information Security and Data Privacy

Vendors must protect all confidential, proprietary and personal information entrusted to them and information generated or developed by them in support of our business from unauthorized access, destruction, use, modification or disclosure. Vendors must comply with all applicable contractual and legal requirements and industry best practices regarding cybersecurity, data privacy and information when confidential, proprietary or personal information is collected, stored, processed, transmitted, and shared. Castle expects its vendors to maintain a comprehensive information security program, policies and practices to protect facilities, systems, networks and data.

Vendors are required to protect Castle's intellectual property, including trademarks, patents, copyrights, business methodologies, and trade secrets. Vendors may not use any of Castle's intellectual property or confidential information except as provided in the vendor's contract. Vendors have a duty to keep proprietary information strictly confidential and protected from disclosure.

Anti-discrimination and Anti-harassment



Vendors must ensure a workplace that is free of discrimination and harassment and must prohibit threats or abuse. We expect vendors to comply with all applicable anti-harassment laws and ensure that employees may perform their work in an environment free from physical, psychological, sexual and verbal harassment, or other abusive conduct. Vendors must comply with all applicable laws regarding discrimination in hiring and employment practices and provide equal employment opportunity to employees and applicants for employment and not engage in discriminatory employment practices on the basis of any characteristics protected under applicable law, including race, ethnicity, ancestry, color, religion, sex, pregnancy, sexual orientation, gender identity or expression, age, marital status, family structure, genetic information, national origin or their status as protected veterans or individuals with disabilities, or any other characteristic protected by federal, state or local law.

Product Quality

Vendors must meet certain established minimum quality requirements as mutually agreed upon with Castle. Vendors are also expected to establish controls with their supply base to ensure quality requirements are met. For our laboratory facility, we procure reagents, equipment, chips/cards and other materials used to perform our tests. We value the quality of the product and ingredients above all in selecting vendors who supply these products. We procure large lab equipment from only reputable manufacturers and test the equipment functionality and specifications to determine the best option. Castle's Chemical Reagent QC Policy provides guidelines regarding quality control (QC) of chemicals procurement.

Clinical Studies

We expect vendors and contractors who conduct clinical studies on behalf of Castle to follow all designated regulatory requirements in accordance with Good Clinical Practices standards.

Financial Responsibility / Accurate Records

Vendors must create and maintain complete and accurate business records. All records, regardless of format, made or received in furtherance of a business transaction must fully and accurately represent the transaction or event being documented.

Drug-Free Workplace

We expect our vendors to maintain a workplace free from the use, possession, sale or distribution of illegal substances.

LABOR PRACTICES

We expect our vendors to conduct business in a manner consistent with applicable employment and human rights laws and regulations where they have operations.



- *Child Labor:* Vendors will not engage in the unlawful employment or exploitation of children in any part of their supply chain.
- *Human Trafficking and Modern Slavery:* We expect our suppliers to abide by all applicable anti-human trafficking and modern slavery laws and to not engage in the use of forced labor, bonded or indentured labor, involuntary prison labor, slavery or trafficking of persons, and vendors must take affirmative steps to prevent such acts from occurring in their own operations and their own supply chain.
- *Freedom of Association:* In conformance with applicable law, vendors shall respect the right of all workers to form and join, or refrain from joining, trade unions or other worker organizations of their own choosing, to bargain collectively, and to engage in peaceful assembly as well as respect the right of workers to refrain from such activities.
- *Working Hours and Wages:* Vendors must provide fair and equitable compensation, wages, benefits, and other working conditions of employment. We also expect our vendors to follow applicable wage and hour laws and regulations.

HEALTH AND SAFETY

Vendors must ensure that the health, safety, and wellbeing of employees or partners is maintained, particularly in a laboratory facility. Vendors are responsible for maintaining environmental health and safety policies and procedures, and for complying with all applicable laws and regulations to ensure a safe and healthy workplace.

ENVIRONMENTAL COMPLIANCE

It is our policy to conduct our business in an environmentally responsible way that minimizes environmental impacts. We expect our vendors to minimize and, if practical, eliminate the use of any substance or material that may cause environmental damage, reduce waste generation and dispose of all waste through safe and responsible methods, minimize environmental risks by employing safe technologies and operating procedures, and be prepared to respond appropriately to accidents and emergencies. All vendors must comply with applicable environmental laws, regulations and directives. Whenever possible, suppliers are encouraged to measure and share their greenhouse gas emissions publicly and demonstrate programs that reduce energy, waste, and water usage in their operations.

REPORTING AND NON-RETALIATION

We expect our vendors to provide their employees with avenues for raising legal or ethical issues or reporting concerns without fear of retaliation, commensurate with the size and nature of their business. We also expect our vendors to take action to prevent, detect, and address any retaliatory actions.

Questions



If you have questions about this Code as it relates to a business practice or compliance concern, please contact Castle’s Chief Operating Officer. Castle will not tolerate any retaliation taken against any individual who has in good faith sought advice, assisted in an investigation or reported misconduct, questionable behavior or a possible violation of law or Castle policy in accordance with our Open Door Policy.

Oversight

The Audit Committee of our Board of Directors is responsible for the oversight of the effectiveness of our environmental, social and governance (ESG) risk management, strategy, initiatives and policies. Castle’s Internal Management Committee is comprised of a cross-functional set of representatives, including leaders from Marketing, Finance, Human Resources and Operations, and meets periodically to advance and operationalize ESG matters, ensuring progress, accurate internal reporting and timely data gathering is made across the Company.