

At Devoted, we are building better healthcare for Medicare beneficiaries and are delivering on our promises to our members. Each of us must be committed to the highest standards of business conduct. We require all associates, officers, directors and our business partners to understand and follow these high standards while doing their jobs for Devoted. Although we are a very young company, we are built for the long term.

Our Code of Conduct reflects Devoted Health's core values. In fact, our Code, is at the very foundation of our core values:

- 1. We are a paragon of hypercompliance with the letter and spirit of the law.**
- 2. Every member is family.** Love for each other and for our members is at the heart of everything we do.
- 3. We build for a rolling 20-year time horizon.**

This document is your guide in understanding and following Devoted's high standards of business conduct.

Policy Brief & Purpose

Our Employee Code of Conduct policy outlines our expectations regarding employees' behavior towards our members, their colleagues, and overall organization. This code of conduct also outlines our obligation to the federal government and the laws governing the Medicare program.

Scope

This policy applies to all our employees, regardless of employment agreement or rank, business partners and Board Members.

Policy Elements

Devoted employees are bound by our Code of Conduct while performing their duties in work and also outside the workplace. If you become aware of a violation of this Code, our policies, or the law and regulations, you have an obligation to report it right away. If you are ever in doubt about the right thing to do in reporting a violation or conducting Devoted business, ask for help!

Disciplinary Action

Whether you are an associate, leader, or officer, you may be disciplined or lose your job if you:

- Do not follow this Code of Conduct
- Break any laws or regulations that apply to Devoted
- Tell an associate to violate the Code, a Devoted policy, a law or a regulation
- Fail to share information, or provide false information in connection to an investigation
- Intimidate or retaliate against an associate who reports a suspected violation regardless of whether the report is made within Devoted or to outside law enforcement or government agency
- Neglect to address or report a violation of the Code, or a law or regulation, committed by you, a colleague or someone you manage

How to report a potential violation of this Code, Compliance concern, or potential Fraud Waste and Abuse (FWA)

At Devoted we want to hear any potential violations. Every employee has an obligation to report any concerns about a potential breach in the Code of Conduct, Compliance concern and potential FWA without fear of retaliation. We are a company built on openness and trust. There are multiple ways to report a violation:

- Call our hotline. You can remain anonymous - (855) 292-7485
- Report it Directly to the Medicare Compliance Officer - sokane@devoted.com
- Report it Directly to Human Resources
- Report it to your Manager
- Email compliance@devoted.com

Compliance with Federal, State Laws and Regulations

Devoted is a Medicare contractor. We must properly administer the contract and hold our relationship with the Federal government to the highest standard. We strive to conduct day to day business activities in a way that fully complies with all the laws, regulations and

ethics rules that apply. We hold all First Tier Down Stream Related Entities (FDRs) involved in supporting Devoted Health's government contract to the same standards. The Federal government can impose substantial penalties for violations. Please refer to our Medicare Compliance plan, which outlines all the Laws and Regulations we must comply with as a Medicare contractor.

Fraud, Waste and Abuse Fraud

FWA isn't just harmful to Devoted but also the Medicare Trust Fund and ultimately our members. We are all responsible for protecting our company, coworkers, customers and business partners from Fraud, Waste and Abuse. Please refer to our internal FWA plan. Any questions regarding potential FWA violations must be reported.

Safeguarding Devoted Information

Devoted keeps confidential and proprietary information about our organization, health plans, our Members, associates, and all those who do business with us safe from inappropriate access, use or disclosure. Restricted information includes:

- Our member payment card information (credit card/bank account numbers)
- Member information, including: Name, address, date of birth, gender, Social Security or ID number, member ID number, Medicare unique identifier, financial, health or other information about the member that is not public
- Proprietary and nonpublic information about Devoted or its associates, customers, suppliers, and providers
- Any information that could help or harm our ability to meet our business goals
- System credentials (user ID and password).
- Confidential information about Devoted that is nonpublic sensitive information. If you are unsure if information is not for public consumption or sensitive, ask your manager or the Medicare Compliance Officer
- Comply with Devoted Health's Information Security Policy and Standards

Devoted employees are responsible for protecting such information. To ensure the security of such information, we should:

- Access, use, view or send confidential information within Devoted only if we are authorized and there is a valid and approved business reason to do so

- Do not reveal restricted, confidential or proprietary information to anyone outside Devoted unless required for legitimate business reasons and approved by management, internal legal counsel, or the Privacy Officer
- Share only the minimum information necessary to meet business needs
- Lock up paper documents when not in use
- Encrypt all restricted and confidential information sent or stored electronically outside of Devoted
- Comply with Devoted Health's Information Security Policy and Standards
- Properly dispose of all information when information is no longer needed

Respect in the Workplace

Devoted is committed to a safe and supportive work environment in which all employees have the opportunity to participate and contribute to the success of the business. We value diversity and collaboration. Individuals are respected for their skills, experience, and unique perspectives. As such, we:

