



23ANDME HOLDING CO.

SUPPLIER CODE OF CONDUCT

Effective December 9, 2022

23andMe, Inc. (including its affiliates, “**23andMe**”) treats all workers with respect, ensures safe working conditions, and conducts environmentally responsible and ethical operations. We require suppliers in our operations and supply chain, including their subsidiaries, affiliates, subcontractors, and sub-suppliers (collectively, “Suppliers”), to comply with the following ethical and environmental standards.

General Compliance with All Laws

Suppliers shall respect and operate in full compliance with the laws of their respective countries and with all other applicable laws, rules, and regulations, including those relating to labor, worker health and safety and the environment. In all instances, the international labor standards, national and/or local law that affords the highest level of protection to workers shall apply.

Suppliers shall stay current on all laws, rules and regulations applicable to the products and services supplied to 23andMe and shall ensure that they meet the most current applicable legal requirements regardless of whether they are referenced herein.

Compliance with 23andMe’s Supplier Code of Conduct (“Code”); Reporting of any Actual or Possible Violation of this Code

This Code applies to 23andMe Suppliers (1) conducting business with or on behalf of 23andMe, or (2) providing goods and/or services to 23andMe.

Suppliers must acknowledge and implement the Code in their operations and across their supply chains. Suppliers must promptly inform 23andMe at legal@23andme.com when Supplier becomes aware of any situation that causes, or may cause, the Supplier to violate this Code.

Suppliers must conduct their employment practices in full compliance with all applicable laws and regulations and in compliance with 23andMe’s standard and requirements, which may exceed local legal requirements. When differences arise between 23andMe’s standards and the applicable legal requirements, the stricter standard shall apply, in compliance with applicable law.

While Suppliers are expected to self-monitor and demonstrate their compliance with the Code, 23andMe may audit Suppliers or inspect Suppliers’ facilities to confirm compliance.

If 23andMe determines at any time that any Supplier has violated this Code, 23andMe may, at its sole discretion, terminate its business relationship and/or require Supplier to implement a corrective action plan. If corrective action is not taken, 23andMe may suspend the placement of future orders and may terminate current production. 23andMe strongly encourages its Suppliers to define and implement a policy for social accountability and to establish a system to ensure that the requirements of this Code are consistently met.

Human Rights and Fair Labor Practices

23andMe requires that Suppliers comply with all applicable labor and employment laws. 23andMe requires suppliers to establish a fair and ethical workplace, free of harassment and discrimination, for all workers. Workers shall be treated with dignity and respect. Further, 23andMe favors suppliers who progressively raise worker living standards through improved wage systems, benefits, welfare programs and other services, which exceed legal requirements and enhance quality of life. Every worker has a right to compensation for a regular work week that is sufficient to meet the worker's and their family's basic needs and to provide some discretionary income.

Discrimination: Suppliers shall provide a workplace free of discrimination. No person shall be subject to any discrimination in any aspect of the employment relationship including, without limitation, discrimination: (1) resulting from and/or during recruitment, hiring, compensation, benefits, work assignments, access to training, advancement, discipline, termination or retirement; or (2) on the basis of race, religious belief, color, gender, pregnancy, childbirth or related medical conditions, age, national origin, ancestry, sexual orientation, gender identification, physical or mental disability, medical condition, illness, genetic characteristics, family care, marital status, status as a veteran or qualified disabled veteran (in the USA only), caste, socio-economic situation, political opinion, union affiliation, ethnic group, body art, or any other classification protected under applicable law. 23andMe embraces diversity and equal opportunity as fundamental principles and key components of its corporate strategy, and expects that all Suppliers do the same. All employment decisions must be made based on the principle of equal employment opportunity, and shall include effective mechanisms to protect migrant, temporary and/or seasonal workers against any form of discrimination. International Labor Organization (ILO) Conventions 100 and 111 contributed to these requirements.

Anti-Harassment and Abuse: Suppliers shall commit to a workplace free of harassment and abuse. Suppliers shall not threaten workers with, or subject them to harsh or inhumane treatment, including but not limited to verbal abuse and harassment, psychological harassment, mental and physical coercion, and/or sexual harassment. Supplier shall ensure no worker shall be subject to monetary fines or embarrassing acts as a disciplinary measure.

Voluntary Employment and Combatting Modern Slavery: Suppliers shall ensure that all work is voluntary and shall comply with all applicable anti-slavery and human trafficking laws, statutes, and regulations from time to time in force in any part of their supply chain, including the UK Modern Slavery Act 2015, as applicable. Suppliers shall not traffic persons or use any form of slave, forced, bonded, indentured, and/or prison labor. Involuntary labor includes the transportation, harboring, recruitment, transfer, receipt, and/or employment of persons by means of threat, force, coercion, abduction, fraud, and/or payments to any person having control over another person for the purpose of exploitation.

