



# CORPORATE RESPONSIBILITY REPORT

**2025**



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## ABOUT THIS REPORT

This report includes disclosures that are informed by the Sustainability Accounting Standards Board (SASB) standards for the Biotechnology & Pharmaceuticals and Medical Equipment & Supplies industries. All financial information is reported in U.S. dollars, and unless otherwise stated, this report covers fiscal years ending December 31, 2022, 2023, and 2024, as well as some key activities that occurred in 2025.

# A NOTE FROM OUR CO-CEOS

As we reflect on our journey at Guardant Health, founded on the mission to conquer cancer with data, we are filled with immense pride in the strides we have made. Over the past year, we've made meaningful progress in advancing our mission, including:

- Surpassing 500 peer-reviewed publications, deepening the clinical impact of liquid biopsy.
- Evolving Guardant360® test onto the Infinity Smart Liquid Biopsy platform.
- Securing Medicare coverage for colorectal cancer monitoring with Guardant Reveal®.
- Receiving FDA approval for, and launching, Shield™ to offer a simple blood test for colorectal cancer screening.

Calendar year 2024 was a testament to our dedication, marked by 31% revenue growth. With over 170 biopharma partners, operations spanning across over 60 countries, and a robust portfolio of more than 700 global patents and patent applications, Guardant Health continues to pave the way in the field of liquid biopsy for cancer therapy selection. As we navigate the complexities of our industry, our focus on our core values remains steadfast, driving us forward in our pursuit of innovation, excellence, and, most importantly, putting the patient first.

In the pursuit of our growth plans, we remain determined to operate our business responsibly and sustainably. We have taken important steps to evaluate the greenhouse gas emissions associated with our operations so that we can strategically identify reduction and other climate action opportunities. We have begun engaging our key suppliers more systematically to communicate our expectations around responsible and ethical business conduct. We have also made notable strides in building an exceptional company culture that fosters innovation, connects our employees to our mission, and accelerates our patient-centric vision. Our culture of continual improvement drives us to advance our commitment to corporate responsibility as we deliver on our mission of conquering cancer with data.

Sincerely,



**Helmy Eltoukhy** | *PhD, Chairman & Co-CEO*



**AmirAli Talasaz** | *PhD, Director & Co-CEO*

# OUR APPROACH TO CORPORATE RESPONSIBILITY

Our vision is to transform cancer care by creating impactful diagnostic tools that will be affordable and accessible to far more patients around the world. We are driven by an intense passion to dramatically change the course of cancer patients' journeys. Our frustration with the data-starved status quo and our strong desire to improve human health shapes our unique culture. Our mission — to conquer cancer — is fully integrated into our business strategy.

Guided by our core values, we are committed to advancing breakthrough science and giving patients the opportunity to live healthier lives. This commitment is central to how we operate and foundational to our approach to corporate responsibility. We believe that to serve patients well, it is important to also act responsibly in our relationships with our employees, our communities and the environment.

As our corporate responsibility journey progresses, we intend to provide increased transparency around our efforts. This report provides information related to key environmental, social, and governance (ESG) issues specific to our business. We identified these topics after analyzing external reporting frameworks such as the Sustainability Accounting Standards Board (SASB), peer company practices, third-party rating agency assessments, and input from investors, customers, and other stakeholders.

The Nominating and Corporate Governance Committee of our Board of Directors is responsible for overseeing our corporate responsibility and ESG strategy, initiatives, and policies. The Compensation Committee also supports the Nominating and Corporate Governance Committee for matters pertaining to human capital management.

## We have laid out the following commitments as part of our corporate responsibility strategy:



Providing meaningful work and development opportunities to our employees



Striving to recruit, hire, and retain a talented and diverse team of people who align with our values, and fostering a diverse, inclusive, and equitable workplace



Conducting our business with the highest professional and ethical standards and operating with integrity and mutual respect



Maintaining a well-developed environmental, health, and safety program, which is reinforced through rigorous policies, education, and engagement of our employees and internal and external periodic audits



Making it easy and affordable to complete our tests



Investing in environmental sustainability and responsible supply chain operations

# TRANSFORMING CANCER CARE

At Guardant Health, we put patients first, and our mission is their future. We are dedicated to helping patients at all stages of cancer live longer and healthier lives through the power of blood tests and the data they unlock. Our vision is to transform the biotechnology industry by creating impactful screening and diagnostic tools that will be affordable and accessible to patients worldwide.

We provide doctors with critical insights that give them greater confidence in the decisions they make every day in the fight against cancer. We are the first company to develop tests that span the continuum of cancer care: from informing treatment decisions in patients with advanced cancer, to new ways of monitoring recurrence in cancer survivors, to screening for cancer at its earliest and most treatable stages in the general population.

Each of our products reflects our focus on addressing patients' most critical unmet needs and improving overall quality of care. Our blood-based testing can be easily performed with a simple blood draw at a doctor's office and contributes to a better quality of life for more patients now and in the future.

Our comprehensive product ecosystem has provided over 15,000 clinicians globally with actionable insights across all stages of the cancer journey, underscoring our dedication to a patient-first approach. In 2024, we delivered key milestones in therapy selection, minimal residual disease (MRD), and screening across the continuum of cancer care.

Delivered key milestones across the **continuum of cancer care** in 2024

## THERAPY SELECTION

- Profitable core business
- Increased G360 ASP
- Launched Smart Liquid Biopsy for G360
- Volume growth in U.S.
- International expansion

## MRD

- CRC data published
- Breast data submitted
- CRC MoIDX data submitted
- Volume growth

## SCREENING

- Shield FDA approval
- Shield Medicare reimbursement
- Shield IVD launched

We are **committed to serving patients** by:

- Developing a blood test for cancer screening, starting with colorectal cancer, that will enable cancer screening from a routine blood draw.
- Helping doctors better manage their patients with early-stage cancer by identifying the risk of recurrence after surgery and monitoring recurrence over time.
- Helping doctors select the best treatment for their patients with advanced cancer and then monitoring response to that treatment so adjustments can be made.
- Helping the biopharmaceutical industry accelerate its drug development to bring the next generation of precision medicines to patients sooner.

## Expanding Access to Precision Oncology

We are a leading precision oncology company focused on guarding wellness and giving every person more time free from cancer. We are transforming patient care by providing critical insights into what drives disease through our advanced blood and tissue tests and real-world data. Our tests help improve outcomes across all stages of care, including screening to find cancer early, monitoring for recurrence in early-stage cancer, and helping doctors select the best treatment for patients with advanced cancer.

To increase awareness of our products, we aim to build recognition of liquid biopsy and promote a blood-first approach for genotyping cancer patients. We strive to educate biopharmaceutical companies, key opinion leaders (KOLs), and advocacy groups, advocate for the inclusion of our tests in treatment guidelines and expand global access to our products through direct investment and leveraging our global network of partners.

## Shield Blood Test™



Cancer screening is a proven way to detect cancer early when it is most treatable. However, 1 in 3 eligible Americans do not complete colorectal cancer screening in part because they find the current options unpleasant or inconvenient.<sup>1</sup>

In July 2024, we received FDA approval of our Shield blood test for colorectal cancer screening in adults aged 45 and older who are at average risk for the disease. In August 2024, our Shield blood test became commercially available in the U.S. as the first blood test approved by the FDA for primary colorectal cancer screening. Now, healthcare providers can offer Shield in a manner similar to all other non-invasive methods recommended in screening guidelines.

Blood-based screening tests like Shield, which can be completed with a simple blood draw, have the potential to improve screening adherence and identify more cancers early, when they are most treatable.

<sup>1</sup> Westesson O, Axelrod H, Dean J, He Y, Sample P, Zotenko E, et al. Abstract 2316: Integrated genomic and epigenomic cell-free DNA (cfDNA) analysis for the detection of early-stage colorectal cancer. Proceedings: AACR Annual Meeting 2020; Cancer Res 2020;80; 10.1158/1538-7445.AM2020-2316.<



We're proud to be featured on [TIME's list of Best Inventions of 2024](#), with our Shield blood test recognized in the medical care category.

*We're honored to be a part of this prestigious list of leading innovative products that are making a dramatic difference in how we live our lives today. We created Guardant Health with the vision to detect and characterize cancer across the spectrum, and now we are able to do this with colorectal cancer at earlier stages with the launch of Shield. This has the opportunity to transform cancer detection and save millions of lives.*

**- AmirAli Talasaz, Co-CEO**



The Shield blood test was recognized as the Health category winner in [Popular Science's 50 Greatest Inventions of 2024](#).

Guardant Health Shield Platform Selected for Inclusion in National Cancer Institute's [Vanguard Study](#) to Evaluate Emerging Technologies for Multi-Cancer Detection.

We were named a [Digiday 2024 Greater Goods Awards](#) winner in the public health category for the launch of the Shield blood test.

*As a practicing Gastroenterologist who has witnessed, first-hand, the impact that a colorectal cancer diagnosis has on an entire family, I value the steps that Guardant Health is taking to bring innovative diagnostics to the market and to partner with the advocacy community to raise awareness of these technologies and get them into the hands of the patients and people who need them most. Having a new screening option – like the Shield™ blood test – that I can administer in my office, or also conveniently use outside of the office and within the community, is a game-changer in our fight against the disease and a critical tool for helping more people get screened.*

**- Andrew Albert, MD MPH**

*Having caught the cancer at an early stage certainly prolonged my life. I enjoy skiing, I play golf. I don't know that I would still be here doing all of that had I not taken the Shield blood test.*

**- John Gormly, Stage II Colon Cancer Survivor**

## Guardant Infinity Platform: The “Smart” Liquid Biopsy

We have built an innovative product portfolio over the past decade spanning the continuum of cancer care. Every groundbreaking test in our product portfolio is constructed from and shares the same “smart” liquid biopsy platform, known as Guardant Infinity. Launched in 2022, Guardant Infinity drives synergies across our entire product family. This means that every test offered by Guardant – from Shield to Reveal to Guardant360 – is powered by this AI-enabled platform, generating a self-reinforcing cycle of innovation across the entire cancer care continuum. Insights from one product enhance the performance of another, enabling continuous improvement, accelerated clinical discovery by oncologists, and ultimately better outcomes for our patients.

The Guardant Infinity platform combines the power of liquid biopsy with breakthrough chemistry, enabling powerful insights into cancer through one simple blood draw. While genomics has helped chart a path toward personalized medicine, genomics alone cannot account for the enormous diversity between cells in our own body. The cells in our eyes, liver, and skin look and behave completely differently, but they are identical through a genomic lens. In the epigenomic domain, almost every imaginable disease has a robust fingerprint, but this area has been largely unexplored for a variety of technological reasons.

