

## DOXIMITY, INC.

### Code of Business Conduct and Ethics

#### I. Purpose and Scope

The Board of Directors of Doximity, Inc. (together with its subsidiaries, the “Company”) has adopted this Code of Business Conduct and Ethics (this “Code”) to aid the Company’s directors, officers and employees in making ethical and legal decisions when conducting the Company’s business and performing their day-to-day duties.

The Audit Committee (the “Audit Committee”) of the Company’s Board of Directors (the “Board”) is responsible for administering the Code. The Board has also delegated day-to-day responsibility for administering and interpreting the Code to the Chief Compliance Officer.

The Company expects its directors, officers and employees to exercise reasonable judgment when conducting the Company’s business. The Company encourages its directors, officers and employees to refer to this Code frequently to ensure that they are acting within both the letter and spirit of this Code. The Company also understands that this Code will not answer every problem you may encounter or address every concern you may have about conducting the Company’s business ethically and legally. In these situations, or if you otherwise have questions or concerns about this Code, the Company encourages you to speak with your supervisor (if applicable) or, if you are uncomfortable doing that, with the Chief Compliance Officer.

The Company’s directors, officers and employees generally have other legal and contractual obligations to the Company. This Code is not intended to reduce or limit the other obligations you may have to the Company. Instead, this Code should be viewed as imposing the *minimum standards* the Company expects from its directors, officers and employees in the conduct of the Company’s business.

#### II. Standards of Conduct

In addition to abiding by our Company values and providing and promoting a discrimination-free environment, the Company is committed to standards of conduct outlined herein.

##### A. Compliance with Laws, Rules and Regulations

The Company requires that all employees, officers and directors comply with all laws, rules and regulations applicable to the Company wherever it does business. Not in limitation of the foregoing, the Company is committed to complying with all laws pertaining to freedom of association, collective bargaining, immigration, wages, hours, and benefits as well as laws prohibiting forced, compulsory and child labor. You are expected to use good judgment and common sense in seeking to comply with all applicable laws, rules and regulations and to ask for advice when you are uncertain about them.

A number of training resources for this Code are available, including in-person training at all new hire orientation sessions and explanatory summaries posted on the Company's internal websites. In addition, you may contact the Chief Compliance officer regarding any additional inquiries at any time. If you become aware of the violation of any law, rule or regulation by the Company, whether by its officers, employees, directors, or any third party doing business on behalf of the Company, it is your responsibility to promptly report the matter to your supervisor or to the General Counsel. While it is the Company's desire to address matters internally, nothing in this Code should discourage you from reporting any illegal activity, including any violation of the securities laws, antitrust laws, environmental laws or any other federal, state or foreign law, rule or regulation, to the appropriate regulatory authority. Employees, officers and directors shall not discharge, demote, suspend, threaten, harass or in any other manner discriminate or retaliate against an employee because he or she reports any such violation, unless it is determined that the report was made with knowledge that it was false. This Code should not be construed to prohibit you from testifying, participating or otherwise assisting in any state or federal administrative, judicial or legislative proceeding or investigation.

The Company has a strict policy against any and all types of workplace harassment, including sexual harassment and other forms of workplace harassment and strives to provide all employees with an environment free of sexual or other harassment, discrimination and abusive conduct. In keeping with this policy, the Company strictly prohibits discrimination and harassment of any kind, including discrimination and harassment against individuals on the basis of membership in any protected category, perception that anyone is in a protected category or any other classification protected by applicable local, state or federal employment discrimination laws. Our anti-harassment and anti-discrimination policy applies to all persons involved in the operation of the Company and prohibits discrimination and harassment by any employee of the Company, including employees, as well as any clients, vendors, partners, customers, independent contractors, philanthropic support, visitors to our offices, or any other person having contact with Company employees.

## **B. Conflicts of Interest**

The Company recognizes and respects the right of its directors, officers and employees to engage in outside activities that they may deem proper and desirable, provided that these activities do not impair or interfere with the performance of their duties to the Company or their ability to act in the Company's best interests. In most, if not all, cases this will mean that our directors, officers and employees must avoid situations that present a potential or actual conflict between their personal interests and the Company's interests.

A "conflict of interest" occurs when a director's, officer's or employee's personal interest interferes with the Company's interests. Conflicts of interest can arise in many situations. For example, conflicts of interest can arise when a director, officer or employee takes an action or has an outside interest, responsibility or obligation that can make it difficult for him, her or them to perform the responsibilities of his, her or their position objectively or effectively in the Company's best interests. Conflicts of interest can also occur when a director, officer or employee or his, her or their immediate family member receives some personal benefit (whether improper or not) as a result of the director's, officer's or employee's position with the Company. Each individual's

situation is different and in evaluating his, her or their own situation, a director, officer or employee will have to consider many factors.

