

❖ one medical

Code of Business Conduct



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A Message from our CEO to the One Medical team

Dear Colleagues,

At One Medical, we are on a mission to transform healthcare through our human-centered, technology-powered model. We look to make positive impacts by simultaneously addressing the frustrations and unmet needs of multiple stakeholders. We are guided by our commitment to treating everyone with outstanding C-I-CARE experiences, expressing our DNA values, and demonstrating highest levels of integrity in everything we do.

Our Code of Business Conduct (“Code” or “One Medical Code”) is designed to reflect these important principles, guide us in our work, and serve as a compliance-related resource. We believe our collective success is driven both by what we do and how we do it. In line with our Code, should you become aware of any situation that could be in conflict with the Code or that might violate applicable laws or regulatory requirements, please report it using any of the resources listed in this Code.

By upholding our Code of Conduct, expressing our DNA values, and treating everyone with outstanding C-I-CARE, we can reflect our best and the best of healthcare. Thank you for your personal commitment here, and for all you do every day to transform healthcare.

Sincerely,

Amir Dan Rubin

Chair, CEO, and President
One Medical



Taking ethics and compliance seriously

The One Medical Code of Business Conduct (“Code”) is a set of guiding principles and a commitment to put our values into action, including our commitment to comply with state and federal law. It guides us to act ethically and with integrity in all aspects of our business. More importantly, it helps us to preserve the trust our members have placed in us with their most valuable asset... their health.

As part of the One Medical team, you should be aware of the legal and professional obligations related to your role. A fundamental part of being a member of the One Medical team is respecting and following the Code, our policies, and obligations.

This Code is not intended to cover all circumstances or anticipate every situation. Some of the key policies you need to be aware of are listed in this document. You can also find other policies and resources on our [Enterprise Ethics and Compliance \(EE&C\) program](#) page on One Medical’s [One Source intranet](#). As a subsidiary of Amazon.com, One Medical employees are also subject to [Amazon.com’s Code of Business Conduct & Ethics](#) (“Amazon.com’s Code of Conduct”). See Appendix A (“Applicability of Amazon.com’s Code of Business Conduct & Ethics”).

We are counting on you as part of the One Medical team to embrace the values as described in the Code and to incorporate them into your work each and every day.

This Code applies to all employees and contractors across the organization, as well as officers, directors, temporary employees, and contractors (collectively, “team members”, “you”, or “your”) working for 1Life

Healthcare Inc. and its affiliated entities, including the One Medical professional corporations, Iora Health, Inc., Iora Senior Health, Inc., Iora Health NE DCE, LLC, and their affiliated professional corporations (collectively, “we”, “us”, “our”, or “One Medical”).

Remember, the actions of members of your immediate family, significant others, or other persons who live in your household (collectively, “family members”) also may potentially result in ethical or legal issues to the extent that they involve our business.

For example, if one of your family members accepted an inappropriate gift from one of our suppliers, this could create a conflict of interest for you as a team member of One Medical, and result in a Code violation that is attributable to you.

Consequently, in complying with this Code, you should consider not only your own conduct, but also that of your personal relationships. Personal relationships can be familial, romantic, or financial.

If you encounter a situation that is not specifically addressed by this Code, you should apply the overall philosophy of this Code to the situation, consider guidance from more specific policies, use common sense, and good judgment.

If you are still unsure of what to do, you should review the particular situation with your manager (“leader”) or a member of the Enterprise Ethics and Compliance, Legal, or People Experience teams. See “Asking questions” below. Their doors are open, and they are here to help you.



Our leaders are role models

The One Medical team looks to our leaders for guidance. We expect leaders at all levels to model ethical behavior for their teams and our organization. One Medical leaders should help to ensure their teams are familiar with and receive training on this Code and our policies and practices. The Code is a great resource for leaders to help them answer questions and guide their teams on ethical business conduct.

It is important that leaders:

- **Read and understand this Code**
- **Embrace the Code and set an example as ethical leaders who model compliance with state and federal law**
- **Maintain a workplace environment that is supportive of the Code**
- **Support a safe environment where team members may ask questions or raise good faith concerns, without fear of retaliation**
- **Seek guidance from members of the Enterprise Ethics and Compliance, Legal, or People Experience teams**





Asking questions and reporting concerns

Asking questions

If you have questions about how this Code or our policies apply to your role, you are encouraged to ask:

- **Your leader or any other leader**
- **Any member of the Enterprise Ethics and Compliance (EE&C), Legal, or People Experience teams**
- **Our Ethics HelpLine by phone at 888-495-4384 (international, 800-014-8744) or through the web form [here](#)**

Please remember that you can ask questions without fear of retaliation.

Reporting concerns

In addition to abiding by this Code's principles, if you are aware of any suspected or actual violations of this Code, the law, or our policies (collectively, "concerns"), you have an obligation to report them. Failure to report such events is also a violation of the Code. We do not expect you to conduct your own investigation. Instead, we ask that you report the concern immediately to the appropriate parties. One Medical leaders must promptly report any concerns they receive from you to the appropriate party, which can include Enterprise Ethics and Compliance. If you believe your leader has not taken appropriate action in response to a concern that you reported to them, you have an obligation to report it to the appropriate party as described in the next section of this booklet.

Anonymous reporting and confidentiality

Your reports to the Ethics HelpLine may be anonymous or you may identify yourself and leave your contact information.

While you have the option to remain anonymous, we encourage you to identify yourself to facilitate communication. If you identify yourself, the Enterprise Ethics and Compliance team will make every reasonable effort to keep your identity confidential, even if you don't indicate you want to remain anonymous.

Every report made to our Ethics HelpLine, a member of the Enterprise Ethics and Compliance team, a management member of the Legal or People Experience teams, or to the General Counsel will be confidential.

If you report a concern in good faith and you are not engaged in the questionable conduct, we will make every reasonable effort to keep our discussions with you confidential to the extent reasonably possible and appropriate under the specific circumstances. Information regarding a reported concern or potential violation will be shared only with those on a "need to know" basis, or to comply with applicable laws, policies, or regulations.