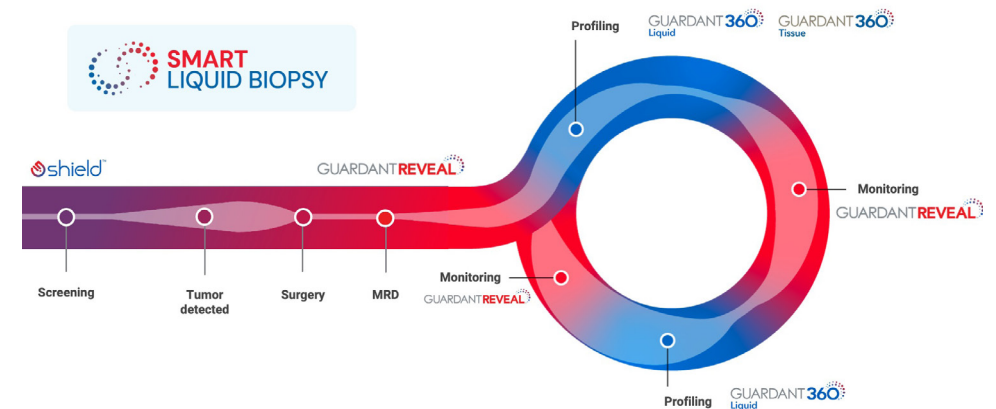
The Guardant Infinity platform unlocks the power of both genomics and epigenomics to show a more fulsome view of cancer, delivering 100 times more genomic breadth and 50 times higher sensitivity than genomic profiling alone. Our research has enabled us to develop revolutionary new approaches and a powerful informatics pipeline that enables broad interrogation of the epigenome at a lower cost. Our platform is a critical inflection point for the precision oncology field and a driver of the next chapter of growth for our business. As we merge all our clinical oncology products onto the platform, we can rapidly deploy performance improvements and new applications across products, enabling R&D efficiencies, lower costs, and industry-leading turnaround times.

In 2024, we upgraded Guardant360 to Guardant 360 Liquid, transitioning to the “smart” liquid biopsy platform. This has been the most significant upgrade to our flagship product, as it improves sensitivity for tumor burden detection by a tenfold factor and expands the number of genes by a factor of ten as well. Furthermore, Guardant Health

is launching Guardant 360 Tissue, expanding into the tissue side of the Comprehensive Genetic Profiling (CGP) market and applying “smart” platform technology for tissue CGP testing.

Early-stage cancer detection is just scratching the surface of what the Guardant Infinity platform can do. By providing a comprehensive, multi-dimensional understanding of a patient’s tumor, the tumor’s microenvironment, and the patient’s immune response, the Guardant Infinity platform is delivering a key component of our strategy to pioneer a blood-first paradigm for genotyping cancer patients and drive commercial adoption. This AI-enabled platform is uniquely positioned to evolve into one of the most advanced genomics technologies in the country, offering multi-modal insights at impressive specificity and speed. It is a foundational pillar of our innovation flywheel, driving platform evolution, and next-generation cancer diagnostics.

## One platform for the entire patient journey





## Addressing Disparities in Cancer Screening

One of the applications we have launched on our Guardant Infinity platform is the aforementioned Shield, our screening test for colorectal cancer (CRC). CRC is the second-leading cause of cancer-related death in the U.S. While CRC is curable if caught early, 1 in 3 adults have not completed the recommended screening for the disease. Barriers associated with currently available diagnostic methods, such as a colonoscopy or a stool-based test, can make the process unpleasant, time-consuming, and difficult to complete.

Moreover, underscreening is an important factor that contributes to the high cancer mortality in underserved populations. For example, only 59% of individuals aged 50 and older who are Hispanic and 65% of individuals who are Black/African American are up to date with CRC recommended screenings, compared to 68% of individuals who are White. These underserved populations may face additional barriers to cancer screening, including lack of healthcare access, limited capacity in healthcare systems, transportation challenges, childcare, and lack of paid leave from work.

With a simple blood draw, the Shield test can help overcome these barriers because it requires no special preparation, no sedation, no dietary changes, no extra time away from family or work, and it can be completed as part of any patient office visit. In 2022, we announced positive results from our ECLIPSE study, which validates Shield as a high-sensitivity blood test that can significantly enhance adherence to CRC screening. Among the initial 8,000 individuals for whom the test was ordered during a routine visit with their physician, 90% completed the test. This is in stark contrast with adherence rates ranging from 43% to 66% for other non-invasive stool tests. Furthermore, we have initiated an additional study with the Center for Asian Health Equity – University of Chicago Medicine (CAHE-UCM) to examine patient preference and adherence for Shield screening. While Shield is initially indicated for CRC screening, we will soon expand into multi-cancer screening, including lung, pancreas, and other areas where we believe cancer screening can save lives.

<sup>2</sup> <https://www.fda.gov/drugs/drug-approvals-and-databases/drug-trials-snapshots>

<sup>3</sup> <https://www.fiercebiotech.com/biotech/women-asian-and-black-participants-underrepresented-covid-19-clinical-trials-researchers>

<sup>4</sup> <https://www.globaldata.com/store/report/diversity-in-clinical-trials-insight-analysis/>

## Advocating for Diversity in Clinical Trials

We believe that achieving diversity in clinical studies is crucial to improving overall health equity. Unfortunately, most clinical trials in the U.S. today enroll a patient population that is not reflective of our nation's diversity.<sup>2</sup> For example, in more than 100 clinical trials for preventive measures and treatments for COVID-19, women, Asian, and Black participants were underrepresented.<sup>3</sup> Another study showed that Black Americans comprised only 3% of oncology clinical trial participants between 2013-2022, despite having a higher cancer burden than the rest of the population on average.<sup>4</sup>

Clinical trials must reflect the diverse populations who will benefit from treatment, and our ECLIPSE study was designed to reflect the diversity of the U.S., our primary market segment. We successfully enrolled over 20,000 individuals from 34 states between the ages of 45-84, achieving 13% enrollment among Black Americans, 15% among Hispanics, and 7% among Asian Americans. This is largely in line with U.S. demographics and above average for historical clinical trial enrollment.

Guardant has been leading the way in our approach to creating diverse patient populations in clinical trials, which is based on three pillars: partnering with communities to raise awareness; addressing cultural and language barriers; and overcoming resource barriers to enhance patient accessibility to trial participation. With ECLIPSE, we employed a grassroots strategy to enroll participants, working with community physicians, attending health fairs, and turning to advocacy groups to maintain momentum in trial recruitment and CRC screening. We also designed trial recruitment materials to ensure they resonated with local communities and leveraged rideshare companies and mobile phlebotomy vehicles to make the trial accessible.

ECLIPSE was a learning opportunity to increase diverse enrollment, and we are committed to expanding our efforts to improve diversity in our clinical trials going forward. We have established partnerships with research institutions to understand the opportunities and barriers to the adoption of blood-based screening, especially in communities where CRC screening rates are low. A current study with the University of Chicago will focus on implementing the blood-based CRC screening test in Federally Qualified Health Centers where patients are traditionally underserved. Another partnership with The Ohio State University will study uptake and adherence in rural Appalachia by sending a phlebotomist to collect blood samples for CRC screening alongside a mobile mammography van.

## Driving Adoption, Guideline Inclusion and Reimbursement

We provide fast, accurate testing solutions to enable physicians to make better treatment decisions for patients. Our products have achieved widespread clinical adoption in the U.S., and we are currently expanding our global footprint through partnerships in China, Japan, and the EU. We made important strides in Japan by establishing national reimbursement for Guardant360 CDx and subsequent commercial launch. We also launched Guardant360 for research use in China and exited the year with a healthy pipeline of partnerships. We work with both private and public payers to establish coverage and reimbursement for our tests, which we support by investing in clinical evidence to establish expanded indications for use. To further facilitate reimbursement and global market access to our tests, we are pursuing FDA and other regulatory agencies' approval for our tests and are advocating for inclusion in treatment guidelines. These achievements represent not only Guardant's operational excellence but also the strength of our patient-centric focus and our integration of R&D, policy, and commercialization approaches throughout our product portfolio.

As a market leader in testing to inform therapy selection, we have developed strong relationships across the oncology landscape. Our FDA-approved Guardant360® CDx test provides comprehensive genomic results from a simple blood draw in seven days. This helps oncologists move beyond the limitations of tissue biopsies to rapidly obtain clinically relevant information to match patients to the optimal personalized treatment quickly. Since being introduced as a laboratory developed test (LDT), Guardant360® CDx has become widely accepted for blood-based comprehensive genomic profiling and is supported by more than 500 peer-reviewed publications. The test has been trusted by more than 15,000 oncologists, with more than 700,000 tests performed to date, and is broadly covered by Medicare and many private payers, representing over 300 million covered lives.

*At its core, keeping patients at the center of the mission means recognizing the physical, emotional and financial challenges they face. Every interaction matters, from the first consultation to the final bill. Healthcare businesses should constantly refine both their care delivery and their business practices to ensure that navigating the system is as seamless as possible.*

**- Helmy Eltoukhy, Guardant Health**

## Biopharma Partnerships

Our relationships with our biopharma partners have provided rigorous clinical validation of our technology. Our tests are used by biopharma companies for a range of applications, including identifying target patient populations to accelerate clinical study enrollment, companion diagnostic development, and post-approval commercialization. In Biopharma, we continued our strong expansion and ended the year with over 170 cumulative partnerships and are committed to providing them with best-in-class services to expedite their drug development, regulatory submission, and commercial goals.

We have also invested in public-private partnerships with leading oncology institutions and in-country laboratory testing to help accelerate adoption and reimbursement in emerging global markets. These include our partnerships with the Vall d'Hebron Institute of Oncology in Spain and the Royal Marsden NHS Foundation Trust in the UK. We are using these strategic relationships with European cancer centers and research organizations to further drive global commercialization of our products.



**The ROYAL MARSDEN**  
NHS Foundation Trust

Other partnerships/collaborations include:



## Guardant Access Program

The Guardant Access program provides support to providers and patients to eliminate unexpected bills and confusing paperwork. The program manages the entire billing process for patients and is designed to limit out-of-pocket expenses for Comprehensive Genomic Profiling. The program also provides financial assistance to eligible patients and notifies them if their out-of-pocket expense for our tests is expected to exceed \$100. The Guardant Access Program ultimately allows us to further deliver against our mission of helping every person live a life free from cancer by advancing patient access to our tests.

## Public Affairs

Our participation in the public policy process is focused on broadening patient access to precision diagnostics across the cancer care continuum. We engage in industrywide coalitions and support campaigns in various jurisdictions to advocate for and assist in the implementation of legislation and regulations to make innovative cancer diagnostics widely accessible.

Some of our recent initiatives include:

- Leading a coalition of stakeholders in a campaign to support additional federal funding for the United States of Preventive Services Task Force (USPSTF) and timely review of USPSTF colorectal cancer screening guidelines.