Any material transaction, responsibility, obligation, or relationship that reasonably could be expected to give rise to a conflict of interest should be reported promptly to the Chief Compliance Officer, who may notify the Board or a committee of the Board as he or she deems appropriate. Actual or potential conflicts of interest involving a director or executive officer other than the Chief Compliance Officer should be disclosed directly to the Chief Compliance Officer. Actual or potential conflicts of interest involving the Chief Compliance Officer should be disclosed directly to the Chief Executive Officer.

### **C. Insider Trading**

Employees, officers and directors who have material non-public information about the Company or other companies, including our suppliers and customers, as a result of their relationship with the Company are prohibited by law and Company policy from trading in securities of the Company or such other companies, as well as from communicating such information to others who might trade on the basis of that information. To help ensure that you do not engage in prohibited insider trading and avoid even the appearance of an improper transaction, the Company has adopted an Insider Trading Policy, which is distributed to employees and is also available from the Legal Department and posted in our internal Wiki for employees.

If you are uncertain about the constraints on your purchase or sale of any Company securities or the securities of any other company that you are familiar with by virtue of your relationship with the Company, you should consult with the General Counsel before making any such purchase or sale.

### **D. Confidentiality**

Employees, officers and directors must maintain the confidentiality of confidential information entrusted to them by the Company or other companies, including our suppliers and customers, except when disclosure is authorized by a supervisor or legally mandated. Unauthorized disclosure of any confidential information is prohibited. Additionally, employees should take appropriate precautions to ensure that confidential or sensitive business information, whether it is proprietary to the Company or another company, is not communicated within the Company except to employees who have a need to know such information to perform their responsibilities for the Company. Employees are reminded that they are bound by the terms of the At-Will Employment, Confidential Information, Invention Assignment, and Arbitration Agreement that they signed upon employment.

Third parties may ask you for information concerning the Company. Subject to the exceptions noted in the preceding paragraph, employees, officers and directors (other than the Company's authorized spokespersons) must not discuss internal Company matters with, or disseminate internal Company information to, anyone outside the Company, except as required in the performance of their Company duties and, if appropriate, after a confidentiality agreement is in place. This prohibition applies particularly to inquiries concerning the Company from the media, market professionals (such as securities analysts, institutional investors, investment advisers,

brokers and dealers) and security holders. All responses to inquiries on behalf of the Company must be made only by the Company's authorized spokespersons. If you receive any inquiries of this nature, you must decline to comment and refer the inquirer to your supervisor or one of the Company's authorized spokespersons, which may be accomplished by emailing IR@doximity.com or PR@doximity.com.

You also must abide by any lawful obligations that you have to your former employer, including restrictions on the use and disclosure of confidential information.

**E. Honest and Ethical Conduct and Fair Dealing; Conducting Business with Customers, Suppliers and Others**

Employees, officers and directors should endeavor to deal honestly, ethically and fairly with the Company's suppliers, customers, competitors and employees. Statements regarding the Company's products and services must not be untrue, misleading, deceptive or fraudulent. You must not take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts or any other unfair-dealing practice.

The Company is committed to being a responsible corporate citizen and expects the same of its customers and business partners. The Company will not knowingly conduct business with any individual or company that participates in the exploitation of children, human trafficking, or forced, compulsory or child labor, or other such human rights violations. In the event any employee, officer or director of the Company becomes aware (or has any reason to believe) that any organization with whom the Company has a business relationship engages in any such violations, this must be reported immediately to the Chief Compliance Officer.

**F. Corporate Opportunities**

Directors, officers and employees owe a duty to the Company to advance its legitimate business interests when the opportunity to do so arises. Each employee, officer and director is prohibited from:

- diverting to himself, herself or themselves or to others any opportunities that are discovered through the use of the Company's property or information or as a result of his, her or their position with the Company unless that opportunity has first been presented to, and rejected by, the Company;
- using the Company's property or information or his, her or their position for improper personal gain;
- competing with the Company, or
- using the Company's assets and services for personal benefit rather than for the legitimate business purposes of the Company.

**G. Political Contributions/Gifts**

Business contributions to political campaigns are strictly regulated by federal, state, provincial and local law in the U.S. and many other jurisdictions. Accordingly, all political contributions proposed to be made with the Company's funds must be coordinated through and approved by the Chief Compliance Officer. Directors, officers and employees may not, without the approval of the Chief Compliance Officer, use any Company funds for political contributions of any kind to any political candidate or holder of any national, state or local government office. Directors, officers and employees may make personal contributions, but should not represent that they are making contributions on the Company's behalf. Specific questions should be directed to the Chief Compliance Officer.

