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, report it using any of the resources listed in this Code.

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
Chair & CEO & President
One Medical
Taking compliance and ethics seriously

A key aspect of our success stems from our commitment to serving our members while doing business with integrity. This commitment involves everyone on the One Medical team. This Code of Business Conduct (“Code”) applies to all employees (“team members”), officers, directors, temporary employees, and contractors (collectively, “you” and “your”) working for 1Life Healthcare or our affiliated One Medical offices (collectively, “we”, “us” and “our”). A fundamental part of being a member of the One Medical team is respecting and following this Code and our policies. Some of our policies are listed in this Code. You can find other policies and resources on our Compliance Program page.

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

Violations can create significant liability for us, and could threaten our ability to deliver high-quality patient care. Failing to abide by this Code or our policies may lead to termination of your relationship with us.

We are counting on you to recognize potential problems and ask questions if you’re ever uncertain about anything.
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 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 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 family members.

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

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, and use common sense. If you are still unsure, you should review the particular situation with your manager (“leader”) or a member of the Compliance, Legal, or People Experience teams. See “Asking questions” below. Their doors are open, and they are 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 is important that leaders:

- Read and understand this Code
- Embrace the Code and set an example as ethical leaders
- Maintain a workplace environment that is supportive of the Code
- Seek guidance from members of the Compliance, Legal, or People Experience teams

“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 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 Compliance, Legal, or People Experience teams
- Our Compliance hotline by phone at 888-495-4384 (international, 800-014-8744) or through the web here

Reporting concerns

In addition to abiding by this Code’s principles, you also have an obligation to report any suspected or actual violations of this Code, the law, or our policies (collectively, “concerns”). We do not expect you to conduct your own investigation. Instead, we ask that you report the concern immediately. Leaders must promptly report any concerns they receive from you. If you believe your leader has not taken appropriate action in response to a concern that you reported to your leader, you should report it.

How should you report concerns? There are many resources available for you. Choose the one that makes you most comfortable:

- Your leader or any leader in senior management
- Any member of the Compliance team, directly at compliance@onemedical.com
- Any member of the Compliance Team by completing and submitting the Compliance Incident Reporting Form
- 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 Compliance hotline, by phone at 888-495-4384 (international, 800-014-8744)
- Our Compliance hotline, through the web-based reporting form found here
Anonymous reporting and confidentiality

Your reports to the Compliance hotline may be anonymous or you may leave your contact information. 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.

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

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 discharge, demote, discriminate, or tolerate relation against you 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 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 report it immediately.

We commit to investigating all reported concerns promptly. If you report a concern in good faith and you are not engaged in the questionable conduct, we will 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.

For further information, including how to contact the Compliance Officer, see our Compliance Program page.
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, you have two methods of reporting it. First, we encourage you to report it to any of the available resources listed above under “Reporting 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 correct any potential issues. With respect to any reported complaints that may involve accounting, internal accounting controls, or auditing concerns, the Audit 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 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. Leaders are responsible for ensuring that all safety and health policies and procedures are clearly communicated, understood, and adhered to by all team members. It is 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 & 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

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 cannot 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, 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 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. For more detailed information regarding our comprehensive HIPAA program, visit our Privacy Program page.

You 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 your role
- 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
- 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):

- 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 us or third parties — to which you may have access during the course of your relationship with us.

Your obligations to safeguard confidential information are in effect during, and continue after, your relationship with us ends. We respect the rights of other persons or organizations (collectively, “third parties”) to protect their confidential information. “Third-party confidential information” is information owned or controlled by third parties that is entrusted to us under an obligation of confidentiality. You must protect third-party confidential information in the same way as you protect our confidential information, using nothing less than a reasonable standard of care.

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**

In our various roles we are exposed to information about us, and sometimes information about other organizations with which we do business. All non-public information about us or about organizations with which we do business is considered our 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 non-public information. Please refer to our Insider Trading Policy for more detailed information on our trading policies and what information may be considered non-public information. 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 trademarks, copyrights, software code, business processes, 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 confidential information is an important element of protecting our 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 us.

