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Supplier Code of Conduct

1 PURPOSE AND VISION

NeoGenomics Laboratories, Inc., its subsidiaries, and affiliated entities ("NeoGenomics") have a core purpose centered on advancing precision medicine and personalized cancer care.

- **Partnership:** NeoGenomics partners with physicians to deliver actionable insights that guide treatment decisions and improve patient outcomes.
- **Comprehensive Care:** NeoGenomics achieves this through a comprehensive oncology portfolio, integrated customer solutions, and an unwavering commitment to excellence.

NeoGenomics' vision reflects the realities of modern oncology, emphasizing that every patient's genetic profile and cancer journey are entirely unique. It drives the company to develop advanced testing solutions—ranging from comprehensive genomic profiling (CGP) to minimal residual disease (MRD) monitoring—to ensure treatment can be tailored to the individual rather than a one-size-fits-all approach.

2 ETHICS AND INTEGRITY EXPECTED FROM SUPPLIERS

This Supplier Code of Conduct ("Code")¹ establishes baseline expectations applicable to Suppliers. Simply put, as a condition of doing business with us, we require our suppliers to comply with all applicable laws, rules, and regulations in the jurisdictions where they operate and in connection with the products and services suppliers provide to NeoGenomics. We also expect our suppliers to maintain the highest standards of ethics and integrity in all business transactions and to be transparent and cooperative with regulators enforcing such laws, rules, and regulations. As a healthcare and diagnostic services organization that supports patient care, NeoGenomics maintains high standards relating to patient safety, privacy, data protection, quality, ethics, and regulatory compliance. We expect suppliers to uphold these standards in all activities performed for or on behalf of NeoGenomics.

NeoGenomics expects suppliers to operate in a manner consistent with the principles set forth in this Supplier Code of Conduct and may consider a supplier's alignment with these principles when establishing and maintaining business relationships.

Suppliers that act on behalf of the Company, including those interacting with customers, healthcare professionals, or government officials, are subject to enhanced requirements set forth in the Third-Party Intermediary Compliance Handbook, which supplements this Code.

3 BUSINESS PRACTICES

3.1 Anti-Bribery and Anti-Corruption

Suppliers must fully comply with requirements of all applicable bribery and anti-corruption laws, for example, the U.S. Foreign Corrupt Practices Act and the UK Bribery Act. While NeoGenomics observes local business customs and market practices, NeoGenomics nor any supplier shall participate in any corrupt, unethical, or illegal practices.

¹ The Code is not intended to create new and additional third-party rights, including for workers.

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3.2 Accuracy of Business Records

Suppliers must keep accurate, legible, and transparent records that reflect actual transactions and should not hide, fail to record, or misrepresent transactions.

Financial records should be maintained in accordance with applicable accounting standards and legal requirements, including Generally Accepted Accounting Principles (GAAP), International Financial Reporting Standards (IFRS), or other locally accepted accounting standards, as applicable.

Suppliers shall maintain sufficient records to demonstrate compliance with this Code and applicable laws. Upon reasonable notice, suppliers shall cooperate with NeoGenomics' requests for information, assessments, certifications, or audits relating to compliance with this Code.

3.3 Trade Compliance

Suppliers must comply with the letter and spirit of all applicable import and export controls, sanctions, and other trade compliance laws of the United States and the laws of the applicable geographies where supplier transactions occur.

3.4 Conflicts of Interest

Suppliers must disclose any apparent or actual conflicts of interest to NeoGenomics management. A conflict of interest arises when personal interests or activities influence, or appear to influence, the ability to act in the best interests of NeoGenomics. NeoGenomics reserves the right to take any necessary actions for failure to report conflicts of interest. Suppliers must document any decision of NeoGenomics management to waive a conflict of interest.

