Code of Business Conduct
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A Message from our CEO to the One Medical team

Dear Colleagues,

Every day, our patients trust that we will live up to our commitment to build a world-class primary care system for everyone that delivers the highest-quality care and service, affordably. We call this Real Life Care. In order to earn and maintain that trust, it’s important that we conduct business ethically, honestly, and fairly. We are committed to treating our colleagues at work and the people with whom we interact with respect and dignity.

Our Code of Business Conduct (“Code”) reflects these principles and applies to every one of us, regardless of our job titles. The Code is a valuable resource designed to give guidance on where to turn if you have questions on any compliance-related topic. The most critical part of any compliance effort is not the rules, but the people who take them to heart.

Each of us has a personal responsibility to ensure that business practices are conducted in a manner that reflects the highest standards of honesty and integrity. If you become aware of any situation that might represent a conflict with the Code, or that might violate applicable laws or regulatory requirements, you should report it.

We can only thrive if we inspire the confidence of patients, members, vendors, third-party payers, government oversight agencies, health systems, and other important partners. Your personal commitment is vital to that effort so that we can live our mission of providing the highest-quality care and service affordably to all the communities we serve.

Sincerely,

Amir Dan Rubin
President and CEO
One Medical
Taking compliance and ethics seriously

A key aspect of our success at One Medical stems from our commitment to serving our members while doing business with integrity. This commitment involves everyone in the One Medical family, and this Code applies to all employees working for our affiliated One Medical offices and for 1Life Healthcare (collectively “team members,” and together such entities are referred to throughout as “the Companies” or “Company”), as well as our respective officers, directors, temporary employees, and contractors (together “the One Medical team”). A fundamental part of being a member of the One Medical team is respecting and following this Code and our Company policies. Some of the Company policies are listed in this Code. You can find other policies and guidelines on our internal wiki site.

As part of the One Medical team, you should be aware of the legal and professional obligations related to your job and conduct yourself honestly and ethically in all your interactions.

Violations can create significant liability for our Company, and could threaten our ability to deliver high-quality patient care. Failing to abide by our policies may lead to termination of your relationship with the Companies. We’re counting on you to recognize potential problems and ask questions if you’re ever uncertain about anything.

Today and every day

It’s important for all of us to understand the interrelationship between the three concepts of compliance, ethics, and integrity:

Compliance
- Knowing the rules
- Following the rules as they have been given to you

Ethics
- Understanding the difference between right and wrong
- Choosing to do the right thing

Integrity
- Consistent application of doing the right thing
- Even when no one is looking
The actions of members of your immediate family, significant others, or other persons who live in your household (referred to in the Code as “family members”) also may potentially result in ethical issues to the extent that they involve the Companies’ 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 and result in a Code violation that’s attributable to you.

Consequently, in complying with the Code, you should consider not only your own conduct, but also that of your family members.

The Code is not intended to cover all circumstances or anticipate every situation.

If you encounter a situation that’s not specifically addressed by this Code, you should apply the overall philosophy of the Code to the situation, considering any guidance from more specific policies, if any, as well as your own common sense. If you’re still unsure, you should review the particular situation with your manager or someone from the Compliance, Legal, or People Experience teams. Their doors are open, and they’re here to help you.

“The most critical part of any compliance effort is not the rules, but the people who take them to heart.”
Our leaders are role models

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

- Read and understand the Code
- Embrace the Code and set an example as ethical leaders
- Maintain a workplace environment that’s supportive of the Code
- Seek guidance from your Legal, People Experience, or Compliance team members with questions about the Code

“As One Medical team members, we’re dedicated to building a world-class primary care system that delivers the highest-quality care and service affordably.”
Asking questions and report violations

Reporting possible violations

In addition to abiding by the Code’s principles, you also have an obligation to report any suspected violations of this Code, the law, or any of our other policies. We don’t expect you to conduct your own investigation — instead, we ask that you report a suspected violation immediately. Supervisors must promptly report any complaints or observations of Code violations to the Compliance team.

If you believe your supervisor has not taken appropriate action, you should contact the Compliance team directly.