- Provide equal opportunities for employees and applicants for employment without regard to race, color, religion, sex, pregnancy status, marital status, national origin, disability, age, sexual orientation, veteran status, genetic information, gender identity, gender expression, or any other factor prohibited by law. All employment is decided on the basis of competencies, merits and business need.
- Strictly prohibit unlawful discrimination and harassment of any kind, including sexual harassment, bullying and any other verbal, physical or visual acts that create an intimidating, hostile or offensive environment.
- Do not tolerate any threats, threatening language or any other acts of aggression or violence made toward or by any Devoted employee. Report any potentially dangerous situation to management immediately.
- Do not allow weapons of any kind on the premises.
- Do not tolerate any acts that substantially interfere with the ability of individuals to perform their job.
- Comply with all aspects of Devoted Health's Policy Against Unlawful Discrimination and Harassment.
- Promptly investigate and resolve any complaints.
- While alcohol may be consumed on the premises or served at company events, we expect Devoted employees to use good judgment and never drink to the point

where their professional conduct or any aspect of our Code is compromised. Illegal substances also compromise safety and are not permitted for use or sale by employees.

Avoiding Conflicts of Interest

Devoted expects all employees to conduct themselves and company business with the highest ethical standards and in a manner that is not improperly influenced by personal incentives. You must avoid any real and potential conflicts of interests. If a situation arises where a personal interest or activity could interfere or appear to interfere with your judgment or work performance for Devoted, you should avoid it.

While it is not possible to define all the circumstances and relationships that might create a conflict of interest, examples of areas to avoid include:

- Simultaneous employment — including Board seats and advisory roles, by another company that is a competitor, client-of or vendor-to Devoted.
- Business relationships — carrying on Devoted business with a company in which you, or a close relative, has a substantial ownership or interest; or holding a substantial interest in, or participating in the management of, a vendor to which Devoted makes sales or from which it makes purchases.
- Civic duties — participating in activities in a manner that divulges confidential Devoted information; voting/deliberating as an elected official on a decision affecting Devoted.
- Borrowing money — from customers or firms, other than recognized loan institutions, from which Devoted buys services or supplies.
- Accepting or giving substantial gifts (over \$50 cash value per individual) or excessive entertainment (over \$200) from/to an outside organization or agency.
- Speculating or dealing in materials, equipment, supplies, services, or property purchased by the company.
- Misusing privileged information or revealing confidential data to outsiders.
- Using your position at Devoted or knowledge of its affairs for personal gain.
- Engaging in practices or procedures that violate antitrust laws, commercial bribery laws, copyright laws, discrimination laws, campaign contribution laws, or other laws regulating the conduct of company business.
- Giving preferential treatment to family, friends or individuals you may be romantically involved with who work at Devoted.

Relatives and domestic partners may be hired and employed by the company if the individuals concerned will not work in a direct supervisory relationship, and the employment will not pose difficulties for management or morale. However, you must:

- Avoid participating in any management decisions that involve relatives or close friends.

If you face a situation where you are in doubt about how to proceed or there is the potential to create a personal incentive or the appearance of a personal incentive at the expense of Devoted, you should discuss immediately with your manager and Compliance.

Proper Use of Devoted Resources

Devoted provides a wide array of company resources to employees for use in performing day-to-day business activities. We are also transparent in sharing company information to support employee work efforts. All employees must use these resources professionally and responsibly in the best interest of Devoted.

- **Company Equipment and Communications** — Computers, including use of email and internet, slack/instant messaging, as well as phones and cell phones, are for business use. While we recognize employees may use these tools occasionally for non work out of convenience, we expect that you use your good judgment and that it never interferes with your ability to perform your job. Keep in mind that communications are not private and there should be no expectation of privacy.
- Any information (including personal information) on Company devices or systems is potentially recoverable by Devoted in the event of legal action or investigations.
- All use of company-provided communications systems, including e-mail and internet use (includes social media), as well as any other information Devoted employees create, transmit, or possess, must adhere to our Code of Conduct. This includes but is not limited to our policies of Unlawful Discrimination and Harassment; Restricted, Confidential and Proprietary Information; and Conflicts of Interest.
- **Social Media** — If you post something on your own blog, webpage, social networking, Twitter or similar site or on someone else's, and you mention Devoted and also express either a political opinion or an opinion regarding Devoted Health's actions that could pose an actual or potential conflict of interest with the Company, you must include a disclaimer. You should specifically state that the opinion expressed is your personal opinion and not the Company's position. Content must adhere to our Code of Conduct.

- Follow all IT Security Policies. If you lose your laptop, cell phone or think IT Security is compromised in any way, immediately report it to IT.
- Follow the PHI and Office Security Policies — Keep laptops and other company equipment secure. Adhere to building security entry process, wear your id badge while on the premises and register and host all Devoted visitors. You must properly handle PHI. Do not enter any protected health information in any system that is not approved by the company as HIPAA compliant. Immediately report any suspicious activity or potential breaches to the privacy officer.
- Financial Integrity — Use good judgment regarding company finances, including how you spend money, contracts you enter and adherence to internal Financial controls and Travel and Expense policies.
- All items such as Devoted manuals, reports, records and statements are the property of the company and must be kept at the company, unless removal has been properly authorized. Paper business records should be avoided whenever possible and shredded as soon as no longer needed.
- To maintain building security and in connection with any investigation, Devoted reserves the right to search company property such as desks, cabinets, or other storage areas and inspect items found inside such areas. Devoted also reserves the right to inspect any and all packages entering and/or leaving our premises.