

## DOXIMITY, INC.

### ANTI-CORRUPTION POLICY & GUIDELINES

Doximity, Inc. and its subsidiaries and affiliates (collectively, “**Doximity**” or “**Company**”) are committed to promoting the highest standards of ethical business conduct and to conducting business in a way that complies with all applicable laws. This commitment is part of Doximity’s core values and helps build the trust that is a cornerstone of the Company’s success. As a global company, Doximity does business with people and companies around the world and must comply with all applicable laws, including the United States Foreign Corrupt Practices Act (“**FCPA**”) and similar anti-corruption laws of other nations that prohibit bribery and other corrupt actions (the “**Anti-Corruption Laws**”). All Doximity employees, officers, directors, contractors, and agents both within and outside the United States are required to comply with the Anti-Corruption Laws, this Anti-Corruption Policy & Guidelines (this “**Policy**”), and any procedures developed by management to implement this Policy.

This Policy is developed to educate relevant personnel of Doximity (both within and outside the United States) on Anti-Corruption Laws and to assist such personnel in meeting Doximity’s goal of complying with the letter and spirit of all applicable Anti-Corruption Laws.

Compliance with this Policy and all Anti-Corruption Laws is *mandatory*. Violations of this Policy may lead to disciplinary action, up to and including termination of employment.

#### 1. COMMITMENT

Doximity’s Board of Directors and executive officers are committed throughout the organization to carrying out business fairly, honestly, openly and in compliance with all Anti-Corruption Laws and this Policy. Each Doximity employee is expected to exhibit that same commitment by making sure that he or she knows the rules and this Policy and complies with them; asks questions when he or she has them; and helps build a culture of trust, integrity and honesty throughout the organization.

#### 2. CONTACT AND QUESTIONS

If at any time an Doximity employee has questions or concerns about this Policy or any conduct, the employee should contact Doximity’s Compliance Officer at the email address designated for that person. The Compliance Officer currently designated by the Chief Executive Officer and Chief Financial Officer is Doximity’s General Counsel.

#### 3. PROHIBITED CONDUCT

Doximity does not bribe. Not anywhere. Not anyone. Doximity expressly prohibits any and all forms of improper payments, including bribes and kickbacks.

Doximity and its officers, employees, agents, and representatives are prohibited from authorizing, making, offering, promising, requesting, receiving, or accepting bribes or kickbacks in any form.

This prohibition applies to all forms of bribery including commercial bribery and bribery of government officials, and applies regardless of whether the payment or offer of payment is made directly to the government official or indirectly through a third party. Remember, employees cannot use third parties to do something that they are prohibited from doing themselves.

The FCPA and other Anti-Corruption Laws prohibiting bribery are very broad, so that many kinds of gifts or entertainment provided to government employees might be considered improper. For that reason, employees must obtain ***prior written approval*** from the Compliance Officer before providing any payment or other in-kind benefits, including entertainment, to any government official.

In every circumstance, employees are prohibited from giving anything of value to any government official in order to wrongfully influence the government official, obtain or retain business or receive any advantage.

Examples of prohibited conduct include:

- payments made directly to a government official for an improper purpose;
- payments or gifts to third parties where an employee knows or has reason to know that at least a portion of the payments or gifts is likely to be offered by the third party to a government official for an improper purpose;
- acts “in furtherance of” an improper payment, such as arranging for funds to be available for the improper payment;
- payments to retain assets, such as an “under the table” payment to a tax official to settle a tax claim; and
- payments to obtain or retain business licenses or permits.

It is important to avoid even the appearance of impropriety. If any employee has any questions about whether a payment may be improper or violate this Policy, he or she should consult the Compliance Officer before any payment or offer is made.

## 4. IMPORTANT CONCEPTS

***“Government official”*** includes:

- any official or employee of a government, including any political party, administrative agency, or government-owned business;
- any person acting in an official capacity on behalf of a government entity;
- employees or agents of a business which is owned or controlled by a government;
- any person or firm employed by or acting for or on behalf of any government;
- any political party official, employee or agent of a political party, or candidate for political office (or political party position); and
- any family member or other representative of any of the above if circumstances indicate it is done because of the relationship.