- Successfully advocating for Centers of Medicare and Medicaid Services (CMS) to eliminate cost-sharing for a follow-up colonoscopy after a positive result from a blood-based screening test.
- Supporting American Cancer Society Cancer Action Network initiative to enact biomarker legislation across multiple states by providing state-specific coverage data on Guardant360 and Guardant Reveal.
- Working with our trade associations to advocate to Congress and CMS for reforms to prior authorization and Medicare Advantage to improve patient access to and reimbursement for cancer diagnostics.
- Partnering with leading biopharma companies to facilitate a series of roundtables in European Union member countries to accelerate policy development for multi-cancer early detection tests.

We continue to grow relationships with cancer advocacy groups worldwide and currently participate in over 50 such coalitions.



# PRODUCT QUALITY & SAFETY

Our mission to conquer cancer with data is grounded in our commitment to deliver safe and effective products and services for patients, clinicians, biopharmaceutical partners, and other stakeholders. We uphold rigorous quality policies and procedures in accordance with applicable regulations. We strive to move with urgency without compromising on quality because in our work, every moment counts.

## Oversight

Our Senior Vice President, Regulatory & Quality is responsible for implementing and maintaining our Quality Management System (QMS) and procedures across our global operations. We also have a team of dedicated and highly qualified medical professionals and pathologists to provide input on the overall safety, risk, and benefits of our products.

## Quality Management System

Our QMS is designed to ensure we deliver reliable, high-quality precision oncology products that improve clinical outcomes, lower healthcare costs, and enable better biopharmaceutical development. We perform our tests in our clinical laboratories that we own and operate. We believe our Redwood City, California facility was the first comprehensive liquid biopsy laboratory to be certified pursuant to the Clinical Laboratory Improvement Amendments of 1988, or CLIA, accredited by the College of American Pathologists, or CAP, and permitted by the New York State Department of Health. This laboratory is licensed in California, Florida, Maryland, Pennsylvania, Rhode Island and New York. As a CLIA-certified, “high complexity” laboratory, we are required to validate the accuracy, precision, specificity, and sensitivity of our Laboratory Developed Tests (LDTs) for clinical testing. In order to maintain such accreditation, we are subject to survey for compliance with CAP standards every two years. In addition, our appropriately accredited laboratories are subject to biennial inspections to assess compliance with CLIA standards.

Our Redwood City facility is also certified to the ISO 13485:2016 standard for medical device quality management systems and participates in the FDA’s Medical Device Single Audit Program (MDSAP), which allows a single regulatory audit to satisfy multiple international regulatory requirements. Our ISO 14971 compliant Risk Management Process enables us to continuously identify and mitigate risks related to our medical devices. In preparation for wider commercialization in the European Union (EU), we obtained IVDR CE Marking of our Guardant360 CDX test and blood collection kit. We have also achieved ISO 15189 accreditation, a globally recognized assessment of requirements for quality and competence in medical laboratories.

## Product Testing and Performance Monitoring

We assess the safety of our tests throughout their lifecycle and across each stage of the testing process, including sample collection, laboratory processing, analysis, and reporting. Our proprietary diagnostic methods include robust semi-automated workflows designed for high throughput sample testing, which allows for the rapid scaling of testing volume without impacting performance metrics. All major processing steps incorporate quality control measures to ensure consistent and reproducible results. We have implemented procedures to investigate and respond to potential deficiencies or defects in the design and manufacture of our tests, including, but not limited to, policies for corrective action and removal. To date, we have not had any product recalls nor been subject to enforcement actions by the FDA or other regulatory organizations for issues regarding product safety.

## Employee Training

All employees working within our QMS are required to comply with our Training and Qualification standard operating procedure, which outlines training requirements for new and existing employees covering our Quality Management System, Quality Policy, Quality Manual, and other relevant topics. We provide basic safety training for all on-site employees as part of our QMS and conduct annual Good Clinical Practice (GCP) training.

## Quality Culture

Guardant fosters a strong quality culture that integrates continuous improvement, employee engagement, and risk management into a unified approach. Employees at all levels are empowered to identify opportunities for improvement and to proactively enhance the quality of products and services. This culture of learning and growth emphasizes forward-looking, proactive measures rather than static compliance. Guardant Health also has an annual Quality Week, a focused timeframe of in-person and virtual sessions to raise awareness of product quality and safety and provide additional trainings to employees. By encouraging employees to take ownership and continuously refine processes, Guardant strengthens our organizational resilience.

## Clinical Trial Safety

We assess our products for safety in both patient and clinical settings. We have invested in more than 60 clinical studies to demonstrate that our non-invasive blood testing is in line with standard of care tissue testing. We also have developed relationships with over 60 biopharmaceutical customers that have provided rigorous clinical validation of our technology. We perform clinical trials in accordance with recognized standards and guidelines, including FDA requirements, ISO 13485 and 20916 standards, and Good Clinical Practice (GCP). GCP is an international ethical and scientific quality standard provided by the International Council on Harmonization for designing, conducting, recording, and reporting trials that involve the participation of human subjects. Compliance with this standard provides public assurance that the rights, safety, and well-being of trial subjects are protected and that the clinical trial data are credible.

Our clinical and nonclinical studies do not involve the use of animals. Currently, we have no plans to conduct animal testing, and any use of animal testing in future studies would be limited to where legally required and would be conducted in line with best practice standards.



# SUPPLY CHAIN MANAGEMENT

Strong partnerships with our suppliers are essential to building a responsible, resilient supply chain so that our patients and providers can continue to act decisively in the fight against cancer.

We evaluate potential suppliers to determine if they are capable of supplying and servicing the equipment and materials necessary for our laboratory operations, including sequencers and various associated reagents, and meet our expectations for quality and integrity. We are proud to partner with industry leaders. Each of our top suppliers, collectively representing around 90% of our annual procurement spend, has achieved certification to the ISO 13485 quality management system standard. Our suppliers are assessed using a risk-based system to ensure that we closely oversee our suppliers (and the materials we receive from them) that have a critical impact on the quality of our products. We have a process to annually evaluate our key suppliers to provide us with confidence in their ability to produce consistent and quality instrumentation, reagents and other materials.

We source various laboratory instruments and materials from a limited number of qualified suppliers, including sole suppliers in some cases. To mitigate risk, we employ a multi-month, multi-lot safety stock strategy to ensure an uninterrupted supply of reagents and materials to our laboratories. In the event that a latent defect is identified, the lot of material in use is expected to be timely quarantined and changed for a new lot that has been previously qualified and released for use. We also mitigate potential supply chain disruptions by enacting long-term supply agreements with our most critical vendors. For example, we secured a supply agreement with one vendor through 2033 to provide products and services for our research and clinical activities. We also have quality agreements in place with our most critical vendors to define and uphold our quality expectations.



## Traceability

Guardant has implemented a range of systems and processes to maintain the traceability of our products for sample tracking and quality control purposes. Upon receipt at a Guardant facility, all raw materials are inspected, physically and electronically tagged for product identification, including part numbers, lot numbers, and expiration dates. Our ERP system is used to manage traceability from receipt to the point-of-use.

## Supplier Code of Conduct

We recently implemented a [Supplier Code of Conduct](#) that articulates Guardant Health's expectations that our suppliers operate in accordance with high ethical standards with respect to issues such as human rights, safety, and environmental sustainability. Our Supplier Code of Conduct is communicated to new suppliers during the supplier onboarding process and is posted on our corporate website.

## Transportation and Distribution Optimization

Over the past year, we began implementing an initiative to optimize our Blood Collection Kit (BCK) distribution by switching to Contract Manufacturing Organization partners on both coasts of the U.S. Previously we serviced all of the country and many international locations with BCK shipments from one coast. This new initiative allows us to achieve shorter freight distances for a large percentage of our BCKs, which helps reduce costs, decrease risk of transportation disruptions, and decrease greenhouse gas emissions associated with our product transportation and distribution.

We are collaborating with our largest direct materials supplier to optimize temperature-stable reagent shipments for their latest product platform, eliminating the need for dry ice and foam-insulated boxes. These changes significantly reduce waste and lower shipping-related emissions. We are also piloting a Temperature Controlled Vehicle with our largest direct materials supplier which uses a truck with  $-20^{\circ}\text{C}$ ,  $+4^{\circ}\text{C}$ , and ambient compartments for non-temperature stable products. This also eliminates the need for

insulated shipping boxes, dry ice, and gel packs. Upon delivery to Guardant Health, the products are placed directly into the appropriate storage conditions. To support this transition, we are working closely with the supplier to refine logistics processes. We are also making strides to reduce the volume of packaging needed for our Blood Collection Kits by developing kits which utilize less plastic and cardboard.

## Supplier Diversity

We are currently making improvements to our systems to allow for more accurate and thorough tracking of our spend with suppliers who self-identify as meeting a variety of diverse supplier criteria, such as small, veteran-owned, minority-owned, and women-owned businesses. In 2024, approximately 12% of our total U.S. supplier spend was with suppliers that self-identified as diverse.



# OUR PEOPLE & CULTURE

At Guardant Health, we're immensely proud of our resolute commitment to curing cancer. We are passionate about and guided by our core value of putting the patient first. Our exceptional culture, driven by our enduring values and fueled by science, passion, and an unwavering commitment to our employees and communities, continues to foster innovation and progress to make a significant, positive impact on patients and society as a whole.



## Put the Patient First.

Because every decision we make impacts patients, we must listen attentively, empathize deeply, advocate for their well-being, and ensure every action is focused on improving the patient experience.



## Blaze a Trail.

We are solution-oriented, fearless in tackling challenges, innovate in all aspects of our work, challenge assumptions to unlock opportunities, and dare to take risks.

## Our Core Values

## Be Stronger Together.

We care for each other, treat each other with respect, assume positive intent, constructively challenge to leave the work and each other better, recognize and celebrate each other's contributions, and hold ourselves accountable.



## Make Every Moment Matter.

We move fast and are decisive, seek simplicity, coordinate efforts to avoid wasting time, deliver with excellence, and prioritize by saying 'yes' to the right things.