All concerns and potential Code violations raised to the Enterprise Ethics and Compliance team, the Legal team, the People Experience team, and the General Counsel are investigated promptly and with the highest degree of confidentiality that is possible under the specific circumstances.



How should you report concerns?

There are many resources available and you should choose the one that makes you most comfortable:

- **Your leader, another One Medical leader, or any leader in senior management**
- **Any member of the Enterprise Ethics and Compliance team, directly at compliance@onemedical.com**
- **Any management member of the Legal team**
- **Any management member of the People Experience team, directly at hr@onemedical.com**
- **A letter to the General Counsel at One Embarcadero Center, 19th Floor San Francisco, CA 94111**
- **Our Ethics HelpLine, by phone at 888-495- 4384 (international, 800-014-8744)**
- **Our Ethics HelpLine, through the web-based reporting form found [here](#)**
- **The Amazon.com Ethics Line, which is available at <https://amazon.ethicspoint.com/>.**

As stated previously, you may report your concerns anonymously, and without fear of retaliation.

Non-retaliation

It is important to understand that One Medical does not tolerate retaliation under any circumstances. You can ask questions or report concerns without fear of retaliation. We will not discharge, demote, discriminate, or tolerate retaliation against you for asking a question, filing a good faith complaint, participating in the investigation of that complaint, or disclosing a concern related to our U.S. federal contracts. See “Disclosing concerns related to our U.S. federal contracts” below.

Anyone on the One Medical team who engages in any form of retaliation will be subject to disciplinary action, which may include termination of your relationship with us.

If you believe that you have been subject to retaliation as a result of asking a question or reporting a concern in good faith, you should make every effort to report it immediately.

Disciplinary action

We commit to investigating all reported concerns or potential non-compliance promptly.

If the investigation indicates that non-compliance with the Code has probably occurred, we will take such action as we believe appropriate under the circumstances. If we determine that you are responsible for Code non-compliance, you will be subject to disciplinary action up to and including termination of your relationship with us. Appropriate action may also be taken to deter any future Code non-compliance.

For further information, including how to contact the Chief Compliance Officer, see our [Enterprise Ethics and Compliance Program](#) page on *One Source*.



Disclosing concerns related to our U.S. federal contracts

We may enter into contracts directly with the U.S. federal government (“prime contracts”), or enter into contracts with other companies related to their prime contracts with the U.S. federal government (“subcontracts”). If you have information that you reasonably believe is evidence of gross mismanagement of our prime contracts or subcontracts, a gross waste of federal funds, an abuse of authority relating to our prime contracts or subcontracts, a substantial and specific danger to public health or safety, or a violation of law, rule, or regulation related to our prime contracts or subcontracts (including the competition for or negotiation of the prime contracts or subcontracts), you have two methods of reporting it.

First, we encourage you to report it to any of the available resources listed above under “How should you report concerns?”.

Second, you may alternatively or in addition disclose the information to:

- **A member of Congress**
- **A representative of a committee of Congress**
- **An Inspector General**
- **The Government Accountability Office**
- **A federal employee responsible for contract oversight or management at the relevant agency**
- **An authorized official of the Department of Justice or other law enforcement agency**
- **A court or grand jury**
- **A management official or other employee of the prime contractor who has the responsibility to investigate, discover, or address misconduct, if we are a subcontractor**

We do not require you to sign or comply with internal confidentiality agreements or statements that prohibit or restrict you from lawfully reporting to a designated investigative or law enforcement representative of a federal department or agency authorized to receive the information (e.g., agency Office of the Inspector General) waste, fraud, or abuse related to the performance of our prime contracts or subcontracts.

Whistleblower policy

To promote our culture of compliance and to facilitate open and honest communication around our business practices, we have implemented a [Whistleblower Policy](#). We encourage the reporting of good faith complaints, so that we can address any potential issues. With respect to any reported complaints that may involve accounting, internal accounting controls, or auditing concerns, the Audit & Compliance Committee of the Board of Directors is notified, and is responsible for supervising and overseeing the inquiry and any investigation that is undertaken.



Maintaining a safe and respectful workplace

We believe that a safe and respectful workplace – free of discrimination and harassment – is critical to creating an environment where our team members can do their best work and serve our patients in accordance with our mission. We have created policies and practices to support this goal. For further details, see the [Harassment & Discrimination Policy](#).

Equal employment opportunity

One of our guiding principles is to provide equal employment to qualified individuals, regardless of their race, color, religion, gender, sexual orientation, gender identity, gender expression, transgender status, national origin, ancestry, age, physical or mental disability, legally protected medical condition, genetic information, marital or family status, pregnancy (including childbirth, breastfeeding, or any related medical condition), requests for or use of family or medical leave, citizenship, status as a covered veteran, political or religious affiliation, or any other category protected by law. Our work environment promotes fairness and equal opportunity in all aspects of the employment relationship, including recruitment, hiring, work assignment, promotion, transfer, termination of employment, wage and salary administration, and selection for training.

Diversity and inclusion

We are a human-centered organization that aspires to provide world-class, culturally competent healthcare to all. We embrace diversity, and we have worked to create an inclusive environment where both our similarities and differences are valued and celebrated.

We are committed to building teams that reflect the diverse communities and populations we serve, both now and in the future.

Diversity includes gender, race, ethnicity, sexual orientation, disability, religion, and age, but it does not stop there. For us, diversity extends to our individuality, our experiences, and the way we interact with the world. We recognize that part of being and maintaining a diverse workplace is a commitment to continuous learning, having conversations about each other and our differences, and building an environment where everyone is comfortable bringing their authentic selves to work. We treat all people with professional respect and courtesy, and we expect the same level of respect in return — whether we are interacting with other team members, patients, business partners, or visitors.