Suppliers shall not withhold workers' original government-issued identification and travel documents. Suppliers are prohibited from destroying, concealing, confiscating, or otherwise restricting or denying workers' access to employee identity or immigration papers.

Suppliers shall ensure that workers' contracts clearly convey the conditions of employment in a language understood by the workers. Suppliers must prohibit the use of misleading and/or fraudulent practices during the recruitment and employment process. Suppliers must disclose, in a format and language accessible to the worker, basic information regarding the key terms and conditions of employment, including wages and fringe benefits, the location of work, living conditions, housing and associated costs (if any), any other costs to be charged to the worker, and any hazards involved in the work. Such disclosures must be made before the worker enters employment and as needed throughout their term of employment.

Suppliers shall not impose unreasonable restrictions on movement within the workplace or upon entering or exiting company-provided facilities. Workers shall not be required to pay employers' or their agents' recruitment fees or other similar fees to obtain their employment. If such fees are found to have been paid by workers, such fees shall be repaid to the worker. Workers must be free to resign their employment in accordance with Suppliers' local and national laws or regulations without unlawful penalty.

Suppliers are required to monitor any third party entity which assists them in recruiting and/or hiring employees, to ensure that people seeking employment at their facility are not compelled to work through force, deception, intimidation, coercion and/or as a punishment for holding or expressing political views according to the ILO Conventions 29, 105, 182.

Underage Labor: Suppliers shall employ only workers who are at least: (1) 15 years of age, (2) the applicable minimum legal age for employment, or (3) the applicable minimum age for completion of compulsory education, whichever is highest. Suppliers may provide legitimate workplace apprenticeship programs for educational benefit that are consistent with Article 6 of ILO Minimum Age Convention No. 138 or light work consistent with Article 7 of ILO Minimum Age Convention No. 138. Suppliers are required to have a remediation plan in place to ensure that, in the event of any child labor found, the specific individuals and/or entities which pushed the child into work are tackled and the risk that they push the child back to work is reduced. Suppliers must follow international standards, Suppliers' local legal requirements, and 23andMe's child labor remediation requirements.

Juvenile Worker Protections: Suppliers may employ juveniles who are older than the applicable legal minimum age but are younger than 18 years of age, provided they do not perform work that might jeopardize their health, safety, or morals, consistent with ILO Minimum Age Convention No. 138. Suppliers shall not require juvenile workers to work overtime or perform nighttime work.

Wages and Benefits: Suppliers shall pay at least the minimum wage and provide any benefits required by law and/or contract. Suppliers shall communicate pay structure and pay periods to all workers. Suppliers shall meet all legal requirements relating to wages and benefits, pay accurate wages in a timely manner, and wage deductions shall not be used as a disciplinary measure. All use of temporary and outsourced labor shall fully comply with (and be within the limits of) all applicable laws and regulations.

Humane Treatment and Disciplinary Action:

Suppliers shall always treat workers in a fair manner and with dignity and respect. Suppliers shall not engage in or permit the use of corporal punishment, threats of violence, sexual harassment, verbal abuse, or any other form of physical or psychological coercion.

Grievance Mechanisms: Suppliers must provide grievance mechanisms that are transparent, responsive, anonymous, unbiased and confidential to workers and other parties across the value/supply chain. Suppliers must communicate to workers the existence of such grievance mechanisms and provide access that allows for anonymous reporting. Reported concerns and violations will be addressed in a timely manner and follow a clearly outlined process. Suppliers must notify 23andMe if any concerns or violations are reported through the grievance mechanism that are in direct violation of the Code.

Non-Retaliation: Suppliers are strictly prohibited from retaliating against any individual who in good faith reports or provides information about concerns or suspected violations. Retaliation means any adverse action taken because an individual has made a report or has participated in an investigation. An adverse action means any action that materially affects an individual's standing or terms and conditions of employment.

Community: 23andMe encourages all Suppliers and their personnel to get involved in local social and environmental community charity efforts by volunteering time and/or providing other types of support.

Freedom of Association: Suppliers shall not penalize, restrict, threaten, or interfere with workers' lawful efforts to join associations of their choosing or to bargain collectively. Where the right to freedom of association and collective bargaining is restricted or prohibited under law, employees must at least be permitted and enabled, by way of an alternative, freely and independently, to associate for bargaining purposes.