Any doubts about whether a particular person is a government official should be resolved by assuming that the individual involved is a government official for anti-corruption purposes.

***“Anything of value”*** includes money and monetary equivalents (such as gambling chips and gift cards), entertainment, accommodations, and any other benefit. There is no “minimum” required under the Anti-Corruption Laws – any amount can be sufficient to trigger a violation. Likewise, even items that might otherwise seem appropriate like charitable donations or business meals are prohibited if they are in fact a pretense for funneling bribes or improper payments.

***“Improper advantage”*** includes payments intended to wrongfully:

- influence a decision by an official, including a failure to perform his, her or their official functions;
- induce an official to use his, her or their influence to affect a decision by someone else in his, her or their government; and
- induce an official to use his, her or their influence to affect or influence any act or decision.

In addition to obtaining or retaining business, “improper advantage” includes reducing taxes or duties, “looking the other way” at minor code or rule violations, and any form of preferential treatment.

## 5. GIFTS, ENTERTAINMENT, TRAVEL & PROMOTIONAL EXPENDITURES

Gifts in the business context can be an appropriate way for business people to display respect for each other. All employees are expected to use good judgment and moderation when giving or receiving entertainment or gifts. No gift or entertainment should ever be offered, authorized, given, provided or accepted by an employee unless it:

- is reasonable and not extravagant (such as shirts or tote bags that reflect a business name and/or logo);
- is appropriate under the circumstances and serves a valid business purpose;
- does not violate any U.S., local or international laws or regulations and is customary and appropriate under U.S. and local customs;
- is not being offered for any improper purpose, and could not be construed as a bribe, kickback or payoff;
- does not violate any Doximity policy;
- has a valid business purpose and is reasonable and necessary under the circumstances; and
- is fully and accurately reflected in the employee's expense report, Doximity's books and records, and backed by receipts.

It is essential that employees accurately report expenditures for gifts or entertainment so that the purpose, amount and recipient of the gift are obvious (i.e., transparent) to finance and other personnel who may review Doximity's books and records. Expense reports should accurately state the purpose of the expenditures and the identities of the individuals receiving the gifts or entertainment and state whether the gift or entertainment was given to a government official and identify the government entity.

Significant legal restrictions apply with regard to providing gifts, travel, hospitality or entertainment to government officials. Accordingly, Doximity **requires prior written approval from the Compliance Officer** for each of the following:

- any gifts, travel, hospitality, entertainment, in-kind benefit or payment, or other expense related to government officials;
- upfront or advance payments relating to or involving government officials; and
- sponsorship payments relating to or involving government officials.

Employees should avoid even the appearance of impropriety. Any gift or expense that is lavish or might otherwise prove embarrassing for the Company is prohibited. If any employee has any questions regarding the appropriateness of any gift or expense, he or she should consult the Compliance Officer prior to giving the gift or incurring the expense.

## 6. FACILITATING PAYMENTS

Any and all facilitating or "grease" payments are prohibited. While the FCPA and other Anti-Corruption Laws may provide limited exceptions for certain minor payments for the purpose of facilitating or expediting routine, lawful services or non-discretionary administrative actions, such as telephone installation, other Anti-Corruption Laws prohibit such payments. Accordingly, it is Doximity's policy that any and all facilitating payments are prohibited.

## **7. REPRESENTATIVES, PARTNERS, CONSULTANTS, DISTRIBUTORS, AGENTS AND OTHER THIRD PARTIES**

Doximity conducts appropriate, risk-based due diligence on transactions and third parties in order to provide assurance that such transactions and third parties will comply with Doximity's policies and the law. The degree of due diligence will vary in each situation, depending on the amount and nature of the transaction and the level of risk associated with the third party or transaction.