A discrimination and harassment-free work environment

All team members, patients, business partners, and visitors must be treated with professional respect and courtesy. Harassment, which may be of a sexual, physical, written, or verbal nature, and discrimination will not be tolerated. If you witness, are informed of, or experience discrimination or harassment, please report it immediately. See “Reporting concerns” above.

A safe and healthy environment

We have the right to a clean, safe, and healthy work environment, free of illegal drugs, alcohol, and workplace violence. You should not be under the influence of drugs (including inappropriate use of lawful medications), controlled substances, or alcohol while at work. Drugs and alcohol can impair your ability to do your job and may put other team members, patients, business partners, or visitors at risk. We will not tolerate actions or threats by anyone who disrupts business activities or places our team members, patients, business partners, or visitors at risk of harm. To the extent allowed by law, possession or use of weapons, firearms, firearm ammunition, firearm replica, or firearm components by team members, patients, business partners, or visitors on our owned or leased property or at our events, regardless of whether someone possesses a license to carry a concealed weapon, is prohibited.

If you have a concern for your safety or the safety of someone else, please contact Corporate Safety and Security at security@onemedical.com.

Workplace safety also extends to our physical work environment. All team members are responsible for using safe work practices, following all policies and procedures, and assisting in maintaining a safe work environment. And leaders are responsible for ensuring that all safety and health policies and procedures are clearly communicated, understood, and adhered to by all team members.

Each employee has the responsibility to promptly report any accidents, injuries and unsafe conditions, procedures, or behaviors to People Experience at hr@onemedical.com. For further details, refer to the [Injury & Illness Prevention Plan](#).



Integrity in patient care

Philosophy of care

We are committed to delivering quality care to our patients in a compassionate, respectful, and efficient manner. Everything we do should advance our commitment to delivering the highest-quality care to our patients, who will be treated with dignity, respect, and courtesy at all times.

To deliver quality care, we ensure that we are accessible and responsive to our patients. We listen to them carefully and focus on understanding their agenda and needs. We practice empathy. We seek an enlightened approach to every medical decision, based on the deepest possible understanding of the risks and benefits involved. To this end, we present our patients with a range of options and information and give them some leeway to choose their own best course of action. We stay up-to-date on clinical research and practice evidence-based medicine whenever possible, and we embrace complementary and alternative approaches when appropriate. We make careful use of our resources by using diagnostic tests, consults, and other medical resources appropriately.

We make no distinction in the availability of services or in the quality of care we provide based on our patients' age, gender, disability, race, color, religion, national origin, sexual orientation, gender identity, gender expression, transgender status, ancestry, military status, marital status, or any other classification protected by law.

Privacy and security

Our patients and their families need to be able to trust that we will protect and maintain the confidentiality of their protected health information ("PHI"), and personally identifiable information ("PII"), which includes any information that can be used to distinguish or trace an individual's identity. If we don't earn and maintain our patients' trust, they may be reluctant to provide us with aspects of their history or medical conditions, which could impact how we provide treatment. Therefore, you must protect our patients' privacy in accordance with our privacy practices. See our [Privacy Program page](#). Further, consistent with the Health Insurance Portability and Accountability Act (HIPAA), you are required to protect and maintain the confidentiality of all PHI and participate in regular, ongoing HIPAA privacy and security training. Except in limited circumstances, HIPAA permits One Medical to access, use, and disclose PHI without patient authorization for purposes of treatment, payment, and healthcare operations. In addition, One Medical is permitted to disclose PHI when specifically authorized by the patient or their personal representative. For more detailed information regarding HIPAA policies and practices, visit our [Privacy Program page](#).

All One Medical team members must adhere to our policies and federal and state laws governing privacy. Failure to comply with these policies and laws may result in disciplinary action, up to and including termination of your relationship with us.

To protect our patients' privacy, keep these best practices in mind:

- Access, use, and disclose only the minimum amount of PHI necessary to perform the patient care or business duties of your role with One Medical
- Do not discuss PHI with others who do not have a role-related need to know
- Do not share or post IDs or passwords
- Log off and lock computers when they are not in use, even if you are walking away only for a moment
- Visually protect PHI, including when storing paperwork
- Assess your surroundings, including the people present, prior to discussing PHI
- Dispose of paper containing PHI in confidential disposal bins
- Do not mention, make reference to, or post any PHI, including documents, photos, videos, or audio recordings, to any social networking sites or blogs
- Take care when faxing, emailing, or mailing PHI to ensure the correct patient's information is going to the correct person
- See "Asking questions" above
- Contact a member of the Privacy Office. The Privacy Office can be reached directly at privacy@onemedical.com





Protecting confidential information

In addition to protecting PHI and PII, we protect our confidential information. Our “confidential information” means any information that we do not plan or want to make publicly known at a given time. It includes (without limitation):

- **Non-public information about One Medical, Amazon.com, our retail customers, services clients, vendors, other business partners, and other third parties, or any of their customers**
- **Technical, business, financial, and marketing information, forecasts, strategies, and other types of business information, including patient and client lists**
- **Product roadmaps and development plans, code, documentation, algorithms, know-how, trade secrets, formulas, processes, procedures, ideas, research, inventions, and schematics**
- **Network and security information**
- **Contracts or proposals**
- **Internal investigation matters, litigation matters, government inquiries, and investigations**

We expect that you will safeguard all confidential information — whether it belongs to us or third parties — to which you may have access as a team member or through your engagement with us. Do not disclose confidential information to anyone outside of One Medical and Amazon.com. This includes any non-public information about these companies, our retail customers, services clients, vendors, other business partners, and other third parties, or any of their customers.

“Third-party confidential information” is any non-public information that the third party designates as confidential or that, given the nature of the information or the circumstances surrounding its disclosure or discovery, reasonably should be considered confidential. You must protect third-party confidential information in the same way as you protect our confidential information.

Employees should access and use confidential information only to the extent necessary to perform their job responsibilities, and should disclose such information internally only to other employees who need to know such information to perform their job responsibilities.