Working Hours:

Suppliers shall set working hours in full compliance with all applicable laws and regulations. Except in extraordinary business circumstances, workers shall not be permitted to work more than 48 hours during a regular week, plus overtime hours not in excess of 12 hours per week. Suppliers shall, in any event, ensure that workers have at least one day off in every seven-day period, and further, that workers have the right to refuse overtime without any threat of penalty, punishment or dismissal.

Health and Safety

Suppliers shall provide a safe and healthy workplace to prevent accidents and injury to health arising out of, linked with, and/or occurring during the course of work, or as a result of the operation of employers' facilities. The employer shall take a proactive approach to health and safety by implementing policies, systems and training designed to prevent accidents and injuries and to protect worker health consistent with ILO Convention 155. Workers shall have the right to refuse unsafe work and to report unhealthy working conditions.

Permits: Suppliers shall obtain, keep current, and comply with all required health and safety permits.

Occupational Health and Safety Management: Suppliers shall identify, evaluate, and manage occupational health and safety hazards through a prioritized process of hazard elimination, substitution, engineering controls, administrative controls, and/or personal protective equipment.

Health and Safety Communication: Suppliers shall provide workers with appropriate workplace health and safety training in their primary language. Health and safety related information shall be clearly posted in the facility.

Environment

23andMe is committed to protecting the environment. We expect Suppliers to share our commitment by responding to challenges posed by climate change and working toward protecting the environment. Suppliers shall maintain written environmental policies and standards and must comply with all applicable environmental laws.

Responsible Sourcing of Materials: Suppliers shall exercise due diligence on relevant materials in their supply chains. Suppliers shall develop particular due diligence policies and management systems in order to identify applicable risks and take appropriate steps to mitigate them. Due diligence shall be conducted at the material processing level in order to determine whether relevant materials originate from regions with high risks, which include areas associated with conflict, worst forms of child labor, forced labor and human trafficking, gross human rights violations such as widespread sexual violence, and/or other reasonably objective high risk activities, including severe health and safety risks and negative environmental impacts.

Ethics

Suppliers shall be ethical in every aspect of its business, including relationships, practices, sourcing, and operations.

Business Records: Suppliers shall honestly and accurately record and report all business information and comply with all applicable laws regarding their completion and accuracy. Suppliers must create, retain, and dispose of business records in full compliance with all applicable legal and regulatory requirements.

Communication: Suppliers shall be honest, direct, and truthful in discussions, including those with regulatory agency representatives and government officials.

Press/Publicity: Suppliers will only speak to the press about 23andMe or matters pertaining to Supplier's relationship with 23andMe if referencing 23andMe by name if expressly authorized in writing to do so by 23andMe. Supplier further shall not reference 23andMe as a customer of Supplier without the express written authorization of 23andMe.

No Bribery: Suppliers shall never offer or accept bribes, kickbacks, inappropriate gifts or hospitality, or other improper incentives in connection with 23andMe business. Suppliers shall not make illegal payments directly or indirectly. It is Suppliers' responsibility to implement surveillance and enforcement procedures and conduct training of its employees, agents and any other personnel working on behalf of Supplier, to ensure compliance with anti-corruption laws. Any business courtesies shall not exceed moderate value.

No Conflict of Interest: Suppliers shall avoid any conflict of interest relating to financial interests or other arrangements with 23andMe employees, officers, directors, consultants or any other personnel that may be considered inappropriate. If Suppliers are aware of any family, friend or other close personal relationships with 23andMe employees, officers, directors, consultants or other personnel, who may directly or indirectly impact

their engagements with 23andMe, they should immediately disclose such relationships and 23andMe will determine, in its sole discretion, how to proceed with the engagements.

Diversity, Equity and Inclusion (DEI)

Suppliers fully acknowledge 23andMe's mission to empower and provide equal access to opportunity for all employees, communities, and customers. Suppliers should be committed to participating in 23andMe-led DEI initiatives such as completion of 23andMe's annual DEI survey and driving continuous improvements in DEI best practices.

Management System

Suppliers shall adopt or establish a management system to carry out these responsibilities. The management system shall be designed to ensure: (a) compliance with applicable laws, rules and regulations; (b) compliance with this Code; and (c) identification and mitigation of operational risks related to this Code.

Suppliers may determine and design their own management system and are highly encouraged to include the following components that have proven to manifest an effective and efficient management system:

- company commitment
- executive engagement and accountability
- dedicated resources to identify, monitor and comprehend the applicable law, rules and regulations, as well as this Code
- processes and resources to conduct risk assessments and implement risk mitigation measures
- corrective action processes
- training programs and communication at different working levels to enforce awareness and compliance
- a process and/or system that allows for anonymous reporting unless prohibited by law
- a well-established and well-maintained documentation system that keeps up the latest laws and regulatory requirements
- periodical audits and assessment