#### **H. Bribes, Kickbacks and Other Improper Payments**

The Company does not permit or condone bribes, kickbacks or other improper payments, transfers or receipts. No director, officer or employee should offer, give, solicit or receive any money or anything of value for the purpose of obtaining, retaining or directing business or bestowing or receiving any kind of favored treatment. "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 these standards – any amount can be sufficient to trigger a violation. Please also review the Company's Anti-Corruption Policy for more information.

#### **I. International Trade Controls**

Many countries regulate international trade transactions, such as imports, exports and international financial transactions and prohibit boycotts against countries or firms that may be "blocked" by certain groups or countries. The Company's policy is to comply with these regulations and prohibitions even if compliance may result in the loss of some business opportunities. Employees should learn and understand the extent to which international trade controls apply to transactions conducted by the Company.

#### **J. Accuracy of Records**

Employees, officers and directors must honestly and accurately report all business transactions. You are responsible for the accuracy of your records and reports. Accurate information is essential to the Company's ability to meet legal and regulatory obligations.

All Company books, records and accounts shall be maintained in accordance with all applicable regulations and standards and accurately reflect the true nature of the transactions they record. The financial statements of the Company shall conform to generally accepted accounting rules and the Company's accounting policies. No undisclosed or unrecorded account or fund shall be established for any purpose. No false or misleading entries shall be made in the Company's books or records for any reason, and no disbursement of corporate funds or other corporate property shall be made without adequate supporting documentation.

#### **K. Quality of Public Disclosures**

It is the policy of the Company to provide full, fair, accurate, timely and understandable disclosure in reports and documents filed with, or submitted to, the Securities and Exchange Commission and in other public communications.

### **III. Compliance Procedures**

#### **A. Communication of Code**

All current directors, officers and employees are being supplied a copy of the Code. Future directors, officers and employees will be supplied a copy of the Code when beginning service at the Company. All directors, officers and employees will be expected to review and acknowledge the Code on a periodic basis. Updates of the Code, when adopted, will be promptly supplied to directors, officers and employees. Directors, officers and employees also can obtain a copy of the Code by requesting one from the human resources department or by accessing the Company's website at [www.doximity.com](http://www.doximity.com).

#### **B. Monitoring Compliance and Disciplinary Action**

The Company's management, under the supervision of the Audit Committee, shall take reasonable steps to (i) monitor compliance with the Code, and (ii) when appropriate, impose and enforce appropriate disciplinary measures for violations of the Code.

Disciplinary measures for violations of the Code will be determined in the Company's sole discretion and may include, but are not limited to, counseling, oral or written reprimands, warnings, probation or suspension with or without pay, demotions, reductions in salary, termination of employment or service, and restitution.

The Company's management shall periodically report to the Audit Committee on these compliance efforts including, without limitation, alleged violations of the Code and the actions taken with respect to violations.

#### **C. Communication Channels**

*Be Proactive.* Every employee is encouraged to act proactively by asking questions, seeking guidance and reporting suspected violations of the Code and other policies and procedures of the Company, as well as any violation or suspected violation of law, rule or regulation resulting from the conduct of the Company's business or occurring on the Company's property. **If an employee believes that actions have taken place, may be taking place, or may be about to take place that violate or would violate the Code or any law, rule or regulation applicable to the Company, he or she is obligated to bring the matter to the attention of the Company.** Our whistleblower hotline number is 855-440-0008. An online reporting option is: <https://www.lighthouse-services.com/doximity>.

*Seeking Guidance.* The best starting point for officers or employees seeking advice on ethics related issues or wishing to report potential violations of the Code will usually be their supervisor. However, if the conduct in question involves an officer's or employee's supervisor, if the officer or employee has reported the conduct in question to the supervisor and does not believe that the supervisor has dealt with it properly, or if the officer or employee does not feel comfortable

discussing the matter with the supervisor, the officer or employee may raise the matter with the Chief Compliance Officer.

*Communication Alternatives.* Any officer or employee may communicate with the Chief Compliance Officer, or report potential violations of the Code, by any of the following methods:

- By e-mail to [legal@doximity.com](mailto:legal@doximity.com) or the direct email address of the General Counsel of the Company (anonymity cannot be maintained);
- In writing (which can be done anonymously as set forth below under “Anonymity”), addressed to the Chief Compliance Officer, by mail to the Company’s corporate address;
- Online at <https://www.lighthouse-services.com/doximity> (which can be done anonymously as set forth below under “Anonymity”); or
- By phoning and leaving a voicemail. The voicemail can be reached at 855-440-0008 and messages can be left anonymously as set forth below under “Anonymity.”