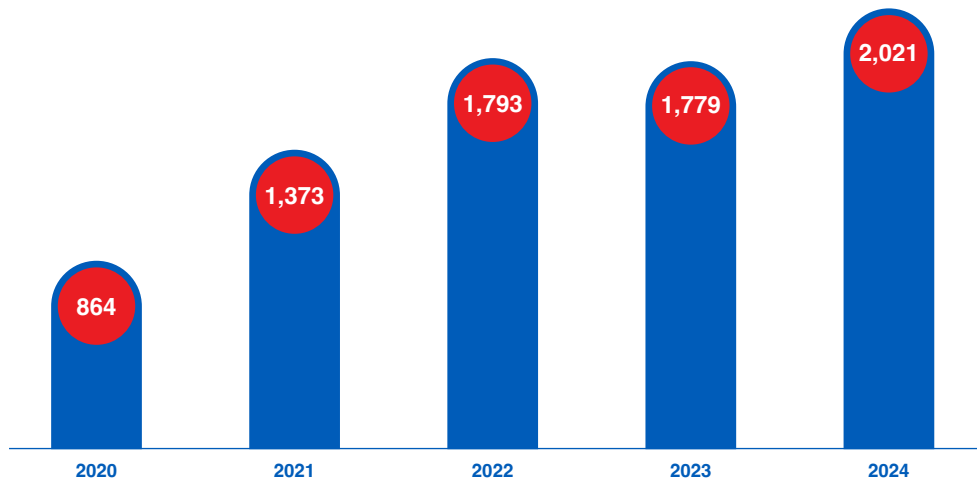


## Talent Attraction and Recruiting

We believe that we can accelerate our patient centric vision with a talented and engaged workforce. We strive to recruit, hire, and retain a diverse team of people who align with our values. In addition, by creating meaningful work and development opportunities for our employees, Guardant enables employees to do their best work as we serve our patients and customers together.

As of December 31, 2024, we had 2,021 employees, 1,999 of which are full-time employees and approximately 1,849 of which are in the U.S., with the remainder in Asia, Europe and Canada.

### Employee Headcount



As we innovate and push scientific boundaries to achieve our mission to conquer cancer with data, we seek talented minds from across the biopharmaceutical and technology landscape, including experts in bioinformatics, engineering, medical affairs, commercial strategy, and IT. To identify top-notch talent, we leverage internal networks and a variety of external resources, such as professional organizations, academic institutions, career sites, job fairs, and industry conferences.

## Our Approach to Talent Identification and Evaluation

We are committed to fostering a fair, inclusive, and high-quality hiring process. Our approach to identifying and evaluating talent for open roles includes:

- Providing hiring managers with timely, structured feedback on candidates to support informed decision-making
- Engaging cross-functional interviewers to ensure alignment with our core values and to promote culture add, not just culture fit
- Upholding our equal opportunity employment policy at every stage of the hiring process
- Regularly reviewing and refining our interview practices to enhance consistency, fairness, and effectiveness
- Offering unconscious bias training to hiring managers to support equitable and inclusive evaluations

## Employee Engagement and Performance Management

As we grow larger and more complex, we understand the importance of listening to employees and acting quickly on what we hear. In the past year, we started a process of continual listening through focus groups comprised of employees across the organization, and we periodically solicit feedback at the individual team level to provide us with even more specific insights. We also increased the frequency of our internal employee survey process from once to twice yearly. During our June 2024 and December 2024 employee surveys, our response rate was approximately 79%, consistent with response rates from prior years. Survey results have influenced the design of many of our employee offerings, as well as a series of interrelated action plans designed to improve the employee experience.

Our unique Guardant Health Engagement Metric (GHEM) score, which is an average of internally tracked employee experience metrics, combines six questions to capture employee sentiment around areas such as alignment with company purpose and growth plans, likelihood to recommend Guardant as a place to work, satisfaction with leadership and team dynamics, and confidence in Guardant's future. Our GHEM score increased by two points to 75 in June 2024 compared to 73 in September 2023, and then to 76 in December 2024. Additionally, in 2024 we introduced an industry-benchmarked engagement index, the Glint Standard Engagement Index, to better understand how our employee experience compares to peer organizations. Our Glint Standard Engagement Index remained at 74 across both survey periods in 2024 (June and December).

Our employee performance management processes are designed to align individual efforts with Guardant's business goals, drive results, and motivate high performance across the organization. We encourage employees to take ownership of their growth by setting contribution and development goals that connect their day-to-day impact with team and company priorities. Acting on employee input, in 2024, we revamped our performance management process to be more relevant, efficient, and transparent. We introduced an enhanced performance management approach that included a process for ongoing goal setting and feedback throughout the year to improve communication, support development, and help employees adapt to evolving business needs. To correspond with this new cadence, we initiated a shift from more generic performance labels to contribution summaries that reflect individual impact. Additionally, we launched formal performance calibrations and adjusted the timing of our merit salary increase, bonus, and equity awards determination process to help managers make better decisions and align total compensation with performance.

Along with overall pay adjustments to keep pace with the market, we recently harmonized our internal role structure and established clearer career paths for individual contributors and people managers. This effort included modifying bonus targets and equity guidelines to help employees better understand expectations of their current role and roles they aspire to have, while providing clarity about how their roles impact the success of Guardant as a whole and their potential opportunities at the company.

We also enhanced how we celebrate employee achievements, both in the short and long term. In this spirit, we established a new series of meetings called Mission Milestones, which celebrate the teams and individuals behind key initiatives and provide an ongoing touchpoint for group successes. These sessions allow employees across the company to ask questions, learn from their colleagues' experience, and offer positive feedback. Monthly socials are another way we celebrate our people, building camaraderie and strengthening our culture.



## Learning and Development

Guardant Health University (GHU) empowers employees, leaders, and teams through practical, flexible learning experiences—whether they have 3 days, 3 hours, or just 3 minutes of time to commit to learning. We use integrated technologies—including our learning management system (LMS), video platforms, and content libraries—to deliver scalable, personalized learning that tracks progress, awards certificates, and supports continuous development. Our programs are designed to meet the diverse needs of Guardant’s global workforce, offering virtual, on-demand, and leader-led learning across a wide range of topics. Courses support both current role performance and future growth. GHU learning is accessible worldwide, with region-specific content and virtual sessions optimized for multiple time zones, ensuring all employees can participate—wherever they are located.

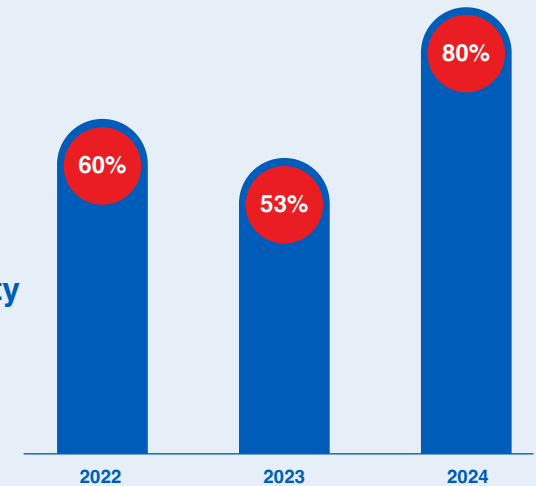
Our GHU program was revamped over the past year to strengthen career development and place a sharper focus on employee skills. Responding to feedback that our learning and development offerings were too generalized in some cases, we identified the top mindsets and capabilities necessary for success and honed our curriculum to better support employees and serve our business strategy. Our revamped approach provides targeted career paths tailored to employee growth, built around topics like decision-making, communication, and how to become an effective manager.

GHU is further supplemented by other on-demand resources like LinkedIn Learning with facilitated sessions that allow employees to strengthen relationships by learning in virtual group settings. We tracked a 72% increase in the percentage of employees engaging in at least one learning event in 2024 compared to 2023, and a 300% year-over-year increase in employees attending a facilitated session with peers. Feedback has been positive, with 93% of employees saying they feel confident they can apply their learning, and 94% of employees agreeing that the learning opportunity was relevant to the challenges they face in their roles.

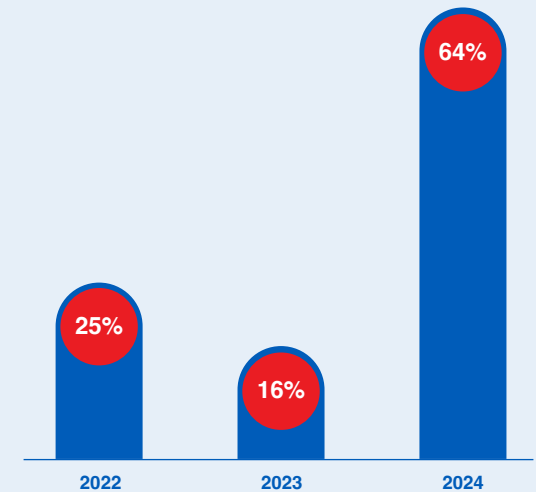
Overall in 2024, approximately 80% of our workforce participated in learning and development activities. Additionally, our People Analytics team conducted a correlation analysis and found that managers whose entire teams engaged in at least one learning activity had higher employee engagement scores across several key questions and indices.

### Percent of employees engaged in at least one learning activity through Guardant Health University

(asynchronous or facilitated course)



### Percent of employees engaged in at least one facilitated course through Guardant Health University



## Compensation and Benefits

We are committed to attracting, retaining and recognizing our employees who make it possible to deliver on our strategy. To that end, we offer competitive compensation, generous benefits, and a mission-driven environment that allows employees to thrive. We regularly evaluate our compensation and benefits programs and utilize industry benchmarking to ensure they are competitive compared to companies in our industry. We also review our practices to ensure they are fair and inclusive across our workforce.

We offer a total rewards package that includes market-competitive fixed and variable pay, broad-based equity grants and bonuses, and access to comprehensive benefits.

While specific benefits vary by country, our generous U.S. benefits program includes the following which are generally available to all U.S. employees working at least 20 hours per week:

### Comprehensive Health Benefits

- Medical Insurance including Telehealth
- Dental Insurance
- Vision Insurance
- Health Savings Account (HSA)
- Fertility and Family Formation Assistance

### Mental & Physical Wellness

- Mental Health Support Resources (Therapy & Coaching)
- Wellness Reimbursement
- Onsite Fitness Facilities

### Income Protection & Life Coverage

- Life Insurance
- Disability Coverage
- Emergency Hardship Fund

### Time Off & Leave Programs

- Paid Time Off including Paid Family Leave
- Sabbatical Program

### Remote Work Enablement

- Cellphone & Internet Reimbursement
- Home Office Reimbursement

### Financial & Retirement Planning

- 401(k) Retirement Savings Plan with Company Matching Contributions
- Employee Stock Purchase Plan
- Tuition Reimbursement

We subsidize the majority of the costs for our employee benefit programs, including robust health, life, and disability insurance coverage. In addition, U.S. employees have access to a 401(k) retirement savings plan with a competitive employer match, work and wellbeing allowances, as well as supportive perks for mental health support, family formation, and primary care/telehealth.

Eligible employees may participate in our Employee Stock Purchase Plan (ESPP), which allows employees to purchase shares of the company's common stock at a price equal to 85% of the fair market value on the first or last day of the six-month offering period, whichever is lower.