Documents (including email) containing confidential information should be marked “Confidential” before they are distributed, preferably within the document or email itself. To the extent employees receive documents containing confidential information from third parties, make sure that the documents are likewise appropriately marked as “Confidential”.

As described in the Confidential Information and Inventions Assignment Agreement that you signed as a team member, your obligations to safeguard all confidential information continues even after you are no longer a team member or engaged by us.

We also respect confidentiality obligations to previous employers. Please do not use or reveal to us any information that might reasonably be considered confidential information of a former employer.



Insider trading

Federal and state laws prohibit trading in securities by persons who have material information that is not generally known or available to the public.

Employees may not a) trade in stock or other securities while in possession of material nonpublic information or b) pass on material nonpublic information to others without express authorization by the Company or recommend to others that they trade in stock or other securities based on material nonpublic information.

Please refer to our [Amazon.com, Inc. Insider Trading Guidelines](#) for more detailed information on our trading policies and what information may be considered material non-public information. Certain employees must comply with trading windows and/or preclearance requirements when they trade Amazon.com securities. Please contact the Legal team at pre-clearance@onemedical.com for any questions on your ability to trade in our securities.

Protecting intellectual property

The innovative practices, methods, and technology we use to deliver our exceptional care are some of the keys to our success. To that end, we must protect our “intellectual property”, which includes our inventions, innovations, discoveries, trademarks, copyrights, logos, software code, business processes, workflows, tools, data, trade secrets, patents, domain names, concepts, designs and related rights. We expect you to protect our intellectual property and only use it or disclose it in accordance with our policies or guidelines. If you are developing a new product or service or updating an existing product or service that may produce work that can be protected by any form of intellectual property rights, or want to use a new name, brand, design, or

advertising tagline, etc., please contact the Legal team prior to any internal or public-facing use for further advice. You should also reach out to the Legal team if you are interested in creating or choosing a new domain name or social media handle. Do not attempt to acquire or register domain names that include our names or Amazon names on your own.

Maintaining the confidentiality of our confidential information is an important element of protecting our intellectual property. We expect you to exercise due diligence to prevent unauthorized personnel from accessing our facilities, systems, technology and information. If you publish any writing or speak at any public or external private events such as conferences or industry gatherings, please make sure you adhere to our [Publication Review Policy](#), so we can review for opportunities for intellectual property protection.

We also believe that it is important to respect the intellectual property rights of third parties. All software and technology used by us to conduct business must be appropriately licensed and used in accordance with our information technology policies and the terms and conditions of use. Making or using unauthorized copies of software or devising ways to obtain unauthorized access to software services may constitute copyright infringement and may expose us and you to civil and criminal liability. If you are interested in using a third party’s brand, designs, software (including Open Source Software), technology, data or materials or are considering collaborating with someone outside of our company (including Standards Organizations, Professors, and Universities), please contact the Legal team prior to contacting the third party.



In very limited circumstances, we may agree to license our trademarks, patents or patent applications, copyrighted work or materials to third parties—but always with explicit terms designed to maintain and protect the value of our intellectual property and ensure that customers can identify the products and services associated with our marks. If you are interested in allowing a third party to use our intellectual property, it's required that you first contact the Legal team to review the proposed use and advise on a potential license and usage guidelines.

Works published in hard copy or on the Internet, such as white papers, product information, reference works, newsletters, blogs, compilation of data, sound recordings, imagery, graphics, or photographs may be protected by copyright or otherwise have use restrictions. Do not make copies of these materials or incorporate them into our products materials without first consulting a member of the Legal team.

If you believe a third party may be violating our intellectual property rights, please contact the Legal team. To avoid confusion, overlap, or potentially damaging communications with consequences harmful to the company, it is extremely important that employees do not attempt to enforce our intellectual property rights without Legal approval. Likewise, if you are contacted by someone outside of our company about intellectual property, contact the Legal team for further advice (do not investigate on your own or visit any relevant links).



Complying with laws and regulations related to our business

Employees must follow applicable laws, rules and regulations at all times. Employees with questions about the applicability or interpretation of any law, rule or regulation, should contact Legal. Medical service providers are also subject to various laws and regulations specific to the delivery of healthcare services, including Privacy; Fraud, Waste, and Abuse; compliance with Medicare Part C obligations; Kickbacks; and Self-referrals.

The following are a sampling of key concepts that affect our business:

International business laws

Although we do not provide healthcare services outside of the United States (U.S.), there may be situations in which we do business with individuals or organizations in other countries. In these situations, employees are expected to comply with laws (foreign and domestic) that prohibit bribery and corruption. In our dealings with individuals, organizations, or government officials, you must never offer or accept—directly or indirectly—anything of value to get or keep business.

In addition, we expect you to comply with U.S. laws, rules and regulations governing the conduct of business by its citizens and corporations outside the U.S. You should consult with a member of the Legal team to be certain that you are aware of, understand, and abide by these rules.

These U.S. laws, rules and regulations, which extend to all our activities outside the U.S., include:

- **The Foreign Corrupt Practices Act, which prohibits directly or indirectly giving anything of value to a government official to obtain or retain business or favorable treatment, and requires the maintenance of accurate books of account, with all our transactions being properly recorded;**
- **U.S. embargoes, which generally prohibit U.S. companies, their subsidiaries, and their employees from doing business with countries or territories, or traveling to countries and territories, subject to sanctions imposed by the U.S. government, as well as specific companies and individuals identified on lists published by the U.S. Treasury Department;**
- **U.S. export controls, which restrict exports from the U.S. and re-exports from other countries of goods, software and technology to many countries, and prohibit transfers of U.S.-origin items to denied persons and entities; and**
- **Anti-boycott regulations, which prohibit U.S. companies from taking any action that has the effect of furthering or supporting a restrictive trade practice or boycott imposed by a foreign country against a country friendly to the U.S. or against any U.S. person.**

If you have a question concerning any of these laws, rules, or regulations, seek assistance from a member of the Legal team before taking any action.



