EXACT SCIENCES CORPORATION
HUMAN RIGHTS AND LABOR POLICY

Scope and Purpose

This Human Rights and Labor Policy applies to all Exact Sciences Corporation and its subsidiaries (“we”, “us”, “our”, or “Exact”), to Exact’s operations and to all locations and situations where Exact’s business is conducted. The rules and principles outlined in this Policy apply to all Exact employees and other persons providing services to Exact (referred to in this policy as “employees”). Violations may result in disciplinary action in Exact management’s discretion up to and including termination.

Exact is committed to the rights of our team members to work in a safe, healthy and productive workplace. This commitment is fundamental to our core values and is further described in our Code of Business Conduct and Ethics and other applicable policies and procedures.

Exact bases its commitments to our team members and communities in which we operate on the International Labor Organization Conventions, the United Nations Universal Declaration of Human Rights, the United Nations’ Guiding Principles on Business and Human Rights, and the OECD Guidelines for Multinational Enterprises.

Exact’s Board of Directors is responsible for reviewing and overseeing our corporate responsibility policies. Our executive management team, including the Chief Executive Officer, Chief Compliance Counsel and General Counsel, oversees the implementation of these policies and coordinates our efforts to identify, address, train, and report on our human rights and labor risks and opportunities and to foster a dialogue on these issues with human rights experts, employees, shareholders, and other stakeholders.

Anti-Harassment and Non-Discrimination

Exact promotes a workplace that values differences and promotes an environment that is inclusive of all people and their unique abilities. A diverse workforce allows us to benefit from multiple viewpoints within our company and help us better relate to patients, business partners, clients, and other stakeholders. Discrimination on the basis of race, religion, color, age, gender, sexual orientation, gender identification or expression, national origin, citizenship, marital status, disability, veteran status, or any other category or characteristic protected by applicable law is prohibited and will not be tolerated under any circumstances. We also prohibit retaliation against any individual who in good faith reports discrimination or asserts their right to be free from such discrimination. The bases for recruitment, hiring, placement, development, training, compensation and advancement at Exact are qualifications, performance, skills, tenure, and experience.

At Exact, we treat one another with respect and courtesy. We avoid making disparaging comments about our fellow team members or others. Our company does not permit any form of unlawful discrimination or harassment. Harassment does not have to occur in the workplace or involve an Exact team member to violate our values or the law.
Freedom of Association and Collective Bargaining

Drawing on provisions of the International Labor Organization conventions 87 and 98, Exact is committed to complying with applicable laws regarding the rights of employees to join organizations or bargaining groups for representation and to engage in collective bargaining.

Safe and Healthy Workplace

The safety and health of our employees is of paramount importance. We are committed to providing a safe and healthy workplace and complying with all applicable safety and health laws and regulations. Exact’s commitment to the safety and health of our team members extends to all of our facilities and operations, as well as to those of our suppliers, vendors and contractors.

International Trade Partners

Exact may engage the services or require our suppliers, vendors and contractors to engage the services of a third-party inspection firm to ascertain that the international supplier, vendor or contractor is in compliance with fair labor standards and safety.

Modern Slavery

We endeavor to conduct our business ethically and with integrity in all of our commercial relationships and to ensure that no forced labor, modern slavery or human trafficking occurs anywhere in our business or supply chains. The UK Modern Slavery Act 2015 and other laws applicable in various jurisdictions around the world prohibit forced labor, modern slavery and human trafficking (collectively, “Modern Slavery Laws”). Employees who become aware of any potential or suspected violation of Modern Slavery Laws, involving the Company, its personnel or any of its suppliers, vendors or contractors, must report it to the Company’s Chief Compliance Counsel, or to the Company’s General Counsel.

Workplace Security

We are committed to maintaining a workplace that is free from violence, harassment, intimidation and other unsafe or disruptive conditions due to internal and external physical, verbal or online threats. We continuously evaluate our security profile and enhance security safeguards as needed, while maintaining respect for employee privacy and dignity.

Work Hours, Wages and Benefits

We strive to fully comply with all applicable wage, work hours, overtime and benefits laws as well the terms of applicable collective bargaining agreements.

The Environment

Exact is committed to operating its businesses and facilities and to producing its products in a manner that respects and protects human health and the environment. The Company requires that its operations are in compliance with all national, regional, and local regulations relating to the environment, such as those affecting air emissions, water purity and waste disposal. Compliance
with legal requirements is only a minimum standard. All employees are expected to be alert to environmental issues. Employees with responsibilities in any of these areas are expected to inform themselves of all standards applicable to their activities and to inquire of management if they are unsure of the requirements affecting their responsibilities.

**Guidance and Reporting for Employees**

We strive to create workplaces in which open and honest communications among all employees are valued and respected.

Exact is committed to complying with applicable labor and employment laws wherever we and our suppliers, vendors and contractors operate and adhering to and promoting human rights in accordance with the UN Guiding Principles on Business and Human Rights. Any employee who believes a conflict arises between the language of our policies and the laws, customs and practices of the employee’s work location, or who has questions about our policies or would like to confidentially report a potential violation of our policies, can raise those questions and concerns with local management or Human Resources. Employees can also anonymously report suspected violations of Company policies and laws by calling the Company’s Alertline (1-800-93-ALERT (25378)) or through the Integrity Alertline website at exactsciences.alertline.com. No reprisal or retaliatory action will be taken against any employee for raising their good faith concerns. The Company will investigate, address and respond to the concerns of employees and will take appropriate corrective action in response to any verified violation.

Adopted Effective October 20, 2022