In addition to our comprehensive learning and development offerings outlined above, our Tuition Reimbursement Policy supports the professional growth and development of our U.S. employees by providing financial assistance for educational courses and programs up to a maximum of \$5,250 per calendar year for approved undergraduate or certificate level courses, and a maximum of \$7,500 per calendar year for approved graduate level courses. The Tuition Reimbursement Policy is designed to provide eligible employees the opportunity to pursue additional education in courses that will help them excel in their current position and prepare for their next potential role.

To support work-life balance and personal wellbeing, we offer generous paid time off including paid medical and parental leave in the U.S. We reward our longer-tenured employees with access to four weeks of paid Sabbatical after every five years of service. More than 200 employees have taken advantage of the program since inception in July 2022, exploring places such as Disney World, Kenya, and Thailand.

We've partnered with forward-thinking providers to enhance our employee wellbeing offerings. Through Modern Health, employees can access therapy and coaching services, as well as an Employee Assistance Program (EAP). We also partner with Carrot Fertility to support U.S. employees on their fertility and family-forming journeys. In addition, U.S. employees receive a quarterly "Be Well" allowance, which can be used toward a wide range of wellness-related expenses, such as fitness apps, equipment, or classes.

Guardant stands by employees during difficult times, too. Alongside our existing leave policies, we offer a Supplemental Hardship Award program to assist in recovery from an unforeseen catastrophic event. In the U.S., the program offers \$3,500 to assist with disaster recovery expenses. In the past year, 16 employees requested and received funding for costs related to natural disasters such as hurricanes and floods. Last year, we also expanded our support for families in the unfortunate event of an employee's death. For example, in the U.S., in addition to providing a group life insurance benefit of two times the employee's salary, we provide an employee's family with three months of additional pay, a one-year extension of healthcare and EAP counseling/therapy benefits, career support services for the surviving spouse/partner, and a \$50,000 scholarship fund for each child, or an equivalent corporate donation to a charity of the family's choice if there are no children. We also offer internal support services for the deceased employee's coworkers.

## A Culture of Inclusion and Belonging

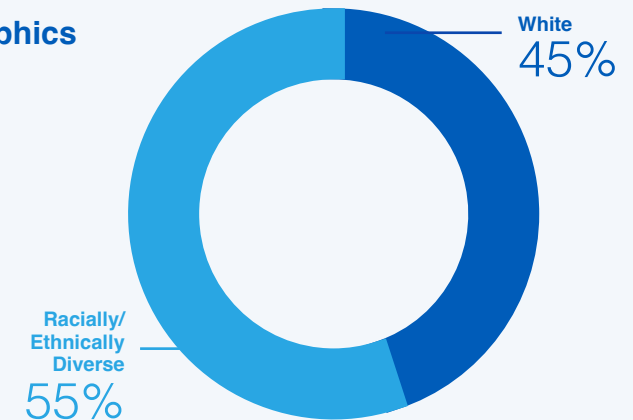
Inclusivity and belonging are in our DNA. We strive to build a workforce that reflects the patients and communities we serve. We know we're part of something bigger than ourselves, and we want to create an environment where employees feel included, respected, and supported in contributing to our mission. We believe that by welcoming and embracing all our unique ideas, perspectives, and experiences, not only do we deliver better outcomes for our patients and their loved ones, we also enjoy meaningful career experiences.

We are proud to employ a diverse workforce that, as of December 31, 2024, was 55% racially/ethnically diverse and 54% female. For leadership positions across the company, which is defined as director level and above, 32% self-identified as racially/ethnically diverse and 40% self-identified as women. As of December 31, 2024, women held 30% of the director seats on our Board.

### Workforce Demographics

Male 46%

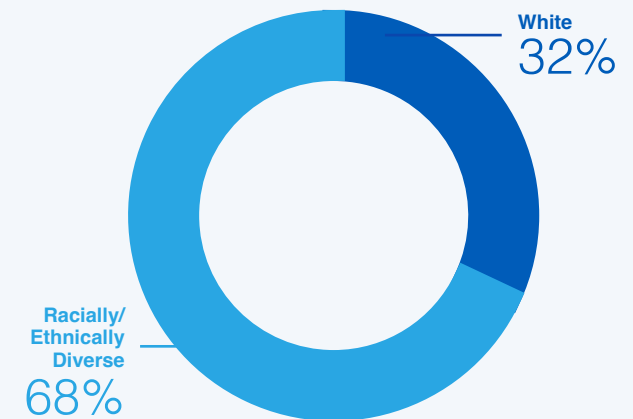
Female 54%



### Leadership

Male 60%

Female 40%



## Workforce Demographics (U.S.)

	2024	2023	2022
American Indian or Alaska Native	0.3%	0.4%	0.5%
Asian	35.8%	39.5%	39.4%
Black or African American	3.7%	3.4%	4.0%
Hispanic or Latino	10.5%	10.5%	9.2%
Native Hawaiian or Other Pacific Islander	1.0%	1.1%	1.1%
White	42.8%	39.3%	39.9%
Two or More Races	3.4%	3.1%	3.3%
Did not answer	2.4%	2.6%	2.7%

Data as of December 31, 2024, 2023, and 2022 based on employees who have self-identified their race and ethnicity. Totals may not add up to 100% due to rounding.

## Diversity Network Alliance (DNA) Groups

Our DNA Groups are Guardant's version of employee resource groups and play a vital role in bringing our "Be Stronger Together" value to life, helping us create a workplace where everyone feels included and comfortable being their authentic self. Our DNA Groups are open to all—whether an employee identifies with the group or wants to show support as an ally. DNA Groups offer a space to connect, learn, and grow together through shared experiences, community events, education, and giving back to the communities where we live and work. We believe that when we embrace our unique perspectives, we become a stronger, more innovative company.



## Anti-Harassment

We appreciate one another's differences and strengths and we are proud to be an equal opportunity employer. We are committed to providing fair treatment to all employees and providing a workplace free of discrimination and sexual harassment. All employees are required to receive interactive training on preventing sexual harassment and abusive conduct upon assuming their position and at least once every two years thereafter.

We prohibit any discrimination and harassment protected by applicable law. We maintain a strict policy prohibiting unlawful harassment and will not tolerate such behavior whether committed by managers, supervisors, non-supervisory personnel, co-workers, or non-employees. In addition, we prohibit harassment by customers, vendors, independent contractors, interns, visitors, volunteers, and others who employees come in contact with while working for Guardant.

We encourage employees to promptly report any incidents of harassment so that corrective action may be taken. We prohibit any form of retaliation against employees for having reported harassment or discrimination or having assisted a co-worker for reporting discrimination. Any incidents of harassment should be directed to our People Team, which is responsible for investigating harassment complaints thoroughly and promptly. The People Team partners with the Legal team and at times, external investigators, to conduct investigations in as confidential a manner as possible consistent with a full, fair, and proper process.

## Employee Health and Safety

We are committed to providing a safe and secure work environment and maintaining environmental, health and safety policies that promote the health and safety of our employees and patients. We mandate continual health and safety training programs, and we have a robust employee wellness program that recognizes and supports the importance of personal health, and work-life balance. We have established standard operating procedures covering our clinical laboratory training program, laboratory biosafety (including bloodborne pathogen, aerosol transmissible disease, and chemical hygiene management), medical and hazardous waste management, and emergency action and recovery, among other procedures.

## Employee Volunteering

We care and give back to the communities where we live and work, and employees show their commitment by volunteering time and money to support patients and local communities. For example, in the first quarter of 2025, employees donated over 2,750 in-kind items and kits through partner organizations. This reflects an acceleration of Guardant's volunteer efforts through our first-ever monthly employee volunteer program, launched in January 2025 at our Palo Alto Headquarters. The initiative was inspired by a popular 2024 event where 50 volunteers constructed 200 stuffed animals as holiday gifts for children with cancer. Employee enthusiasm was so overwhelming that a monthly program was quickly developed to give back to local communities through a rotating array of partners. In January 2025, participants in a Martin Luther King, Jr. Day of Service event built 1,700 hygiene kits for the Bay Area homeless community with local non-profit, WeHOPE. In February 2025, volunteers assembled 1,000 learning kits for Girls in Science, and a March 2025 event with Beads of Courage created 50 art cards for young cancer patients. In the first three months of 2025, the program engaged over 100 employees passionate about giving back to the local community.

Guardant's executive leadership and Medical Affairs teams have also collaborated with organizations such as Susan G. Komen and Man Up to Cancer to pack backpacks with supplies and personalized letters of hope and encouragement for individuals at different stages of their cancer and chemotherapy journeys. In October 2024, in conjunction with Breast Cancer Awareness Month, Guardant partnered with Susan G. Komen in a giveback event. This event brought together Guardant's Medical Affairs team, the leadership of Susan G. Komen, and patient advocates in an afternoon of education and, more importantly, creating 1,000 recovery kits for the Dallas 3-day walk to end breast cancer. Guardant employees also wrote personal notes of inspiration on pink ribbons to include in the kits to share feelings of hope and connection.

We focus on supporting veterans through our partnership with the Dream Foundation, an organization that grants wishes to adult patients nearing the end of their lives due to cancer or other terminal illnesses. Through the Dream Foundation's veterans wing, members of our Guardant Veterans DNA group travel to deliver Dreams in person to veterans.

Driven by our commitment to our communities, we continue to develop new ways for employees to provide their support. Looking ahead, later in 2025 we plan to launch Benevity, a platform that strengthens and simplifies employee volunteerism and charitable giving.

## Corporate Giving

Our Public Affairs and Patient Advocacy teams are engaged across multiple jurisdictions and communities within the United States, shaping policy that puts patients first by broadening their access to testing and treatment. Working through coalitions like the American Cancer Society Cancer Action Network, our teams help to educate policy makers and their constituencies, share patient stories and other real-world examples, and utilize state-specific coverage. These efforts have led to the successful passage and implementation of legislation at the state level and in Washington, D.C., where our team engages with regulators, Congress, and the federal administration.

During 2024, we donated over \$880,000 to 501(c)(3) entities, to support or sponsor cancer-focused advocacy efforts, fundraisers, and events. Our contributions helped support areas such as cancer research, screening awareness, patient support, community wellness, and STEM education. For example, we are a Corporate Partner of Life Science Cares, a collaborative effort engaging companies in the life science space to support communities of people experiencing food and housing insecurity.

In 2024, we expanded our partnership footprint beyond the cancer community. We launched a multi-phased and multi-year collaboration with the First Ladies Health Initiative, a faith-based organization with a national reach of over 430,000 church members, to advance colorectal cancer awareness, knowledge, and screening in minority communities. This work was recognized by President Biden's White House Cancer Moonshot Initiative. We continue to identify other important causes to support.

For the fourth year in a row, we were proud to support colorectal cancer awareness at the United in Blue rally, sponsored by the Fight Colorectal Cancer organization. Held on the National Mall in Washington, D.C., Guardant employees helped plant an installation of 29,400 flags, representing the number of people under age 50 projected to be diagnosed with colorectal cancer in 2030.