How should you ask questions or report suspected violations? There are many resources available for you. Choose the one you’re most comfortable with:

- Your leader or anyone in senior management
- Any member of the Compliance team
- Any management member of People Experience, Finance, or Legal
- Our Compliance hotline

The Compliance hotline can be reached at (888-495-4384); international (800-014-8744). Your report through the Compliance hotline may be anonymous or you may leave your contact information. The Compliance team can be reached directly at compliance@onemedical.com. The HR team can be reached directly at hr@onemedical.com. You can also send a letter to the General Counsel at One Embarcadero Center, 19th Floor, San Francisco, CA 94111.

Non-retaliation and disciplinary action

It is important for you to understand that you can ask questions or report concerns without fear of retaliation. We will not retaliate — and will not tolerate retaliation — against any individual for filing a good-faith complaint or for participating in the investigation of any such complaint. Anyone who engages in any form of retaliation will be subject to disciplinary action, which may include termination of employment.

If you believe that you have been subject to retaliation as a result of reporting a suspected violation in good faith, you should report it immediately to any of the available resources listed in this section.

We commit to investigating all reported concerns promptly. If you report a suspected violation in good faith and you are not engaged in the questionable conduct, we’ll endeavor to keep our discussions with you confidential to the extent reasonably possible and appropriate. Information regarding a reported concern will be shared only with those on a “need to know” basis or to comply with applicable laws, policies, or regulations.
Whistleblower Policy

In order to promote One Medical’s culture of compliance and to facilitate open and honest communication within the company around our business practices, we have implemented a Whistleblower policy. We encourage the reporting of good faith complaints, so that we can correct any potential issues. For further details see the [Whistleblower Policy](#).

With respect to any complaints or observations of violations that may involve accounting, internal accounting controls and auditing concerns, under the Company’s Whistleblower Policy, the Compliance team shall promptly inform the Audit Committee, and the Audit Committee shall be responsible for supervising and overseeing the inquiry and any investigation that is undertaken. If a potential violation is reported via the confidential hotline or email address as provided under the Whistleblower Policy, the Audit Committee will be notified automatically and directly.
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’ve created policies and practices to support this goal. For further details, see the Harassment and 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

One Medical is a human-centered organization that aspires to provide world-class, culturally competent healthcare to all. We embrace diversity, and we’ve worked to create an inclusive environment where both our similarities and differences are valued and celebrated. We’re committed to building teams that reflect the diverse communities and populations we serve, both now and in the future.

At One Medical, diversity includes gender, race, ethnicity, sexual orientation, disability, religion, and age, but it doesn’t 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’re interacting with our teammates, business partners, or One Medical members and patients.
A discrimination and harassment-free work environment

All One Medical 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 from One Medical team members, patients, business partners, or visitors. If you witness, are informed of, or experience discrimination or harassment, please report it immediately to any of the available resources listed previously in Reporting Possible Violations.

A safe and healthy environment

We have the right to a 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 One Medical 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 patients, One Medical team members, 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 on owned or leased Company property or at Company events, regardless of whether someone possesses a license to carry a concealed weapon, is prohibited. If you have a concern for your own or someone else’s safety, please contact People Experience at hr@onemedical.com. Workplace safety also extends to our physical work environment. All One Medical team members are responsible for using safe work practices, following all policies and procedures, and assisting in maintaining a safe work environment. Leaders are responsible for ensuring that all safety and health policies and procedures are clearly communicated, understood, and adhered to by all One Medical team members. That’s why it’s important that you identify and promptly report any condition that could create a physical hazard to People Experience at hr@onemedical.com. For further details, refer to the Injury and Illness Prevention Program.

Today and every day

We strive to create a safe and respectful workplace where each of us is committed to maintaining an employment environment free from any form of discrimination or harassment.
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

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 they can’t trust us, they may be reluctant to provide us with aspects of their history or medical conditions, which could impact how we provide treatment. Therefore, every One Medical team member must protect our members’ privacy in accordance with One Medical’s Privacy Policy. Further, consistent with the Health Insurance Portability and Accountability Act (HIPAA), every One Medical team member is required to protect and maintain the confidentiality of all PHI and participate in regular, ongoing HIPAA training. Except in limited circumstances, HIPAA permits the access, use, and disclosure of PHI without patient authorization for treatment, payment, and healthcare operations, in addition to disclosures authorized by the patient.