*Reporting Accounting and Similar Concerns.* Concerns or questions regarding potential violations of the Code, a Company policy or procedure or laws, rules or regulations relating to accounting, internal accounting controls, or auditing or securities law matters will be directed to the Audit Committee or a designee of the Audit Committee in accordance with the procedures established by the Audit Committee for receiving, retaining and treating complaints regarding accounting, internal accounting controls or auditing matters as attached hereto as Exhibit A. Officers and employees can also communicate directly with the Audit Committee regarding such matters by the following methods (which can be done anonymously as set forth below under “Anonymity”).

- By e-mail to [legal@doximity.com](mailto:legal@doximity.com) or the direct email address of the General Counsel of the Company (anonymity cannot be maintained);
- In writing (which can be done anonymously as set forth below under “Anonymity”), addressed to the Chief Compliance Officer, by mail to the Company’s corporate address;
- Online at <https://www.lighthouse-services.com/doximity> (which can be done anonymously as set forth below under “Anonymity”); or
- By phoning and leaving a voicemail. The voicemail can be reached at 855-440-0008 and messages can be left anonymously as set forth below under “Anonymity.”

*Cooperation.* Employees are expected to cooperate with the Company in any investigation of a potential violation of the Code, any other Company policy or procedure, or any law, rule or regulation.

*Misuse of Reporting Channels.* Employees should not use these reporting channels in bad faith or in a false or frivolous manner or to report grievances that do not involve the Code or other ethics-related issues.

*Director Communications.* In addition to the foregoing methods, a director also can communicate concerns or seek advice with respect to this Code by contacting the Board through its Chair or the Audit Committee.

**D. Anonymity**

The Company prefers that officers and employees, when reporting suspected violations of the Code, identify themselves to facilitate the Company's ability to take steps to address the suspected violation, including conducting an investigation. However, the Company also recognizes that some people may feel more comfortable reporting a suspected violation anonymously.

An officer or employee who wishes to remain anonymous may do so, and the Company will use reasonable efforts to protect confidentiality. If a report is made anonymously, however, the Company may not have sufficient information to investigate or evaluate the allegations. Accordingly, persons who report suspected violations anonymously should provide as much detail as they can to permit the Company to evaluate the allegation and, if it deems appropriate, conduct an investigation.

**E. No Retaliation**

The Company forbids any retaliation against an officer or employee who, acting in good faith on the basis of a reasonable belief, reports suspected misconduct. Specifically, the Company will not discharge, demote, suspend, threaten, harass or in any other manner discriminate against, such an officer or employee. Anyone who participates in any such conduct is subject to disciplinary action, including termination.

**F. Waivers and Amendments**

No waiver of any provisions of the Code for the benefit of a director or an executive officer (which includes, without limitation, the Company's principal executive, financial and accounting officers) shall be effective unless (i) approved by the Audit Committee, and (ii) if required, the waiver is promptly disclosed to the Company's securityholders in accordance with applicable U.S. securities laws and the rules and regulations of the exchange or system on which the Company's shares are traded or quoted, as the case may be.

Any waivers of the Code for other employees may be made by the Chief Compliance Officer or the Audit Committee.

All amendments to the Code must be approved by the Board and, if required, must be promptly disclosed to the Company's securityholders in accordance with United States securities laws and NYSE rules and regulations.

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ADOPTED: January 31, 2023

EFFECTIVE: January 31, 2023





**EXHIBIT A**  
**WHISTLEBLOWER POLICY**

The Audit Committee (the “**Audit Committee**”) of the Board of Directors (the “**Board**”) of Doximity, Inc. (together with its subsidiaries, “**Doximity**”) has established these procedures (the “**Procedures**”) with respect to the receipt, treatment and retention of complaints received by Doximity regarding (1) accounting, internal accounting controls or auditing matters, including the confidential, anonymous submission by employees of concerns regarding questionable accounting or auditing matters; (2) potential violations of the U.S. Foreign Corrupt Practices Act, the U.K. Bribery Act and similar anti-corruption laws of other nations (the “**Anti-Corruption Laws**”); or (3) potential violations of the U.S. federal securities laws, including any rules and regulations thereunder (collectively, “**Complaints**”).