# CORPORATE GOVERNANCE

Our Board of Directors is committed to promoting the long-term interests of all our stakeholders and recognizes the value and importance of a strong corporate governance structure. Our Co-CEO, Helmy Eltoukhy, serves as our Chairperson of the Board and is supported by a strong lead independent director. We have adopted robust Corporate Governance Guidelines to guide the Board in exercising its duties responsibly. Our Board continually reviews its corporate governance practices and is taking steps to strengthen and enhance those practices in response to stakeholder feedback.

Enhancements made to the company's corporate governance structure over the past several years included:

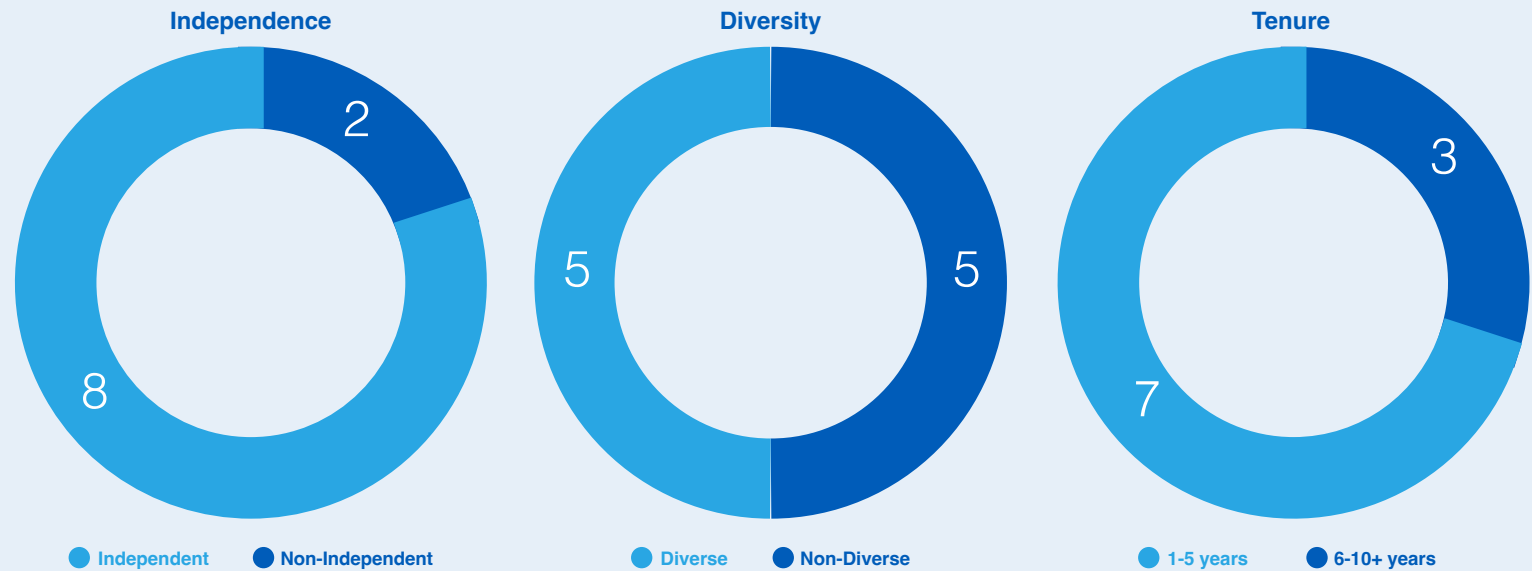
- Amending the Nominating and Corporate Governance Committee's charter to enhance the committee's oversight of (i) corporate social responsibility, including environmental, social and governance (ESG) matters, (ii) ethical compliance, including management's efforts to monitor compliance with the Company's Business Code of Conduct and Ethics, and (iii) information technology and cybersecurity initiatives, particularly those that relate to healthcare regulatory compliance.
- Amending the Code of Conduct to increase the breadth and specificity of standards to be upheld by all directors, officers, and employees of the company, including adding and refining guidelines regarding conflicts of interest, business records, gifts and favors, antitrust practices, political contributions, environmental protection, and personal conduct and social media practices.
- Instituting a process for regular discussion by the Nominating and Corporate Governance Committee of ESG matters
- Included in the annual incentive performance metrics an element tied to employee engagement, representing 5% of the opportunity, since Guardant recognizes that engagement is closely linked to employee satisfaction and retention and thus, ultimately, to operational performance.

We recognize the value of a robust stockholder outreach program. We engage in regular, constructive dialogue with our stockholders on matters relevant to our business, including corporate governance, executive compensation, strategy, ESG issues, and human capital management. We have also engaged with the research teams at proxy advisory firms Institutional Shareholder Services Inc. and Glass Lewis & Co. to hear their feedback regarding our programs. Our dialogue has led to enhancements in our corporate policies and procedures that we believe are in the best interest of the company and our stockholders.

Our Board has established three committees that are entirely composed of independent directors. Please refer to each committee charter below for more information:

We are committed to enhancing the diversity of our Board so that they can exercise sound judgment using a variety of experiences, thoughts, backgrounds, and cultures. Currently, 30% of our directors are female and 40% of our directors self-identify as racially or ethnically diverse.

**Statistics for Directors  
(as of April 29, 2025)**



**Independence**

**80%**

8 of 10 directors are independent



**Gender Diversity**

**30%**

3 of 10 directors are female



**Tenure**

**5.1** years

Average tenure of directors



**Racial / Ethnic Diversity**

**40%**

4 of 10 directors are members of traditionally underrepresented racial/ethnic groups, as defined by current U.S. census racial/ethnic categories

## Business Continuity Planning (BCP) Program

Our Business Continuity Planning program (BCP) is designed to provide assurance to internal and external stakeholders about Guardant's ability to continue key business activities and ensure health and safety in the event of a disruptive incident. Our BCP management systems are aligned with the requirements set forth in ISO 22301 standards and associated guidelines.

We have a Business Continuity Steering Committee (BCSC) to oversee the program and ensure that related policies and objectives are compatible with the strategic direction of the organization. The BCSC includes business management leaders representing functions such as Risk Management, Facilities, IT, Legal, People, Clinical Operations, and Manufacturing and Supply Chain. The BCSC works to integrate BCP program requirements into business processes, periodically test our ability to protect against business interruption, and promote risk awareness across the company. Our BCSC meets on a quarterly basis to discuss scope, objectives, and performance of the program, and our senior management team reviews the BCP program annually. We conduct exercises, simulation events, and provide training to employees to improve our capabilities in executing our BCP program.



# ETHICS & COMPLIANCE

We are committed to conducting our business in accordance with the highest ethical standards and are dedicated to providing a safe, ethical, and secure work environment for all. We expect all our directors, officers, and employees to always conduct themselves with honesty and reflect the values of our organization.

Our Senior Vice President, Legal Affairs & Chief Compliance Officer oversees our compliance program in conjunction with the Nominating and Corporate Governance Committee of the Board of Directors. The Audit Committee also oversees legal and regulatory compliance regarding matters that could significantly affect the company's business or financial statements. The Chief Compliance Officer provides quarterly updates on the compliance program to the executive leadership team and Board of Directors and holds bi-monthly compliance committee meetings with representatives from the oncology and screening divisions.

## Compliance Program

Our *Business Code of Conduct and Ethics* ("the Code") underpins our compliance program and establishes our expectations for honest and ethical conduct for the entire organization. Our written Code of Conduct applies to our directors, officers and employees, including our principal executive officer, principal financial officer, principal accounting officer or controller, or persons performing similar functions. Our compliance program is based on the Office of Inspector General's (OIG) guidance for healthcare compliance, such as the Seven Fundamental Elements of an Effective Compliance Program. We also follow OIG guidance on interactions with healthcare professionals (HCPs) and preventing fraud and abuse. Going forward, we aim to make enhancements to our OIG compliance program and implement a risk governance and monitoring platform.

## Our compliance program is based on OIG published guidance documents



**Compliance Officer and  
Compliance Committee**



**Training**



**Policies & Procedures  
and Code of Business  
Conduct**



**Disciplinary Action**



**Response to Issues  
and Corrective Action**



**Auditing and Monitoring**



**Anonymous Hotline  
and Non-retaliation  
Policy**

## Fair Dealing, Ethical Marketing and Interactions with Healthcare Professionals

We expect our employees to avoid improper behavior and deal fairly with all of our stakeholders, including customers, service providers, suppliers, competitors and other employees. We prohibit our employees from taking unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any other unfair business practice.

As members of the Advanced Medical Technology Association (AdvaMed), we follow and fully comply with the AdvaMed Code of Ethics, which provides guidance on ethical interactions and relationships with U.S. HCPs. We strictly prohibit kickbacks or bribes and fully comply with federal, foreign, and state fraud, abuse, and anti-corruption laws.

One-on-one in-person and virtual interactions with oncologists are critical to driving adoption of our products. We require employees who work with U.S. HCPs to receive regular compliance training that covers unethical practices, including kickbacks and bribes. We also require that our employees promote our products only in accordance with their FDA cleared or approved labels and prohibit any form of off-label promotion. The risk of off-label use lies in the promotion of our laboratory developed tests (LDTs) in the absence of FDA approval. Our employees receive extensive training on the risks of off-label promotion of our LDTs and we regularly review our marketing materials to ensure they are aligned to accurate information about our tests.

## Global Anti-Corruption Policy

Our [Global Anti-Corruption Policy](#) strictly prohibits bribery and other improper payments across our business operations. Guardant Health employees and agents shall not make, offer, request, agree to, or accept anything of value as an inducement or reward for the improper performance of any function or business-related activity when interacting with any employee, agent, or representative of another company or entity. This prohibition applies to all business activities anywhere in the world, whether they involve government officials or involve commercial parties. Violations of our Global Anti-Corruption Policy will not be tolerated and can lead to disciplinary action including termination.

Improper payments prohibited by our Global Anti-Corruption Policy include bribes, kickbacks, excessive gifts, hospitality or entertainment, or any other payment made or offered to obtain an undue business advantage to an employee, representative of any government or political party, or any other third party. These payments should not be confused with reasonable and limited expenditures for gifts, business entertainment and other legitimate activities directly related to the conduct of our business.

As a U.S. company, we comply with the U.S. Foreign Corrupt Practices Act (FCPA), which prohibits a company or its representatives from corruptly making, paying or offering anything of value to any foreign official to persuade that official to help the company obtain or keep business or other benefits. Moreover, we comply with anticorruption laws in other jurisdictions, including the UK Bribery Act of 2010, which prohibits commercial bribery.

To date, we have not experienced any monetary losses as a result of legal proceedings associated with false marketing claims, bribery, or corruption.