Price Fixing

Employees may not discuss prices or make any formal or informal agreement with any competitor regarding prices, discounts, business terms, or the market segments and channels in which the Company competes, where the purpose or result of such discussion or agreement would be inconsistent with applicable antitrust laws. If you have any questions about this section or the applicable antitrust laws, please contact the Legal Department.

Bribery

We conduct ourselves lawfully and ethically in all of our dealings with public officials, other companies and with private citizens. We never seek to influence them through any improper means, whether directly or indirectly. This includes unethical payments, inappropriate gifts, meals, or entertainment or inappropriate political or charitable contributions. We wish to avoid even the appearance of any amount of improper influence.

Fair Dealing

We strive to outperform our competitors fairly and honestly. Advantages over our competitors are to be obtained through superior performance and the quality of services provided to our patients, not through unethical or illegal business practices. We are expected to deal honestly and fairly with our patients, business partners, vendors, and suppliers. We want to create positive business relationships that never take unfair advantage of anyone by misleading or deceiving them. You must always be truthful about us and never make any claims that we cannot substantiate. You must adhere to principles of fair competition in the

purchase of products and services by selecting vendors or suppliers based exclusively on normal commercial considerations, such as quality, cost, availability, service and reputation, and not on the receipt of special favors.

We provide open and fair opportunities to our business partners regardless of their nationality or size. Suppliers should be selected on a competitive basis based on qualitative and quantitative criteria, including quality, suitability, experience, performance, service, technology, and price. We strive toward establishing mutually beneficial relationships with our suppliers based on close cooperation and open communication. Terms and conditions defining our relationship with suppliers are communicated early in the supplier selection process. Any agreements to those terms and conditions, or any acceptable modifications, are reached before work begins.

Additionally, we take into account that federal law prohibits Medicare from paying for items or services provided by a person or entity excluded from Medicare, Medicaid, or other federal programs when selecting a vendor or supplier. Enterprise Ethics and Compliance and HR perform exclusion list screenings prior to contracting with and hiring employees, contractors, vendors, and downstream entities prior to hiring and monthly thereafter as required by our Medicare contracts.



Detecting and preventing fraud, waste, and abuse

We are committed to preventing, detecting, correcting, and reporting fraud, waste, and abuse in our business. Definitions and examples of fraud, waste, and abuse in the healthcare setting include the following:

Fraud occurs when a person intentionally deceives or misrepresents information that he or she knows to be false or does not believe to be true. Examples include:

- **Knowingly billing for services not furnished or supplies not provided, including billing Medicare for appointments that the patient failed to keep**
- **Billing for services that have not been properly documented**

Waste occurs when there is no intent to deceive for monetary gain, but there is inappropriate utilization or extravagant, careless, or unnecessary use of resources. Examples include:

- **Conducting excessive office visits or writing excessive prescriptions**
- **Prescribing more medications than necessary for the treatment of a specific condition**
- **Ordering excessive laboratory tests**

Abuse occurs when payment is made for items or services where there was no intent to deceive or misrepresent, but the outcome of poor or insufficient methods results in unnecessary costs. Examples include:

- **Billing using improper codes, or billing separate services that should be bundled under the same procedural terminology code**
- **Billing for unnecessary medical services**
- **Billing for complex in-office tests when less complex diagnostics were performed**
- **Charging excessively for services or supplies**

Accurate coding and documentation for patient care services is a necessary component in preventing fraud, waste, and abuse. We are committed to ensuring accurate, timely, and complete coding and billing for all services rendered, which include the following:

Only bill for services that are:

- **Medically necessary**
- **Actually provided**
- **In accordance with applicable billing guidelines**
- **Provided to the patient who received the item or service**
- **If applicable, ordered by a physician or appropriately licensed mid-level professional (nurse practitioner or physician assistant)**
- **Properly documented, including accurate dates of service**

Only assign billing codes that we believe in good faith accurately represent the services that have been provided and are supported by documentation in the medical record.

Implement good-faith controls to prevent unbundling, up-coding, and duplicate or otherwise erroneous billing. Respond to coding and billing inquiries and resolve inaccuracies in a timely manner.

Each provider who bills for their clinical services is ultimately responsible for their documentation and coding practices. We will provide oversight and learning opportunities to help to ensure that clinicians have the tools to do this correctly. If you feel that you need assistance or training on this topic, please contact your leader.



Consequences of fraud, waste, and abuse

In the healthcare business, we are subject to a number of state and federal laws that exist to prevent fraud, waste, and abuse of healthcare resources. For example, the Federal False Claims Act and related state laws prohibit a provider or individual from knowingly and willfully making false statements or representations in connection with the filing of a claim seeking reimbursement. Violations of these laws can trigger civil and criminal fines and penalties. Penalties may include imprisonment, substantial fines, or exclusion from participation in Medicare, Medicaid programs, or other government programs.

Please see the [Fraud, Waste and Abuse](#) page.

Kickbacks and referrals

A “**kickback**” is anything of value intended to improperly obtain or reward favorable treatment in connection with a prospective or actual business arrangement. You cannot do any of the following:

- **Offer, provide, solicit, or accept a kickback**
- **Attempt to offer, provide, solicit, or accept a kickback**
- **Directly or indirectly include the amount of a kickback in the price we charge under a business arrangement**

Federal and state healthcare anti-kickback statutes specifically prohibit medical providers and related businesses from offering, providing, soliciting, or accepting a kickback in return for, or to induce, the referral of any patient or healthcare business. You cannot enter into any of these types of prohibited arrangements, which include but are not limited to receiving or making payments in exchange for patient referrals, and splitting with a third party a physician’s fee to the patient for healthcare services.

The laws can be broadly interpreted so that even where there are other, entirely legitimate business purposes present, if at least one purpose of the arrangement is to exchange money for the referral of services or to induce further referrals, the arrangement may be prohibited.