Every One Medical team member needs to adhere to One Medical 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.

For more detailed information regarding our comprehensive HIPAA program, visit our Compliance Program page and read the HIPAA Privacy and Security document.
To protect our patients’ privacy, keep these best practices in mind:

- Access, use, and disclose only the minimum amount of PHI necessary to perform your job
- Don’t discuss PHI with others who do not have a job-related need to know
- Don’t share or post IDs or passwords
- Log off or lock computers when they’re not in use
- Visually protect PHI, including 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
- Notify your leader or Compliance or Legal team about any privacy concerns or potential privacy policy violations

**Today and every day**

Ask yourself...

- Do I always treat patients with respect and dignity?
- Do I respect the privacy rights of our patients?
- Do I protect the confidentiality of patient medical and financial information?
- Do I obtain or verify written authorization prior to releasing information?
- Do I avoid discussion of PHI in public areas?
- Am I careful not to leave patient files, reports, or other information in areas that could be viewed by the public or by someone who doesn’t have a need to see it?
Protecting confidential information

In addition to protecting PHI, we protect other Company Confidential Information. Company Confidential Information means any information that we don’t plan or want to make publicly known at a given time.

Company Confidential Information may include (without limitation):

- Technical, business, financial, and marketing information, forecasts, strategies, and other types of business information, including patient 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 the Company or a third party — to which you may have access during the course of your work.

Your obligations to safeguard Confidential Information are in effect during, and continue even after, your employment or engagement with the Companies.

We also respect the rights of other people and companies to protect their confidential information and trade secrets. Third Party Confidential Information is information owned or controlled by a Third Party that is entrusted to us under an obligation of confidentiality. We need to protect Third Party Confidential Information in the same way as we protect our own, using nothing less than a reasonable standard of care.

We also respect confidentiality obligations to previous employers. Please do not use or reveal to One Medical team members any information that might reasonably be considered confidential or trade secret information of a former employer.

Today and every day

- Use Confidential Information only as permitted
- Identify and label Confidential Information accurately
- Collect, maintain, and store Confidential Information responsibly
- Only share Confidential Information with people authorized to receive the information
- Do not disclose Confidential Information without appropriate approvals
- Do not forward Confidential Information to your personal email or data storage accounts
Insider trading

In our various roles we are exposed to information about our Company, and sometimes information about other organizations with which we do business. All non-public information about the Company or about companies with which we do business is considered confidential information. To use material non-public information in connection with buying or selling securities, including “tipping” others who might make an investment decision on the basis of this information, is not only unethical, it is illegal. You must exercise the utmost care when handling material inside information. Please refer to the Company’s Insider Trading Policy for more detailed information.

What is inside information? Non-public information is any information that the Company has not disclosed or made generally available to the public. Examples include information related to:

- Employees
- Contracts
- Strategic and business plans
- Major management changes
- New product launches
- Mergers acquisitions
- Technical specifications
- Pricing
- Proposals
- Financial data
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 trademarks, copyrights, software code, business process, workflows, tools, trade secrets, patents, concepts, and designs. We expect you to protect our intellectual property and only use it or disclose it in accordance with our policies or guidelines.

Maintaining the confidentiality of our trade secrets and other Confidential Information is an important element of protecting the Company’s intellectual property. As described in the Confidential Information and Inventions Assignment Agreement that you signed as a team member, your obligations to safeguard such information continue even after you are no longer a team member of or engaged by the Company.

We also believe that it’s important to respect the intellectual property rights of third parties. All software and technology used by One Medical team members to conduct business must be appropriately licensed and used in accordance with our information technology policies. Making or using unauthorized copies of software or devising ways to obtain unauthorized access to software services constitutes copyright infringement and may expose you and the Companies to civil and criminal liability.