In addition, every employee is responsible for conducting appropriate due diligence before initiating a relationship with a third party, issuing a payment, or incurring an expense to assure his, herself or themselves that the third party will not engage in improper conduct and that the payment or expense does not violate this Policy or the law. In conducting due diligence and throughout any subsequent relationship, employees must monitor for "red flags." A list some red flags to watch for is provided below.

Employees should consult the Compliance Officer regarding any questions about the appropriate due diligence procedure for their situation.

## **8. RED FLAGS**

Doximity employees are expected to say something when they see something. If an employee sees "red flags" or other circumstances that suggest a potential violation of this Policy or the law, he or she must not turn a blind eye. An employee may be legally liable under the FCPA or other Anti-Corruption Laws if the employee ignores signs of bribery or corruption, including with respect to third parties. If an employee sees something that suggests someone at Doximity or one of its agents might be acting in violation of this Policy, he or she should immediately contact the Compliance Officer at the email address designated for such person.

While conducting Doximity business, including any due diligence and a subsequent relationship with a third party, employees must monitor for any "red flags." A "red flag" is a fact or circumstance that requires additional consideration and extra caution. Red flags may appear in many forms and can include:

- payments in a country with a history or reputation for corruption;
- refusal to provide a certification of compliance with Anti-Corruption Laws;
- unusual payment patterns or requests, including payments to third parties in cash, and payments made to bank accounts outside the country;
- representations or boasting about influence or connections;
- use of a shell or holding company that obscures ownership without credible explanation;
- accusations of improper business practices (credible rumors or media reports, etc.);
- family or business relationship with the government or a government official;

- unusually high commissions, agents' fees, or payments for goods or services;
- apparent lack of qualifications or resources;
- whether the representative or joint venture partner has been recommended by an official of the potential government customer;
- requests to be able to make agreements without the Company's approval; and
- requests that agreements or communications be kept secret.

Each employee is responsible for monitoring his, her or their email and other communications and documents for red flags. Any red flags should be brought promptly to the attention of the employee's supervisor or the Compliance Officer. Failure to do so is considered a violation of this Policy.

## **9. BOOKS AND RECORDS**

All employees must maintain accurate records of all transactions and assist in ensuring that the Company's books and records accurately and fairly reflect, with appropriate detail, all transactions, expenses, or other dispositions of assets. To that end, every employee is prohibited from falsifying any business or accounting record and must truthfully report and record all dispositions of assets. Undisclosed or unrecorded funds or assets—for any purpose—are prohibited. Any questions on how to record transactions should be referred to the Company's Compliance Officer.

## **10. REPORTING BREACHES OF THIS POLICY**

No policy can anticipate every situation that may arise. Accordingly, this Policy is not meant to be all-inclusive, but rather it is intended to serve as a source of guiding principles and to encourage communications and dialogue concerning standards of conduct addressed in this Policy. Employees are encouraged to reach out to the Compliance Officer with questions about particular circumstances that may implicate the provisions of this Policy.

Compliance with this Policy is, first and foremost, the individual responsibility of every Doximity employee. Doximity relies on each employee to uphold Doximity's high standards of conduct. All violations or suspected violations of this Policy or the law should be promptly reported to the Compliance Officer. Awareness of and failure to report a violation or possible violation may result in disciplinary action, including possible termination of employment.

**It is against Doximity's policy to retaliate against any person for making a good-faith report of a potential violation related to this Policy, Doximity's Code of Conduct or a violation of law.**

In addition to the guidelines set forth above, all employees must comply with Doximity's Code of Conduct. Consult the Code of Conduct for additional guidance on reporting potential violations.

## **11. CERTIFICATION AND ENFORCEMENT**

From time to time, employees may be required to complete anti-corruption training and sign a certification acknowledging commitment to, full understanding of, and compliance with this Policy. The acknowledgment statement shall be included in the personnel file of each such employee. Any Doximity employee who violates this Policy or who fails to make or falsifies any certification required under this Policy may be subject to disciplinary action, up to and including termination of employment.