Common targets of kickback investigations are physicians, marketers, consultants, and business owners.



Self-referrals

Federal and state healthcare anti-kickback statutes specifically prohibit medical providers and related businesses from offering, providing, soliciting, or accepting a kickback in return for, or to induce, the referral of any patient or healthcare business. You cannot enter into any of these types of prohibited arrangements, which include but are not limited to receiving or making payments in exchange for patient referrals, and splitting with a third party a physician's fee to the patient for healthcare services.

The laws can be broadly interpreted so that even where there are other, entirely legitimate business purposes present, if at least one purpose of the arrangement is to exchange money for the referral of services or to induce further referrals, the arrangement may be prohibited.

Common targets of kickback investigations are physicians, marketers, consultants, and business owners.

Controlled substances

Most licensed providers we employ are registered to prescribe narcotics and other controlled substances. Improper use of these substances is illegal and extremely dangerous. We are committed to complying with the federal and state laws regulating controlled substances.

Access to controlled substances or controlled prescription pads is limited to persons who are properly licensed and who have express authority to handle them. Healthcare providers may only prescribe controlled substances in conformity with state and federal laws and the terms of the provider's license. Unauthorized manufacture, distribution, use, or possession of controlled substances is strictly prohibited.





Avoiding conflicts of interest

In performing their job duties, employees are expected to use their judgment to act, at all times and in all ways, in the best interests of One Medical and Amazon.com. A “conflict of interest” exists when an employee’s personal interest interferes with the best interests of One Medical or Amazon.com. For example, a conflict of interest may occur when an employee or a family member receives a personal benefit as a result of the employee’s position. A conflict of interest may also arise from an employee’s business or personal relationship with a customer, supplier, competitor, business partner, or other employee, if that relationship impairs the employee’s objective business judgment.

Employees are expected to be exclusively employed by One Medical. But with prior company approval, there are instances where you may take on outside business activities, including employment or the development of products or other technology. If you would like to engage in an outside work activity, fill out the [Outside Activities Disclosure Form](#) to seek approval and ensure that the activity will not create a conflict of interest. In jurisdictions where there are health and safety related working time restrictions, you must report any outside business activities through the form to ensure that they do not violate these restrictions.

In certain instances, conflicts of interest may arise despite your best efforts to avoid them. Specific facts and circumstances vary, but the following non-exhaustive list contains examples where there’s potential for a conflict of interest. If any of these apply to you, or you need guidance on a potential conflict, you should promptly discuss the situation with the Legal team:

- **Direct or indirect ownership of, or substantial interest in, a company that is a competitor or a supplier of goods and services to One Medical**
- **Paid advisory or consultative services to a business or startup, even if unrelated to your role at One Medical**
- **Personal acceptance of more than de minimus (more than \$15) gifts, payments, or services from those doing business, or seeking to do business, with One Medical**
- **Serving as a director, officer, consultant, or other key role with a company doing (or seeking to do) business with or competing with One Medical**
- **Serving on the board of directors of a for-profit company**
- **Hiring or contracting with family members or friends to provide goods and/or services to One Medical**
- **Any business or financial interest or relationship you or a member of your family has that might appear to influence your ability to meet your obligations to One Medical**
- **Hiring or contracting with family members or friends to provide goods and/or services to One Medical**
- **Investments in non-public entities where the investment could impair your ability to act in the best interest of One Medical and Amazon.com.**
- **Being in the same direct reporting line as someone with a familial, romantic, or financial connection to you, or otherwise being involved in their performance evaluation process**
- **Outside employment if it (a) relates to One Medical’s or Amazon.com’s businesses, (b) overlaps or conflicts with your duties here, or (c) competes with or is similar to any product or service developed or being developed by One Medical or Amazon.com**



Business courtesies and gifts: business partners

We deal with many business partners (e.g. suppliers, consultants, vendors). It is our policy to select business partners on the basis of factors such as price, quality, performance, customer service assistance, and reputation.

We do not conduct business through the improper use of courtesies, gifts, or relationships. You should not accept or solicit any benefit or other item of economic value from an existing or potential business partner that might compromise — or appear to compromise — your objective assessment of the business partner's products or services.

Finally, you may not solicit or use your position to obtain special discounts or other favorable treatment (such as a free gift) for yourself or others that are not extended by the business partner to all team members.

Accepting or giving common, non-cash courtesies is acceptable, provided that: (a) the value of the gift is nominal (\$15 or less) in relation to the circumstances in which it was offered and accepted; and (b) it is not intended to influence a business transaction or your performance of job duties. For more detail on accepting or giving gifts, see the [Gifts Policy](#).

Giving and receiving patient gifts

While we strive to provide our patients with the best care and patient experience, we need to be careful that any non-medically required item, gift, or service of value we provide to patients meets legal requirements. Guidance from the Office of the Inspector General states that providers may offer Medicare or Medicaid beneficiaries inexpensive gifts or services without violating beneficiary inducement statutes.

Generally, this means that we can offer patients gifts of nominal value (\$15 or less, for a cumulative annual total of no more than \$75 per patient) for a legitimate customer service reason. Similarly, we can only accept gifts of appropriate value from a patient when it is clear that the motivation for the gift is to thank the employee for providing excellent customer service.

Gifts and government officials

As a reminder, One Medical team members are expressly prohibited from giving gifts of any type to any government officials. Government officials may come from city, county, state or federal offices, and include roles such as law enforcement, city officials, inspectors, auditors, etc.

If a government official attempts to solicit a gift from a One Medical team member, you must promptly notify the Enterprise Ethics Compliance or Legal teams. Please refer to the [Gifts Policy](#) for more information.

Corporate opportunity

You may not take personal advantage of our opportunities that are presented to you or discovered by you as a result of your position with us or through your use of corporate property or information, unless authorized by your leader and the Chief Compliance Officer. In short, you may not use your position with us or corporate property or information for improper personal gain.