Works published in hard copy or on the Internet, such as white papers, product information, reference works, newsletters, blogs, imagery, graphics, or photographs are generally protected by copyright. Do not make copies of these materials or incorporate them into Company products materials without first consulting the Legal team.
Complying with laws and regulations related to our business

Throughout the Code, we refer to various requirements and standards to which we must adhere. Medical services providers are subject to various laws and regulations specific to the delivery of healthcare services. Our primary areas of concern are Protected Health Information (discussed above), Fraud, Waste, and Abuse, Kickbacks, and Self-Referrals. The following are a sampling of key concepts that affect our business:

International business laws

Although our Company does not do business outside of the United States, there may be situations in which we do business with individuals or companies in other countries. In these situations we are expected to comply with laws that prohibit bribery and corruption. In our dealings with individuals, companies, or government officials, you should never offer or accept anything of value in order to get or keep business. In addition, we expect all One Medical team members 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 our 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 company transactions being properly recorded;
- U.S. Embargoes, which generally prohibit U.S. companies, their subsidiaries and their employees from doing business with countries, or traveling to, subject to sanctions imposed by the U.S. government (currently, Cuba, Iran, North Korea, Sudan, Syria and the Crimea Region of Ukraine), 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 prohibits transfers of U.S.-origin items to denied persons and entities; and
- Antiboycott 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 as to whether an activity is restricted or prohibited, seek assistance from our legal team before taking any action, including giving any verbal assurances that might be regulated by international laws.
Antitrust

We follow the antitrust and fair competition laws and compete fairly. Some agreements have the potential to limit free and open competition, so we must never enter into an agreement or understanding, whether formal or informal, that:

- are with a competitor and harms competition or customers, by price fixing or allocates customers, territories or contracts;
- establishes or fixes the price at which a customer may resell a product; and
- creates or maintains a monopoly or attempted monopoly through anti-competitive conduct.

Certain kinds of information, such as pricing, production and inventory, should not be exchanged with competitors, regardless of how innocent or casual the exchange may be and regardless of the setting, whether business or social. It is acceptable to collect competitive intelligence through publicly available information, for example: publicly available filings with government agencies; public speeches of company executives, annual reports, news and trade journal articles and publications.

Antitrust laws impose severe penalties for certain types of violations, including criminal penalties and potential fines and damages of millions of dollars, which may be tripled under certain circumstances. Understanding the requirements of antitrust and unfair competition laws of the various jurisdictions where we do business can be difficult, and you are urged to seek assistance from your supervisor or the legal team whenever you have a question relating to these laws.

Fair dealing

We strive to outperform our competition 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. When obtaining information about competitors, we should use public or other permitted sources and be honest about who you are and who you work for. We should never gather or ask someone else to gather information using illegal activity. Examples of acceptable information sources would be: publicly available filings with government agencies, public speeches of company executives, annual reports, news and trade journal articles and publications. If information is obtained by mistake that may constitute a trade secret or other confidential information of another business, or if you have any questions about the legality of proposed information gathering, you must consult your manager or the Compliance Team.

We are expected to deal honestly and fairly with our patients, partners, and vendors. We want to create positive business relationships that never take unfair advantage of anyone by misleading or deceiving them. Always be truthful about our Company and never make any claims that we cannot substantiate.

Employees involved in procurement have a special responsibility to adhere to principles of fair competition in the purchase of products and services by selecting suppliers based exclusively on normal commercial considerations, such as quality, cost, availability, service and reputation, and not on the receipt of special favors.
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.

- Knowingly billing for services not furnished or supplies not provided, including billing Medicare for appointments that the patient failed to keep
- Billing for non-existent prescriptions

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

- 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.

- 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 his/her clinical services is ultimately responsible for his/her documentation and coding practices. We will provide oversight and learning opportunities to help 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 False Claims Act prohibits a provider or individual person 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 General Compliance + Fraud, Waste and Abuse Training for more information on the Federal False Claims Act, Health Care Fraud Statute, Criminal Fraud, and more.

As with all of our policies, we encourage you to report any concerns relating to potential violations of these laws. We will not tolerate retaliation against anyone who reports concerns to the government or files a claim with the government related to the submission of false claims, and you may not be fired, demoted, threatened, or harassed by the Companies in retaliation for doing so.

Kickbacks and referrals

Kickbacks: State and federal anti-kickback statutes prohibit medical providers and related businesses from offering, paying, seeking, or accepting any form of payment or anything of value, in return for or to induce the referral of any patient or healthcare business. In general, these laws prohibit kickbacks, bribes, fee-splitting, or rebates in exchange for referrals of patients or other healthcare business.