## Compliance Training

We have designed our compliance training program to support the expectations laid out by our Code and other compliance policies. We perform annual training sessions for all employees and role-specific refresher trainings on topics such as quality systems, privacy, and fraud. We also help ensure the health and safety of our workplace by training all employees on safe work practices.

## Third Party Due Diligence

We contract with third parties to perform various functions on our behalf, such as data processing services. We require our third parties to safeguard any personal information by contract and perform extensive due diligence in third-party contracting. For example, we require all members of our Physician Education Program to be trained by the compliance team on relevant policies pertaining to interactions with Guardant customers and patients. Our distributors also received training on our internal policies, including mandatory FCPA training.

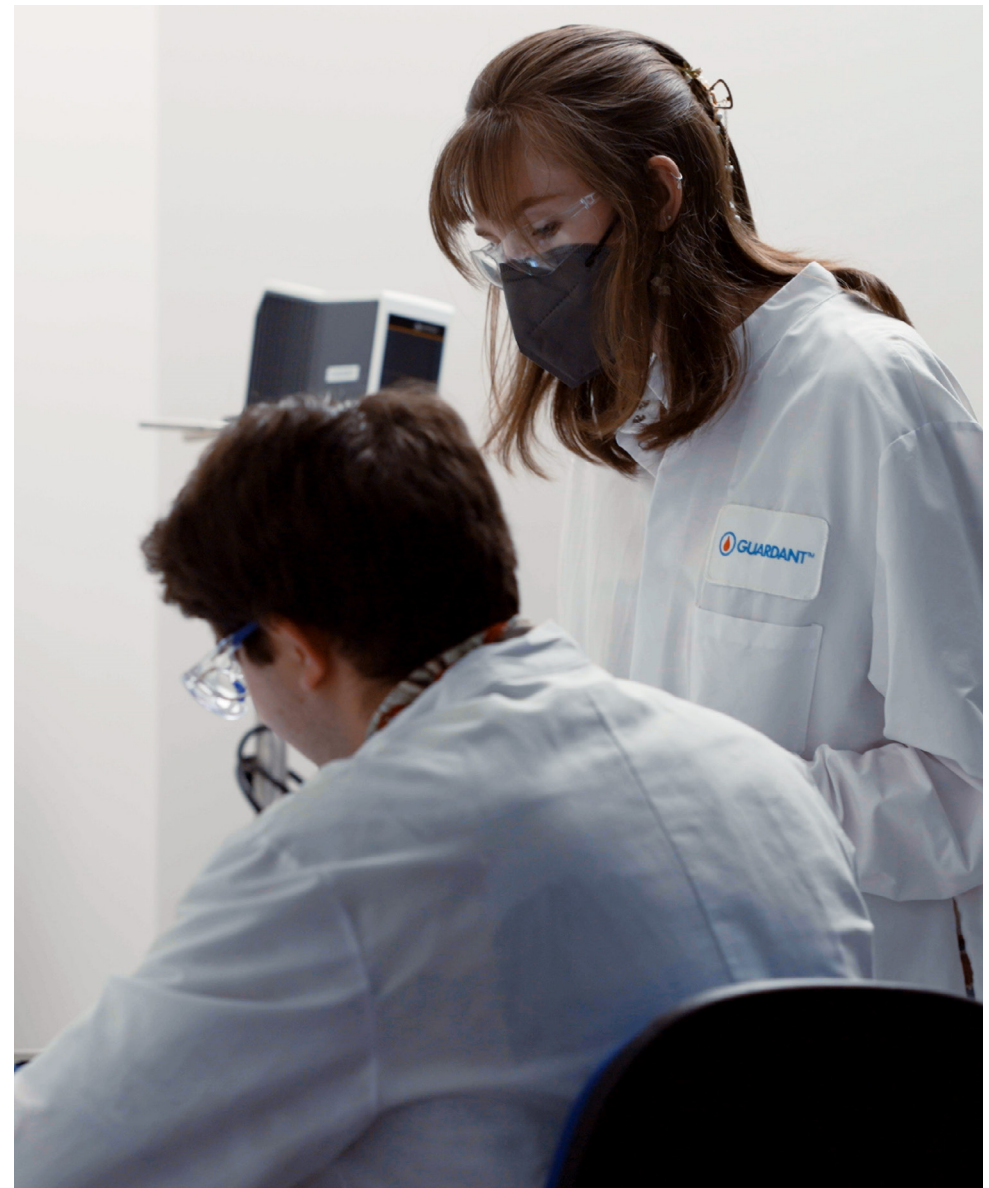
## Reporting Violations of the Code of Conduct and Other Policies

We are committed to fostering an environment where our employees feel comfortable raising potential compliance concerns. We ask that our employees promptly report suspected violations of company policies, laws, regulations, and any other unethical behavior. We have established various mechanisms for employees to anonymously voice their concerns. These include a confidential compliance telephone hotline available 24/7 and a website managed by a third-party vendor.

We take all reports of suspected violations seriously and conduct thorough investigations led by our Chief Legal Officer and other appropriate personnel, who recommend appropriate disciplinary actions. To encourage employees to report any and all violations, we prohibit retaliation for reports made in good faith.

## Lobbying

Our direct expenses related to lobbying are modest and are primarily focused on educating policymakers at the federal and state level on Guardant Health policy priorities. Some members of our Government Affairs team are registered lobbyists, and we file lobbying disclosures with federal and state governments as required. To amplify the reach of our public policy and advocacy efforts, we are also members of industry associations that may conduct lobbying activities, including:



# CYBERSECURITY

At Guardant, we harness important health information to make it actionable for routine clinical use. We are committed to safeguarding the security and privacy of data we collect, including protected health information (PHI), personally identifiable information (PII), financial information, intellectual property, and other personal information. We dedicate significant resources to securely processing, storing, maintaining, and transmitting this critical information so that we can maintain trust with our patients and other stakeholders.

## Oversight

The Nominating and Corporate Governance Committee of our Board of Directors oversees Guardant's cybersecurity program and receives briefings from management on the company's security protocols and risks at least twice per year. These reports generally cover various topics, which may include summaries of recent industry events or notable topics that may influence our cybersecurity risk perspective and security priorities, any actions taken in response to such events or topics, and a review of our top cybersecurity concerns and priorities. Our Chief Information Security Officer, Chief Information Officer, Privacy Officer, and Data Protection Officer manage and oversee cybersecurity and privacy across the company.

## Cybersecurity Risk Management

Cybersecurity risk management is performed by the senior leadership of the cybersecurity team as well as members of our legal and privacy teams where relevant. These individuals are informed about, and monitor the prevention, mitigation, detection and remediation of cybersecurity incidents through their management of, and participation in, our cybersecurity risk management processes, including the operation and testing of our incident response plan.

We depend on information technology and telecommunications systems for significant elements of our operations, including our laboratory information management system, our computational biology system, our knowledge management system, our customer reporting, and our GuardantConnect software platform. We have implemented physical, administrative, and technical safeguards to protect the confidentiality, integrity, and availability of all Guardant data, including patient information. These safeguards include facility and data access control, password protection, encryption, and security monitoring tools and protocols.

We manage and maintain our applications and data utilizing a combination of on-site systems and cloud-based data centers. We utilize external security and infrastructure vendors to manage parts of our data centers. We take reasonable measures to protect sensitive data from unauthorized access, use, modification, or disclosure.

Through our Security Management Process, we have implemented policies and procedures to prevent, detect, contain, and correct information security violations. We have aligned our cybersecurity policies and governance structure to ISO 27001:2022. Our Information Security Policy references the following third-party standards:

- ISO/IEC 27001:2022 – Information security, cybersecurity and privacy protection — Information security management systems
- ISO/IEC 27002:2022 – Information security, cybersecurity and privacy protection — Information security controls
- NIST Special Publication 800-53 Security and Privacy Controls for Federal Information Systems Organizations

In response to the FDA's introduction of new standards for medical devices in 2023, we proactively initiated the development of protocols to ensure compliance with these regulatory requirements. Additionally, we initiated the implementation of the final recommendations for the FDA secure product development framework within our operations. These recommendations include threat modelling and an overarching cyber risk management plan.

We maintain various protections designed to safeguard against cyberattacks, including but not limited to attack surface management, anti-phishing secure email gateways, log monitoring and analysis, cloud security posture management, endpoint detection and response, and network intrusion detection and prevention systems. We also have processes in place to prevent unauthorized access to data processing systems and facilities, including two-factor authentication, tiered approval processes and password complexity.

As a part of the company's Risk Management Process, we conduct routine assessments of the potential risks and vulnerabilities to the company's assets and data. We periodically scan for vulnerabilities, perform penetration testing and engage third parties to assess the effectiveness of our data security practices and compliance with applicable practices and standards. In addition, we maintain a third-party risk register to identify, prioritize and track risks, including those associated with our use of third-party service providers. Our threat intelligence program issues a semi-annual report briefing to inform the security team about relevant cybersecurity events, significant vulnerabilities and vendor-related incidents. We believe our cybersecurity measures are sufficient to reduce identified risks to reasonable levels.

## We continually enhance our processes and strengthen our technology to protect our data

- Refreshing our data privacy and security policies at least annually
- Employing best-practice precautions to safeguard information and protect our patients' data
- Using proactive defense practices against the ever-evolving cyber threat landscape
- Measuring and maturing our cybersecurity capabilities and actively monitoring risks posed by threat actors
- Providing annual company-wide data privacy and security training to all employees

## Managing Personal Information

We take reasonable steps to ensure that the personal information we collect is relevant to its intended use, accurate, complete, and current, and we obtain the minimum amount of information necessary to provide our healthcare services.

We are a covered entity under the Health Insurance Portability and Accountability Act (HIPAA) and comply with its requirements to protect the privacy and security of PHI. As required by HIPAA, we provide individuals with certain rights with respect to their health information and comply with HIPAA's rules surrounding privacy, security, and breach notification. For more information on our approach to privacy, please refer to our [Privacy Policy](#) and [Notice of Privacy Practices Under HIPAA for US Residents](#).

Our Workforce Security and Information Access Management standards are designed to ensure that only employees who are required to work directly with PHI to perform their job functions have access to it. This applies to relevant employees upon hire and covers initial access authorization, modifications to access during employment, and exit procedures to ensure that employees can no longer access PHI after a role change within the company or departure. We conduct periodic internal and third-party compliance audits of our privacy practices, procedures, and data processing systems.

## Incident Response Procedure

Our Security Incident Response Procedure is designed to identify and respond to suspected or known security incidents; mitigate, to the extent practicable, harmful effects of security incidents that are known; and document security incidents and their outcomes including post-mortems to create a cycle of continuous review and improvement. We maintain insurance coverage for certain potential claims, liabilities, and costs relating to security incidents.