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. Making or using unauthorized copies of software or devising ways to obtain unauthorized access to software services constitutes copyright infringement and may expose us and you 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 our products materials without first consulting a member of the Legal team.
Complying with laws and regulations related to our business

Throughout this Code, we refer to various requirements and standards to which we must adhere. Medical service providers are subject to various laws and regulations specific to the delivery of healthcare services. Our primary areas of concern are Privacy; Fraud, Waste, and Abuse; Kickbacks; and Self-referrals. The following are a sampling of key concepts that affect our business:

International business laws

Although we do not do business outside of the United States, there may be situations in which we do business with individuals or organizations in other countries. In these situations we are expected to comply with laws that prohibit bribery and corruption. In our dealings with individuals, organizations, or government officials, you should never offer or accept 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, 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.
Antitrust

We believe in competing fairly with our competitors and fostering free and open competition. Some agreements have the potential to limit free and open competition. You are prohibited from entering into them, whether in formal writing or informal understanding. These include agreements:

- With a competitor that harm competition or customers, for example, by fixing prices, fixing terms of sale, fixing production output, rigging bids, or allocating customers, territories, or contracts;
- That establish or fix the price at which a customer may resell a product; or
- That create or maintain a monopoly or attempted monopoly through anti-competitive conduct.

In addition, attempts to discriminate in prices or terms of sale among our customers, or to otherwise restrict the freedom of our customers to compete, may sometimes be illegal. Legal issues may also arise if we refuse to deal with certain customers or competitors.

Depending on the business justification and effect on competition, other practices not involving competitors may result in civil violations of the antitrust and competition laws. These practices include:

- Exclusive dealing
- Bundling/package offerings
- Resale restrictions, and
- Selective discounting

In addition, 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 our 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.

If you have a question about any of these laws, seek assistance from a member of the Legal team before taking any action.
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 are committed to engaging in open and fair procurement activities regardless of nationality or the size of the transaction. Suppliers are selected on a competitive basis based on qualitative and qualitative 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, is reached before work begins.

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 non-existent prescriptions

Waste occurs when there is no intent to deceive for a 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 his/her clinical services is ultimately responsible for his/her 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

State and federal 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 Self-referral Law (also known as the Stark 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.

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

**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 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 is strictly prohibited.
Avoiding 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 our interests. You may be involved or want to get involved in work or other activities outside of your work here, certain outside activities may create or appear to create a conflict of interest with our activities. If you would like to engage in an outside work activity, 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. 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 us
- Direct or indirect ownership of, or substantial interest in, a company that is a competitor or a supplier of goods and services to us
- Personal acceptance of more than de minimus (more than $15) gifts, payments, or services from those doing business, or seeking to do business, with us
- Serving as a director, officer, consultant, or other key role with a company doing (or seeking to do) business with or competing with us
- Hiring or contracting with family members or friends to provide goods and/or services to us

- 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
- 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 and gifts: business partners

We deal with many business partners (e.g. suppliers, consultsnts, 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 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 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 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.

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.

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.
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.

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.

Media requests

Unless you are an employee specifically designated to speak with the media on our behalf, you should refer all inquiries from the media or other third parties to our Public Relations team. For further guidelines, see our Public Relations page.

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 create a conflict of interest. None of our funds, equipment, facilities, or assets may be used to support a political party, candidate, or holder of any government position.

Social media

If you share our 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 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.
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 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.
**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, 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.

**Amending this Code**

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

**Our ethics and compliance program resources**

See our [Compliance Program page](#) for access to 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 Compliance Officer.

As a reminder, you may ask questions or report concerns using any of the following resources:

- **Your leader or any leader in senior management**
- **Any member of the Compliance team, directly at** [compliance@onemedical.com](mailto:compliance@onemedical.com)
- **Any member of the Compliance Team by completing and submitting the** [Compliance Incident Reporting Form](#)
- **Any management member of the Legal team**
- **Any management member of the People Experience team, directly at** [hr@onemedical.com](mailto:hr@onemedical.com)
- **A letter to the General Counsel at One Embarcadero Center, 19th Floor, San Francisco, CA 94111**
- **Our Compliance hotline, by phone at 888-495-4384 (international, 800-014-8744)**
- **Our Compliance hotline, through the web-based reporting form found** [here](#)

Thank you for your dedication to ethics and compliance as we pursue Real Life Care.