3.5 Gifts and Entertainment

Gifts and entertainment are not needed to conduct business with NeoGenomics and NeoGenomics discourages them. Other than as set forth below, suppliers must not offer or accept gifts or entertainment to or from NeoGenomics employees with intent of obtaining improper advantages or to influence the supplier. "NeoGenomics employees" includes, their family members, or people with whom NeoGenomics employees have close personal relationships. Modest gifts and hospitality are permissible so long as they are not provided as a *quid pro quo*, are modest in value, infrequent, unsolicited, given on a customary gift giving occasion, reasonable and customary in our business, comply with local laws, and permissible under the NeoGenomics Code of Conduct and the policies of the supplier. "Gifts" can include anything of value.

3.6 Interactions with Healthcare Providers

When engaged with healthcare providers ("HCP") (including healthcare professionals, healthcare organizations, patients, patient organizations, government officials, and payors) on behalf of NeoGenomics, suppliers must adhere to any industry standard of conduct that applies to them. Any benefit provided to a HCP on behalf of NeoGenomics must comply with all applicable legal and industry code requirements in the geographies in which the HCP resides and/or practices medicine. Payments or other benefits may never be used as a bribe, reward, inducement, or incentive for sales.

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3.7 Quality and Regulatory Compliance

Suppliers shall comply with all applicable quality, regulatory, and industry requirements relevant to the products or services they provide. As applicable, suppliers shall maintain processes and controls designed to support regulatory compliance, product quality, patient safety, and service reliability. Suppliers shall cooperate with NeoGenomics in connection with quality investigations, regulatory inquiries, corrective actions, recalls, or other compliance-related activities related to products or services provided to NeoGenomics.

3.8 Fair Competition and Antitrust

Suppliers must conduct their business in a fair and ethical manner and in compliance with all applicable fair competition and antitrust laws.

3.9 Confidential Assets, Information, and Intellectual Property

Suppliers must protect the confidential assets, information, and intellectual property of NeoGenomics and its clients. Suppliers must design and maintain processes to provide appropriate protections for such information. Suppliers requiring exchange of confidential information with NeoGenomics shall execute a confidentiality agreement with NeoGenomics before such disclosure. Exchange of confidential information is limited to such information required to fulfill contractual obligations between NeoGenomics and the supplier. Suppliers shall not share NeoGenomics' confidential information, or any other information acquired from NeoGenomics, including information developed by suppliers and information relating to products, customers, suppliers, pricing, costs, know-how, strategies, programs, processes, and practices of NeoGenomics. Suppliers must immediately report unauthorized disclosure of NeoGenomics confidential information, even if inadvertent.

3.10 Personal Information and Privacy

NeoGenomics requires suppliers to protect personal information in compliance with all applicable local privacy and security laws. Personal information provided by or on behalf of NeoGenomics should only be used, accessed, and disclosed as permitted by a supplier agreement.

Where a supplier creates, receives, maintains, transmits, or otherwise has access to Protected Health Information ("PHI") on behalf of NeoGenomics, the supplier may be required to execute a Business Associate Agreement ("BAA") and comply with applicable requirements of the Health Insurance Portability and Accountability Act ("HIPAA"), as amended, and other applicable healthcare privacy and security laws.

3.11 Information Security and Cybersecurity

Suppliers must implement and maintain administrative, technical, and physical safeguards designed to protect NeoGenomics data, confidential information, personal information, protected health information, and other information processed on behalf of NeoGenomics.

Such safeguards should be aligned with recognized industry standards and applicable legal requirements. Upon request, suppliers must provide reasonable evidence of their information security controls, including but not limited to SOC reports, ISO certifications, security assessments, or similar documentation.

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Suppliers shall promptly report any actual or suspected security incident involving NeoGenomics information and cooperate fully in any investigation and remediation activities.

Suppliers shall maintain incident response procedures and notify NeoGenomics without unreasonable delay following discovery of any actual or suspected breach involving NeoGenomics information.

3.12 Artificial Intelligence and Automated Systems

Suppliers may not use NeoGenomics confidential information, personal information, protected health information, deliverables, or any NeoGenomics data to train, validate, improve, or develop artificial intelligence, machine learning models, large language models, or other automated systems without NeoGenomics' prior written authorization. Suppliers must disclose any material use of AI or automated systems in connection with products or services provided to NeoGenomics.