**I. Procedures for Receiving Complaints**

**Complaints may be submitted to Doximity as follows:**

- To the extent permitted by applicable law, a complaining party may report his, her or their Complaint by placing a phone call to the “**Ethics Reporting Line**,” a third-party anonymous hosted hotline, by calling 855-440-0008. During this phone call, the complaining party should identify the subject matter of his, her or their Complaint and the practices that are alleged to constitute an improper accounting, internal accounting control or auditing matter, or a violation of the U.S. federal securities laws or the Anti-Corruption Laws, as the case may be, providing as much detail as possible; and/or
- To the extent permitted by applicable law, a complaining party may report his, her or their Complaint, which identifies the subject matter of his, her or their Complaint and the practices that are alleged to constitute an improper accounting, internal accounting control or auditing matter, or a violation of the U.S. federal securities laws or the Anti-Corruption Laws, providing as much detail as possible, via a website at <https://www.lighthouse-services.com/doximity>(the “**Ethics Reporting Website**”) by following the directions on the website; and/or
- A complaining party may submit a confidential memorandum to the Chairperson (the “**Chairperson**”) or any other member of the Audit Committee or to the Chief Compliance Officer which identifies the subject matter of his, her or their Complaint and the practices that are alleged to constitute an improper accounting, internal accounting control or auditing matter or a violation of the U.S. federal securities laws or the Anti-Corruption Laws, as the case may be, providing as much detail as possible. Such reports may be sent by sending a letter c/o Doximity, Inc., 500 3rd St. Suite 510, San Francisco, CA 94107; Attention: Audit Committee Chair.

Automatic email notification shall be provided to the Chairperson and Chief Compliance Officer of each Complaint received through the Ethics Reporting Line or Ethics Reporting Website. Doximity’s General Counsel, on the date these Procedures were adopted, has been appointed Doximity’s Chief Compliance Officer (the “**Chief Compliance Officer**”) for purposes herein. If the Chief Compliance Officer or other member of management is otherwise

notified or becomes aware of a Complaint, they will ensure that the Chairperson is promptly notified whether or not they believe an automatic email notification to the Chairperson has been generated.

To ensure that these Complaint Procedures are not inadvertently or improperly screening out Complaints that should be viewed by the Audit Committee, the Chief Compliance Officer will be charged with preparing and submitting, at each regularly scheduled meeting of the Audit Committee, a report detailing the time, date, nature and disposition of each complaint received by the Chief Compliance Officer, the Ethics Reporting Line, the Ethics Reporting Website or other channels since the date of the prior report.

## **II. Procedures for Treating Complaints**

Upon notification of a Complaint, the Chief Compliance Officer will update the Chairperson that a complaint has been received (even if he or she believes an automatic email notification to the Chairperson has been generated) and shall consult with the Chairperson to determine if investigation is warranted and/or the appropriate disposition of each Complaint.

If an investigation is determined to be appropriate, the Chairperson or the Chief Compliance Officer may directly supervise such investigation. The Chairperson or Chief Compliance Officer, as appropriate, will determine the appropriate person or persons to investigate a particular matter (the “**Investigator**”), which may include outside advisors or counsel. The Chairperson or Chief Compliance Officer, as appropriate, shall keep the Audit Committee informed as to the scope, status and results of any such investigations.

The Investigator and the Chairperson or Chief Compliance Officer, as appropriate, will determine when an investigation is complete and will then provide the conclusions of the investigation, including any corrective actions that management is undertaking, to the Audit Committee and any other appropriate parties.

## **III. Procedures for Retaining Records Regarding Complaints**

The Audit Committee will seek to ensure that all Complaints received by the Audit Committee, together with all documents pertaining to the Audit Committee’s or its designee’s investigation and treatment of any such Complaint, are retained in a secure location in accordance with any applicable record retention policies. If a Complaint becomes the subject of a criminal investigation or civil litigation, all documents related to that Complaint will be retained until such investigation or litigation is resolved, including all appeals. The Audit Committee may delegate this record retention obligation to an independent advisor or entity or the Chief Compliance Officer.

## **IV. Protection for Whistleblowers**

At no time will there be any retaliation by Doximity or at its direction against any employee for making a complaint in good faith pursuant to the procedures described herein regarding accounting, internal accounting controls or auditing matters, or potential violations of the U.S. federal securities laws or the Anti-Corruption Laws.

**V. Disciplinary Action**

Nothing in these procedures shall limit Doximity or the Board or a committee or designee thereof in taking such disciplinary or other action under Doximity's Code of Conduct or other applicable policies of Doximity as may be appropriate with respect to any matter that is the subject of a Complaint.

**VI. Periodic Review of Procedures**

The Audit Committee will review the procedures outlined above and consider changes to such procedures periodically.