## Training

All employees are assigned training for compliance with HIPAA and other privacy laws upon hire. Employees and applicable contractors undergo mandatory privacy and security trainings annually. In 2024, 99% of employees completed these training requirements through a combination of new employee orientation and annual training courses. Our employees are trained on topics such as data sensitivity, privacy requirements, password management, best practices for avoiding social engineering attacks, avoiding malicious software, and their responsibilities for protecting Guardant assets. We are developing data handling training for PHI handlers as well as HIPAA specific training for service and system owners. We raise awareness of cybersecurity with all employees, regardless of their role, during our annual Cybersecurity Awareness Month, which includes training and other voluntary activities. We also issue periodic security reminders to all employees.

## Looking Ahead

Going forward, we aim to strengthen our information security framework to better mitigate risks and safeguard our operations. This includes measures to enhance privileged access management, improve identity governance, expand alerts for threat and vulnerability management, establish detective engineering, formalize our Human Risk Management program, and segment and secure our lab operations. In 2025, we are moving to a video-based training approach to create more engaging training content. In addition, we are adopting a user engagement platform to deploy automated and personalized training to employees. Our overarching goal is to formalize all aspects of our cybersecurity program and embed it across our organization.



# ENVIRONMENTAL SUSTAINABILITY

Our duty to serve our patients well means that we must also act responsibly in our surrounding environment. We are committed to integrating sustainable practices into how we operate. We measure key data and metrics from across our global operations so we can better understand our impact on the environment. We comply with the regulatory standards that apply to our business and continuously seek ways to improve our environmental stewardship.

## Our Facilities

We operate three primary laboratory facilities in the U.S., all located in California. We are working to enhance our laboratory systems by developing products that utilize improved automation techniques. By streamlining laboratory operations with automation, we can minimize manual labor, which in turn reduces the amount of waste, personal protective equipment, and other materials used by our personnel during the product development process.

For example, a significant portion of our plastic waste is derived from pipetting, and we have implemented robotic pipetting to optimize these processes. We have also installed LED lighting and energy-efficient light timers throughout our facilities. At our Palo Alto facility, solar energy panels are installed on the roof to support our electricity needs. We also provide electric vehicle charging stations for our Palo Alto and Redwood City employees. To reduce non-hazardous plastic waste at our facilities, we have introduced biodegradable, compostable materials to replace plastic where possible.



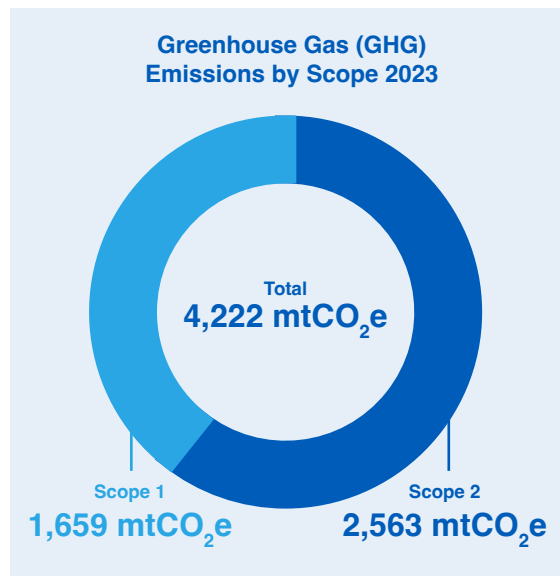
## Environmental Protection

We are committed to managing and operating our business in a manner that protects human health, safety, and the environment. We comply with all environmental protection laws in the jurisdictions in which we operate and have developed procedures to responsibly manage the handling and disposal of medical and hazardous waste. We have contracted with a licensed hazardous waste management company to properly dispose of our hazardous and medical waste from our facilities on a weekly basis. In 2024 and 2023, our operations generated approximately 192,000 pounds and 166,000 pounds, respectively, of hazardous and medical waste, which our third-party partner managed in accordance with all applicable environmental regulations and standards. To date, we have not had any environmental violations or penalties due to our activities.

## Greenhouse Gas Emissions

Understanding our carbon footprint is the first step to evaluating our climate-related impacts. We have been developing and refining measurement processes so we can calculate enterprise-wide greenhouse gas (GHG) emissions, beginning with Scope 1 and Scope 2 GHG emission categories. We have established 2023 as our baseline year for these calculations.

Our initial GHG assessment lays the groundwork for evaluating emission reduction strategies. We recently expanded our calculations into Scope 3 GHG emissions categories, which we hope to disclose more about in our future corporate responsibility reporting.



*Scope 1: Direct release of greenhouse gases from sources owned or controlled by Guardant.*

*Scope 2: Emissions from the generation of electricity, steam, heat, or cooling purchased by Guardant.*



# AWARDS & ACCOLADES



We're honored to be a Great Place to Work-Certified™ company. At Guardant, our culture is our top priority, and we strive every day to put our people and our patients first. Thank you to our mission-driven team who contributed their feedback and helped us achieve this recognition.



For the second year in a row, we're honored to be named one of Computerworld's 2025 Best Places to Work in IT, with Top 10 rankings in both Benefits & Compensation and Retention & Engagement. A huge thank you to our incredible IT team - your passion, expertise, and collaboration are what truly set us apart and make us exceptional!

Our co-CEOs, Helmy Eltoukhy and AmirAli Talasaz, were named to the 2025 TIME100Health list, honoring the top 100 most influential people in global health. TIME's recognition highlighted their leadership in redefining precision oncology and advancing our mission to conquer cancer with data.



We were also recognized as one of Fast Company's Most Innovative Companies in Biotech for 2024.

**MSCI**  
ESG RATINGS



In 2025, Guardant Health received a rating of AA (on a scale of AAA-CCC) in the MSCI ESG Ratings assessment.



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# SUSTAINABILITY ACCOUNTING STANDARDS BOARD (SASB) INDEX

The Sustainability Accounting Standards Board (SASB) is an independent standards-setting organization that promotes the disclosure of relevant sustainability information to meet investor needs. Responsibility for the SASB Standards sits with International Sustainability Standards Board of the IFRS Foundation. Guardant Health Inc is classified

officially by SASB in the Biotechnology & Pharmaceuticals Industry. We have also chosen to add relevant sections from the industry categories of the Medical Equipment and Supplies Sustainability Accounting Standard. The data below covers calendar years 2024, 2023, and 2022.

Topic	Accounting Metrics	Data/Response 2024	Data/Response 2023	Data/Response 2022	SASB Code
Ethical Marketing	Total amount of monetary losses as a result of legal proceedings associated with false marketing claims	0	0	0	HC-BP-270a.1
	Description of code of ethics governing promotion of off-label use of products	<i>Refer to page 29</i>			HC-BP-270a.2
Business Ethics	Total amount of monetary losses as a result of legal proceedings associated with corruption and bribery	0	0	0	HC-BP-510a.1
	Description of code of ethics governing interactions with health care professionals	Our Business Code of Conduct and Ethics underpins our compliance program and establishes our expectations for honest and ethical conduct for the entire organization. We also follow guidance from the U.S. Department of Health and Human Services Office of Inspector General on interactions with healthcare professionals.			HC-BP-510a.2
Product Safety	(1) Number of recalls issued, (2) total units recalled	0	0	0	HC-MS-250a.1

Topic	Accounting Metrics	Data/Response 2024	Data/Response 2023	Data/Response 2022	SASB Code
Product Safety	Products listed in any public medical product safety or adverse event alert database	Reported in the <a href="#">FDA Manufacturer and User Facility Device Experience (MAUDE) database</a>			HC-MS-250a.2
	Number of fatalities associated with products				HC-MS-250a.3
	Number of enforcement actions taken in response to violations of good manufacturing practices (GMP) or equivalent standards, by type	0	0	0	HC-MS-250a.4
Supply Chain Management	Percentage of (1) entity's facilities and (2) Tier 1 suppliers' facilities participating in third-party audit programmes for manufacturing and product quality	<p>(1) We currently perform clinical, research use only, and investigation use only tests in our laboratory located in Redwood City, California. Our Redwood City laboratory is certified pursuant to the Clinical Laboratory Improvement Amendments of 1988, or CLIA, accredited by the College of American Pathologists, or CAP, permitted by the New York State Department of Health, or NYSDOH, and licensed in California and four other states. We also perform research use only tests in our laboratory located in San Diego, California. We have obtained CAP accreditation for our laboratories in Redwood City, California. In order to maintain such accreditation, we are subject to survey for compliance with CAP standards every two years.</p> <p>(2) Each of our top suppliers, collectively representing around 90% of our annual procurement spend, has achieved certification to the ISO 13485 quality management system standard.</p>			HC-MS-430a.1
	Description of efforts to maintain traceability within the distribution chain	Guardant has implemented a range of systems and processes to maintain traceability of our products for sample tracking and quality control purposes. Upon receipt at a Guardant facility, all raw materials are inspected and electronically tagged for product identification, including part numbers, lot numbers, and expiration dates. Our ERP system is used to manage traceability to the point-of-use.			HC-MS-430a.2
	Description of the management of risks associated with the use of critical materials	Our suppliers are assessed using a risk-based system to ensure that we closely oversee our suppliers (and the material we receive from them) that have a critical impact on the quality of our products.			HC-MS-430a.3

## Forward Looking Statements

This report contains forward-looking statements within the meaning of federal securities laws, including statements regarding the potential utilities, values, benefits and advantages of Guardant Health's liquid biopsy tests or assays, which involve risks and uncertainties that could cause the actual results to differ materially from the anticipated results and expectations expressed in these forward-looking statements. These statements are based on current expectations, forecasts and assumptions, and actual outcomes and results could differ materially from these statements due to a number of factors. These and additional risks and uncertainties that could affect Guardant Health's financial and operating results and cause actual results to differ materially from those indicated by the forward-looking statements made in this report, and include those discussed under the captions "Risk Factors" and "Management's Discussion and Analysis of Financial Condition and Results of Operation" and elsewhere in its Annual Report on Form 10-K for the year ended December 31, 2024 and in its other reports filed with or furnished to the Securities and Exchange Commission. The forward-looking statements in this report are based on information available to Guardant Health as of the date hereof, and Guardant Health disclaims any obligation to update any forward-looking statements provided to reflect any change in its expectations or any change in events, conditions, or circumstances on which any such statement is based, except as required by law. These forward-looking statements should not be relied upon as representing Guardant Health's views as of any date subsequent to the date of this report.

The information and opinions contained in this report are provided as of the date of this report and are subject to change without notice. Guardant Health does not undertake to update or revise any such statements. This report represents current Guardant Health policy, practices and intent and is not intended to create legal rights or obligations. This report may contain or incorporate by reference public information not separately reviewed, approved, or endorsed by Guardant Health, and no representation, warranty, or undertaking is made by Guardant Health as to the accuracy, reasonableness, or completeness of such information. Inclusion of information in this report is not an indication that the subject or information is material to Guardant Health's business or operating results.



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