Using assets and resources appropriately

We expect you to care for and responsibly use our assets, which include our computers, other equipment and technology resources, files, and work supplies. If you use our equipment at your home or outside of one of our offices, take precautions to protect it from theft, damage, or unauthorized access, just as if it were your own. If your relationship with us terminates for any reason, you must immediately return all our resources, assets, and equipment in normal operating condition.

Use of email and other forms of electronic communication

When using our technology and communication systems (such as texting, tweeting, video conferencing, or instant messaging, etc.), please be sure that usage is appropriate, professional for business purposes, and in accordance with this Code. Follow simple rules of etiquette and common sense when preparing, sending, and forwarding these communications. Internet use that is not related to our activities should be minimized at the workplace during business hours.

Privacy and your use of our resources

While we endeavor to respect your personal privacy, it is important to understand that information created, accessed, transmitted, or stored using our technology resources and information systems, such as email or instant messages, computer files, telephone messages, or websites in your browsing history, are our resources and assets. Therefore, you should not expect that personal information stored or transmitted through our systems and/or using our resources is private. We may access, monitor, or inspect our resources, assets, and property at any time without prior consent or knowledge of affected team members to the extent permitted by law. This includes monitoring and retrieving information that is stored or transmitted on our electronic devices, computer equipment, and systems.

For further details, please see the [Acceptable Use Policy](#).



Communicating appropriately

Advertising and marketing

We strive to comply with all applicable laws and other legal requirements pertaining to the advertising and marketing of our services. This means we must ensure that our advertising and marketing practices are truthful, accurate, and not unfair or deceptive. We should understand and follow consumer protection laws and other applicable laws and regulations. When marketing, we should also respect the consumer's privacy rights, including giving them a choice in how they interact with us with respect to our marketing activities.

Marketing to Medicare beneficiaries is further subject to the regulations, policies, and compliance guidelines from the Centers for Medicare and Medicaid Services (CMS), as well as contractual requirements to which we are subject as part of our participation in Medicare Advantage plans and the ACO REACH program. Marketing and communications to Medicare beneficiaries must strictly adhere to all applicable requirements. When in doubt about a particular practice or communication, please reach out to the Legal team.

Media requests

Unless you are an employee specifically designated to speak with the media on the company's behalf, you should refer all inquiries from the media or other third parties to our Public Relations team. For further guidance, see our [Communications Guidelines](#).

Social media

If you share our information in any public forum, such as bulletin boards, chat rooms, social media sites, blogs, or any other online forum, you should be careful not to disclose company confidential information or third-party confidential information, and you should ensure that the content of the postings is consistent with this Code and our policies. Do not identify yourself as speaking on our behalf when linking to our website from your personal blog, website, or other social networking site, and do not associate us with your own personal opinion. For further guidelines, see our [Social Media Policy](#).



Law enforcement and government

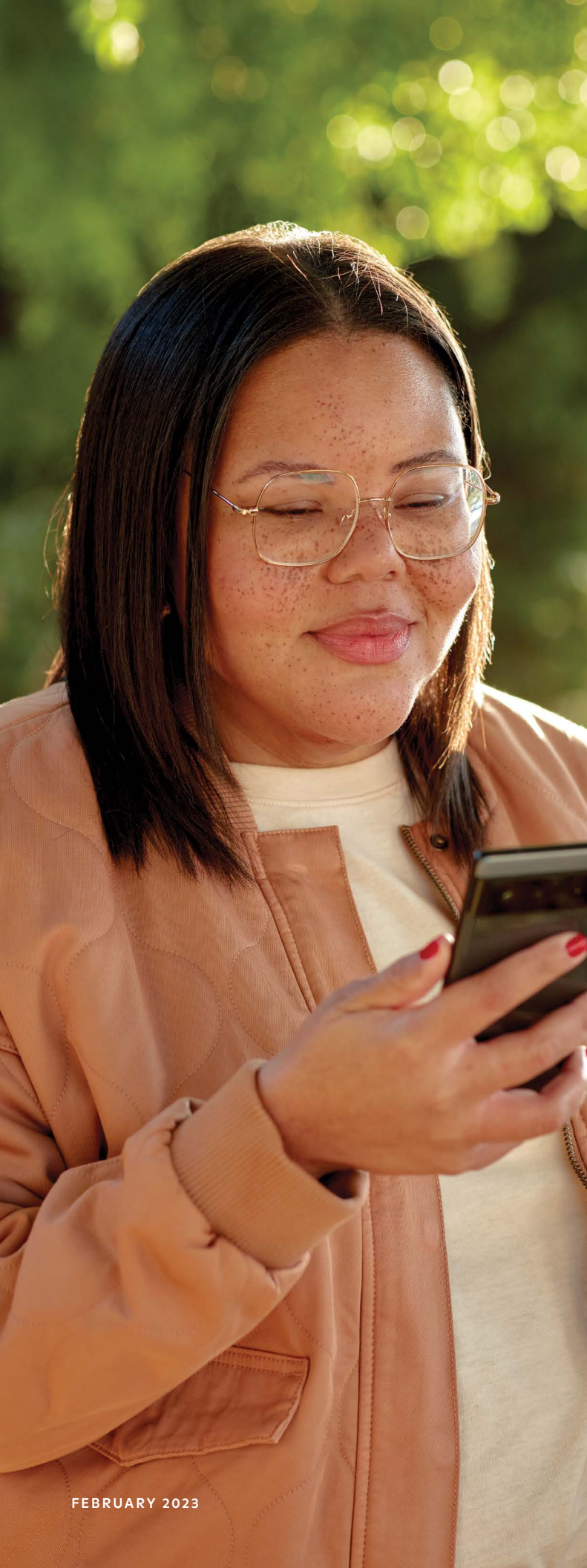
For subpoenas pertaining to medical records of our patients, see our [subpoena page](#). For all other documents or property that may be requested by a government or law enforcement officer, you must promptly notify and consult with a member of the Legal team prior to providing any of our documents or property. However, please see “Disclosing concerns related to our U.S. federal contracts” above for an important exception.