Kickbacks generally involve receiving or making payments in exchange for patient referrals, and fee-splitting arrangements generally involve splitting the physician’s fee to the patient for healthcare services between the physician and a third party.
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. Examples include offering cash or other items of economic value for patient referrals, or giving discounts for patient referrals.

**Self-referrals:** The Federal “Stark” law, also known as the “self-referral law,” generally prohibits a physician from referring Medicare patients for certain designated health services, or ordering these specified services for Medicare patients from a provider where the physician has a compensation or ownership arrangement with that specified services provider, unless the arrangement meets an exception. For example, a physician generally may not refer a Medicare patient for laboratory services to a lab that the physician owns unless the arrangement meets an exception. Similar prohibitions apply to Medicaid. The exceptions are complex and include, for example, certain managed care arrangements, employment arrangements, and in-office ancillary services within group practices, where specific criteria apply. Some states also have adopted their own versions of self-referral laws.

**Controlled substances**

Most licensed providers employed by One Medical 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 prescriptions 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 by One Medical team members is strictly prohibited. If you learn about any unauthorized handling of controlled substances, you should provide the information immediately to your manager, a member of clinical management, a member of the Compliance or People Experience team, or through any of the available resources listed previously in Reporting Possible Violations.

**Does this sound complex? That’s because it is.**

You should refer any questions or concerns to the Legal team.
Avoiding conflicts of interest

Understanding conflicts of interest

A conflict of interest occurs when a relationship, influence, or activity impairs, or even gives the appearance of impairing, a person’s ability to make objective and fair decisions in the performance of his/her job. In other words, you should not place yourself in any situation that might force you to put your personal or financial interests ahead of the interests of the Company. You may be involved or want to get involved in work or other activities outside of your work here at One Medical, certain outside activities may create or appear to create a conflict of interest with the Company. If you would like to engage in a work activity outside of One Medical, fill out the Outside Activity Form to ensure that the activity will not create a conflict of interest. In certain instances, conflicts of interest may arise despite your best efforts to avoid them. If this happens, you should promptly and fully disclose it to your leader, the Compliance Hotline, or a member of the People Experience or Compliance teams. Specific facts and circumstances vary, but the following are examples where there’s potential for a conflict of interest. If any of these apply to you, you should discuss the situation with your leader:

- Employment by a competitor or potential competitor while employed by a One Medical company or 1Life Healthcare
- Direct or indirect ownership of, or substantial interest in, a company that is a competitor or a supplier of goods and services to a One Medical company or 1Life Healthcare
- Personal acceptance of non-deminimus (more than $15) gifts, payments, or services from those doing business, or seeking to do business, with a One Medical company or 1Life Healthcare
- Serving as a director, officer, consultant, or other key role with a company doing (or seeking to do) business with or competing with a One Medical company or 1Life Healthcare
- Hiring or contracting with family members or friends to provide goods and/or services to a One Medical company or 1Life Healthcare
- 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 us

Business courtesies, gifts: business partners and patients

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 don’t 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 One Medical team members.

Accepting or giving common, non-cash courtesies is OK, 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’s 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 (“OIG”) 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 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.

**Corporate opportunity**

You may not take personal advantage of Company 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 Compliance Officer. In short, you may not use your position with us or corporate property or information for improper personal gain.

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**Ask yourself:**

- If I receive a gift from a business partner, do I ensure that the gift is of nominal value and does not influence my decisions related to that partner?
- Do I refrain from offering gifts or courtesies to business partners with the understanding or intent to give or receive business in return?
- Do I contact my leader or a member of the Compliance or Legal Team when I am not sure if I can keep a particular gift that I have been offered?
Using assets and resources appropriately

We expect One Medical team members to care for and responsibly use our Company assets, which include our computers, other equipment and technology resources, files, and work supplies. If you use Company equipment at your home or outside of a Company office, take precautions to protect it from theft, damage, or unauthorized access, just as if it were your own. If you leave your employment for any reason, you must immediately return all One Medical or 1Life Healthcare resources, assets, and equipment in normal operating condition.

Privacy and your use of company resources

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

For further details, please consult the Acceptable Use Policy.