4 HUMAN RIGHTS AND INCLUSION

NeoGenomics respects and expects all suppliers in its supply chain to respect, human rights, dignity and the privacy of individuals, in accordance with the United Nations Universal Declaration of Human Rights, national legislation supporting the Universal Declaration of Human Rights, the United Nations Guiding Principles on Business and Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work, and other relevant guidelines. In practical terms, this means that we require our suppliers to uphold the following standards.

4.1 Modern Slavery / Human Trafficking

NeoGenomics does not tolerate slavery, forced labor, or human trafficking in any form. This includes transporting, harboring, recruiting, transferring, or receiving persons by means of threat, force, coercion, abduction or fraud for labor or services. Suppliers must comply with the applicable legal requirements of slavery, forced labor, and human trafficking laws, for example the UK Modern Slavery Act 2015. Suppliers must enact practices, policies, and procedures to ensure compliance.

4.2 Child Labor

NeoGenomics does not tolerate child labor in any form. The term "child" refers to any person under the age of 15, or under the age for completing compulsory education, or under the minimum age for employment in the country, whichever is greatest. Suppliers must act in compliance with all laws regulating the minimum working age for each position, including any laws pertaining to the employment, apprenticeships, and internships of youths and students. Suppliers must enact practices, policies, and procedures to ensure compliance.

4.3 Conflict Minerals

NeoGenomics expects its suppliers to commit to processes designed to ensure the responsible sourcing of minerals and to reasonably ensure that the tantalum, tin, tungsten, and gold in the products they produce are conflict-free. Suppliers also must establish their own due diligence program to achieve conflict-free supply chains. If NeoGenomics determines a supplier is not conflict free, NeoGenomics will expect the supplier to remediate

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such matters or consider using alternative suppliers. Additionally, to monitor compliance, all suppliers who provide products or components to NeoGenomics containing conflict minerals must complete an annual survey and agree to cooperate with any due diligence that NeoGenomics chooses to perform with respect to country of origin inquiries, including providing reasonable proof of due diligence performed by the supplier to support country of origin.

4.4 Non-Discrimination and Workplace Diversity

Suppliers must comply with all applicable laws relating to discrimination in hiring, employment practices, and harassment, or retaliation. NeoGenomics expects suppliers to operate workplaces free of discrimination, harassment, victimization, and any other abuse on any grounds, including but not limited to, age, disability, ethnic or social origin, gender, gender identity, nationality, race, sexual orientation, marital status, parental status, pregnancy, political

convictions, religious beliefs, union affiliation, or veteran status. Workers shall be provided with reasonable accommodation for religious practices. In addition, workers or potential workers should not be subject to medical tests, including pregnancy or virginity tests, or physical exams that could be used in a discriminatory way.

4.5 Employment and Working Conditions

Suppliers must comply with all applicable employment laws and regulations, including local wage and labor laws such as maximum working hours, minimum wages, overtime hours and legally mandated benefits.

4.6 Freedom of Association

In conformance to local law, suppliers shall respect the right of all workers to form and join trade unions 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. Workers and/or their representatives shall be able to openly communicate and share ideas and concerns with management regarding working conditions and management practices without fear of discrimination, reprisal, intimidation, or harassment.

5 HEALTH AND SAFETY

5.1 Occupational Safety

Suppliers must comply with all applicable laws and regulations regarding health and safety. Suppliers working onsite at a NeoGenomics facility must work in a way that assures their own safety and the safety of others and in compliance with applicable NeoGenomics and governmental health and safety requirements. Suppliers must immediately report to NeoGenomics management any emergencies that may impact NeoGenomics.

5.2 Emergency Preparedness

Suppliers must implement emergency plans and response procedures that focus on minimizing harm to life, the environment, and property. This includes emergency reporting, employee notification and evacuation procedures, worker training, and drills.