We support community involvement

We know that creating a healthy environment helps create healthier people. We strive to be good corporate neighbors by being active in the communities we serve. You are, of course, free to participate, as a private citizen, in the political process or as an advocate for religious and charitable organizations. Please ensure that your participation does not interfere with the satisfactory performance of your official duties, incorrectly imply our endorsement or involvement, or create a conflict of interest.

We encourage employees to engage in the political process in their communities. However, carrying out that engagement at work may be disruptive.

We ask everyone to avoid conducting political activism in the workplace. This includes posting your opinion on elections, candidates, and political issues on company assets or lobbying your co-workers. This behavior may be well intended, but tends to lead to conflict, and may cause people who disagree to feel excluded or marginalized. Employees are free to make personal contributions to candidates or political causes, but such contributions may not be made on behalf of One Medical.



Environmental compliance

Federal law imposes criminal liability on any person or company that contaminates the environment with any hazardous substance that could cause injury to the community or environment. Violation of environmental laws can involve monetary fines and imprisonment.

We expect employees to comply with all applicable environmental laws.

We are committed to conducting business in an environmentally responsible manner and strive to improve our performance to benefit our employees, customers, communities, shareholders, and the environment. We are committed to minimizing and, if practicable, eliminating the use of any substance or material that may cause environmental damage, reducing waste generation and disposing of all waste through safe and responsible methods, minimizing environmental risks by employing safe technologies and operating procedures, and being prepared to respond appropriately to accidents and emergencies.

We strive to use energy wisely and efficiently and employ technology to minimize any risk of environmental impact. Employees whose work affects environmental compliance must be completely familiar with the permits, laws, and regulations that apply to their work. All employees are responsible for making sure that our business is conducted in a way that is protective of the environment.



Maintaining accurate and timely records and financial reporting

Maintaining information and records accurately and completely is vital to the success of our business. A record is defined as a book, document, or any other data, regardless of the type or form. A record may be written or electronic, including emails. Records may contain financial, medical, or operational data. We are obligated to accurately and truthfully document our work and to not make false or misleading oral or written statements about it. We will not take any action to manipulate, mislead, coerce, or inappropriately influence any independent auditor engaged in an audit of our financial statements.

When preparing source documents for financial transactions, it is important to provide accurate information so that costs can be allocated to the appropriate service. No payment may be approved or made with the intention or understanding that any part of the payment is to be used for a purpose other than our business. Failure to maintain accurate books and records may expose us to significant fines, as well as civil and criminal penalties.

Our accounting records are also relied upon to produce reports for our management, stockholders and creditors, as well as for governmental agencies. In particular, we rely upon our accounting and other business and corporate records in preparing the periodic and current reports that we file with the U.S. Securities Exchange Commission ("SEC"). Securities laws require that these reports provide full, fair, accurate, timely and understandable disclosure and fairly present our financial condition and results of operations.

We strive to ensure that our financial disclosure is accurate and transparent and that our reports contain all of the information about us that would be important to enable stockholders and potential investors to assess the soundness and risks of our business and finances

and the quality and integrity of our accounting and disclosures. In addition:

- **You cannot take or authorize any action that would intentionally cause our financial records or financial disclosure to fail to comply with generally accepted accounting principles, the rules and regulations of the SEC or other applicable laws, rules and regulations;**
- **You must cooperate fully with our Finance and Accounting Department, as well as our independent public accountants and counsel, respond to their questions with candor and provide them with complete and accurate information to help ensure that our books and records, as well as our reports filed with the SEC, are accurate and complete; and**
- **You cannot knowingly make (or cause or encourage any other person to make) any false or misleading statement in any of our reports filed with the SEC or knowingly omit (or cause or encourage any other person to omit) any information necessary to make the disclosure in any of our reports accurate in all material respects.**

Keeping accurate books and records and retaining them for retrieval is an important part of our daily business. It is a criminal offense to destroy records that are subject to a subpoena or government investigation. Records must be maintained in accordance with our records retention guidelines, and must not be destroyed before the prescribed retention period has expired or until threatened or pending litigation or government investigations are concluded. If you have a question about the records retention guidelines, seek assistance from a member of the Legal team before taking any action.



Periodic Certification

The Legal Department may designate certain employees who, based on their level of responsibility or the nature of their work, will be required to certify periodically that they have read, understand and complied with the One Medical Code and/or Amazon.com's Code of Conduct.

Waivers

Waivers of this Code of Conduct may be made only in a manner permitted by law.

Amending this Code

We're committed to regularly reviewing and updating our policies and standard work (procedures), including this Code. The most current version of this Code is always available on the [Enterprise Ethics and Compliance page](#) on One Source, and we encourage you to review it periodically to stay aware of any changes.

Amazon.com similarly retains the right to review and update the Amazon.com Code of Conduct. The most current version of Amazon.com's Code of Conduct is available [here](#).

Our ethics and compliance program resources

See our [Enterprise Ethics and Compliance \(EE&C\) One Source program page](#) for a description of our ethics and compliance program, our Code of Business Conduct, our policies, links to other resources, and the contact information for the Chief Compliance Officer. Thank you for your dedication to ethics and compliance as we work together to transform healthcare for all.



Appendix A

Applicability of the Amazon.com Code of Business Conduct & Ethics

As a subsidiary of Amazon.com, One Medical employees are also subject to Amazon.com’s Code of Business Conduct & Ethics (“Amazon.com’s Code of Conduct”). The One Medical Code imposes some additional requirements on One Medical employees. But it is not intended to limit the requirements of the Amazon.com Code of Conduct in any way. To the extent circumstances do create an inconsistency between the two Codes, the Amazon.com Code of Conduct controls.

The Amazon.com Code of Conduct is available on Amazon.com’s publicly-facing [Investor Relations](#) website. Contact Legal or HR to request a copy of Amazon.com’s Code of Conduct or related policies.

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