Use of email and other forms of electronic communication

When using Company 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 Company-related should be minimized at the workplace during business hours.
Communicating appropriately

Advertising and marketing

We strive to comply with all applicable policies and laws pertaining to the advertising and marketing of our services. This means that we must take steps to ensure that our advertising and marketing is truthful and not deceptive. We should understand and follow consumer protection and other regulations.

Media requests

Unless you are an employee specifically designated to speak with the media on behalf of One Medical or 1Life Healthcare, you should refer all inquiries from the media or other third parties to our Public Relations team. Any government inquiries about the Company should be referred to the Legal team.

Social media

If you share Company information in any public forum, such as conferences, industry events, or social media sites, blogs, or any other online forum, you should be careful not to disclose confidential, private, or proprietary information about the Company or its members and you should ensure that the content of the postings is consistent with the Code and other Company policies. Do not identify yourself as speaking on behalf of the Company when linking to a Company website from your personal blog, website, or other social networking site, and do not associate the Company with your own personal opinion. For further guidelines, see our Social Media Policy.

Law enforcement / government

For subpoenas pertaining to medical records of One Medical patients, please follow the Subpoena Policy.

For all other Company documents or property that may be requested by a government or law enforcement officer, you must promptly notify and consult with the Legal team prior to providing any Company documents or property. In all matters except where otherwise required by law, you are required to notify the Legal team before speaking to government or law enforcement officials regarding the Company.
We support community involvement

At One Medical, 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 endorsement by One Medical or 1Life Healthcare, or create a conflict of interest. No Company funds, equipment, facilities, or assets may be used to support a political party, candidate, or holder of any government position.

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.

It is our policy to conduct our business in an environmentally responsible way that minimizes environmental impacts. 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.
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’re 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 Company 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 Company 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 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 should strive to ensure that our financial disclosure is accurate and transparent and that our reports contain all of the information about the Company 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:

- no Team Member may 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;

- all Team Members 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

- no Team Member should 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.

**Waivers**

Any waiver of this Code for executive officers (including, where required by applicable laws, our principal executive officer, principal financial officer, principal accounting officer or controller (or persons performing similar functions)) or directors may be authorized only by our Board of Directors or, to the extent permitted by the rules of Nasdaq and our Corporate Governance Guidelines, a committee of the Board and will be disclosed to stockholders as required by applicable laws, rules and regulations.

**Today and every day**

Our core values dictate not only high standards of care for the people we serve, but a strong commitment to legal and ethical conduct.
Amending the Code

We’re committed to regularly reviewing and updating our policies and procedures, including this Code. The most current version of the Code is always available on the One Medical wiki page, and we encourage you to review it periodically to stay aware of any changes.

One Medical business ethics and compliance resources

Compliance is everyone’s responsibility and we all have an obligation to uphold the ethical standards that support the mission of One Medical. If you encounter a situation or are considering a course of action and its appropriateness is unclear, discuss the matter promptly with your supervisor or the Compliance Team; even the appearance of impropriety can be very damaging and should be avoided. If you observe or are aware of any actions or behavior that violates, or you think may violate this Code of Business Conduct, please report the issue as soon as possible to your supervisor, HR, Compliance, or appropriate One Medical leadership. We also encourage and expect you to report if you feel you are being pressured to compromise standards that may lead to a potential violation. We want to correct these potential issues before they become a violation of law or a risk to our patients, team members, or the reputation of One Medical.

There are a number of options for reporting violations or raising concerns, which include:

- Your supervisor
- Compliance
- HR
- Reporting online or on the anonymous hotline

Every report made to the Compliance Team or the anonymous hotline will be confidential. You can remain anonymous, but we encourage you to identify yourself to facilitate communication. If you identify yourself, the Compliance team will make every effort to keep your identity confidential. Whether you choose to speak with your supervisor or the Compliance team, you should do so without fear of any form of retaliation. We will take prompt disciplinary action against any employee who retaliates against you. We do not tolerate retaliation in any form against anyone who in good faith reports suspected violations or unethical behavior or who participates in an investigation regarding suspected violations or unethical behavior.

Compliance team and wiki page

Compliance Incident Reporting Form

US Compliance Incident Reporting Hotline: 888-495-4383

International Compliance Incident Reporting Hotline: 800-014-8744