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5.3 Environment

Suppliers must comply with all applicable environmental laws and regulations related to the development, manufacturing, and distribution of their products or services. Suppliers should strive to meet the highest standards of environmental responsibility. NeoGenomics suppliers should strive to continually improve their environmental footprint, including the promotion of sustainability initiatives such as energy and water conservation, pollution prevention, reduction of greenhouse gas emissions, waste minimization, and reuse recycling practices. NeoGenomics reserves the right to request greenhouse gas emissions data for the goods and services provided to NeoGenomics.

6 IMPLEMENTATION AND REPORTING VIOLATIONS

6.1 Supplier Assessment

Suppliers may be asked to re-affirm compliance with the Code periodically. Upon request, suppliers will also provide written information on their policies and practices related to compliance with the Code. NeoGenomics is committed to working with its suppliers to improve compliance with this Code.

Suppliers shall promptly provide information reasonably requested by NeoGenomics to support supplier qualification activities, risk assessments, compliance reviews, investigations, regulatory requirements, or customer-related due diligence requests.

6.2 Monitoring

Suppliers must have a program to conduct due diligence and monitor their own agents, sub-suppliers, and subcontractors who directly or indirectly provide products or services (or components thereof) to NeoGenomics, to help ensure that such agents, sub-suppliers, and subcontractors meet expectations consistent with those set out in this Code.

Suppliers are responsible for making reasonable efforts to ensure that subcontractors, agents, consultants, and sub-suppliers supporting products or services provided to NeoGenomics operate in a manner consistent with standards substantially similar to those set forth in this Code.

In the event the Company has knowledge of a concern in the upstream supply chain or involving an agent, suppliers must enable NeoGenomics to address such issues in accordance with the Company's legal obligations, as applicable.

6.3 Business Continuity

Suppliers must develop and implement appropriate business continuity plans for operations supporting NeoGenomics.

6.4 Risk Management

Suppliers must have mechanisms to determine and manage risks in all areas this Code addresses or unless otherwise stated.

6.5 Training and Competency

Suppliers must have a training program that achieves an appropriate level of knowledge, skills, and abilities in its management and workers to address the expectations of this Code.

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This training shall be provided to all workers prior to the beginning of work and regularly thereafter, and in the language of the worker or in a language the worker can understand.

6.6 Continual Improvement

NeoGenomics expects suppliers to continually improve by setting performance objectives, value add/value engineering, executing implementation plans, and taking necessary corrective actions for deficiencies identified by internal or external assessments, inspections, and management reviews.

6.7 Violations and Termination

If it appears that a supplier is not in compliance with the Code, we expect the supplier to cooperate and provide additional information for us to decide whether the supplier is compliant. If we determine that a supplier is not compliant, then remedies may include, but are not limited to, termination of business with NeoGenomics or the development and implementation of a corrective action plan that the supplier would need to implement within a certain fixed time unless the violation is severe or incurable, or there is a violation of law. NeoGenomics may follow such implementation with an audit, as it deems appropriate.

6.8 Reporting Violations

Individuals or entities should promptly notify NeoGenomics of any actual or suspected violations of this Code, or other issues relevant to this Code.

6.9 HOW TO REPORT

- The NeoGenomics manager responsible for the supplier relationship
- NeoGenomics' Integrity Hotline, which permits anonymous reports:
 - **U.S Toll-free: 877-662-2339**
 - **International or Web: www.neogenomics.ethicspoint.com**
 - NeoGenomics will take your questions or concerns seriously, and we will treat them confidentially to the greatest extent possible.

6.10 No Retaliation

NeoGenomics expects suppliers to have a policy and process for reporting workplace concerns, including reporting violations of this Code. The policy and process should be transparent and understandable and should protect reporting and participating individuals from retaliation. We will not tolerate retaliation against anyone who in good faith raises questions or concerns about a potential violation of the law or this Code, or who assists in an investigation of a reported violation.

6.11 Order of Precedence; Changes to the Code

The Code is not meant to—and does not—supersede any applicable law, or any term in an agreement between NeoGenomics and a supplier. To the extent there is any conflict between this Code and any applicable law or provision of any agreement, the applicable law or agreement controls.

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7 REVISION HISTORY

Revision	Change Description	Author	Effective Date
01	Initial Release	Jonathan Call	See Header