



# **hims & hers**

code of conduct

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### **A message from our CEO to the Hims & Hers Team**

Dear Team:

Hims & Hers is a market leader in modernizing and increasing access to healthcare, and we serve as the first critical touchpoint for many people who have felt underserved or forgotten by our health system. We are committed to doing business in a responsible and ethical manner, with a focus on respecting the needs of the individual, our communities, the society and the environment.

We all have a responsibility to act with integrity while meeting our responsibilities. Hims & Hers' reputation is one of its most valuable assets and we have an obligation to protect it, but more importantly, we have an obligation to our customers and stakeholders to act ethically and in furtherance of our mission, purpose, and values.

As you go about your day-to-day work, I encourage you to refer to our Code of Conduct. The Code of Conduct was designed to help establish appropriate practices for colleagues looking for the right solutions to ethical questions or issues and in obtaining additional guidance when the correct path is not clear.

The Code of Conduct is an excellent place to start, but it is not a substitute for good judgment, nor can it address every issue. So, where there is no written rule or precedent, decisions need to be made ethically and responsibly, and consistent with our Company's mission, purpose and values. In doing so, we will continue to earn the trust that our communities have placed in us.

It is up to each of us to live by our core values and ensure that our culture is developed and maintained. Together, we can continue to build Hims & Hers as an ethical business leader and a great place to work.

Andrew Dudum

CEO  
Hims & Hers



# introduction

The Hims & Hers (“Company”) Code of Conduct (“Code”) is one of the ways we put our Company values and guiding principles into practice. The purpose of this Code is to deter wrongdoing and to promote: (i) honest and ethical conduct, including the ethical handling of actual or apparent conflicts of interest between personal and professional relationships, (ii) full, fair, accurate, timely and understandable disclosure in our Securities and Exchange Commission (“SEC”) reports and other public communications, (iii) compliance with applicable laws, rules and regulations, (iv) prompt internal reporting of violations of this Code to appropriate persons identified in this Code and (v) accountability for adherence to this Code.

The Code applies to all employees, officers, temporary employees, and contractors (collectively, “you” and “your”) working for Hims & Hers or our affiliates (collectively, “we”, “us” and “our”). Failure to read and/or acknowledge the Code does not exempt an individual from their responsibility to comply with this Code, applicable laws, regulations, and all Hims & Hers policies and guidelines that are related to their job and/or duties.

As part of the Hims & Hers team, it is your responsibility to be aware of the legal and ethical requirements related to your job function and to conduct yourself with honesty,

integrity and respect for the law in all of your business interactions.

Hims & Hers leaders, including managers and executives, must also lead by example and demonstrate their understanding of the Code, Company policies and procedures and applicable laws and regulations by taking proactive measures to facilitate a culture of integrity across our Company’s operations. Leaders must offer support and guidance about the Code to their teams where needed and direct any unresolved questions or concerns to Compliance. Leaders must also ensure that employees who raise concerns or report potential compliance violations are offered respect and support and that no retaliation is taken against them.

When faced with tough decisions that may affect the reputation of Hims & Hers, use this Code as your guide, or reach out to your manager or Legal. Legal has a team dedicated to compliance that can help you. If you have a specific compliance question or concern, email [compliance@forhims.com](mailto:compliance@forhims.com).

Working together, we can ensure that we uphold our Company’s values and guiding principles every step of the way.

## acting with integrity

We expect everyone at Hims & Hers to embody the Company's values and integrity as we work together to modernize healthcare for the communities we serve.

In most situations, our values and integrity will guide us to the right decision. However, we must always keep in mind how our actions affect the credibility of our organization as a whole. For this reason, our business ethics must reflect the values and standards of conduct outlined in this Code. If you violate the Code, ignore another team member's misconduct or pressure someone else to violate the Code, the impact could harm Hims & Hers' reputation, damage the quality and safety of our products and services, compromise our financial health and decrease customer trust in our brand.

You are obligated to follow the Code and report, in good faith, any violations or potential violations of this Code, any of Hims & Hers' internal policies or procedures, or any applicable laws or regulations. If you have a question or wish to report questionable behavior and/or a possible violation of the Code, any of Hims & Hers internal policies or procedures, or any applicable law or regulation, you should promptly:

- Raise the concern to your manager, Human Resources, Legal or Compliance, or
- Raise the concerns via the Hims & Hers Compliance Helpline, where team members may have the option of reporting concerns on an anonymous basis, consistent with our Compliance Reporting Policy.

Hims & Hers will handle all inquiries discreetly and make all appropriate efforts to maintain the confidentiality to the extent permitted by law of anyone requesting guidance or reporting questionable behavior and/or possible violation. Any action Hims & Hers takes will be prompt, fair and consistent and may involve disciplinary action

up to and including employment termination. If your actions violate the law, additional legal consequences may occur that could impact you, Hims & Hers, and others, including civil penalties, criminal prosecution, fines and even jail time.

Hims & Hers prohibits retaliating against anyone for raising a legal or ethical concern or cooperating with an investigation. Retaliation also can be against the law, leading to potential civil liability and criminal penalties. No one may seek revenge against, or try to "get even" with, any colleague or individual who makes a good faith report, regardless of who is implicated. We take retaliation very seriously. Reported incidents of retaliation will be investigated and appropriate disciplinary action taken, up to and including termination of the retaliator's employment. Any employee who feels like they have been a victim of retaliation, or been subjected to any action that discourages making further or future reports of questionable behavior, should submit a report following the process outlined above.

Compliance with both the letter and spirit of all laws, rules and regulations applicable to our business is critical to the Company's reputation and continued success. All Hims & Hers employees must respect and obey the laws of the cities, states and countries in which we operate and avoid even the appearance of impropriety. Although employees are not expected to know all of the details of these laws, we expect you to use good judgment and common sense and to ask for advice when you are uncertain.

## working together

### **We are committed to diversity, equity and inclusion.**

We celebrate our unique qualities and seek to establish an inclusive environment where we champion equity across Hims & Hers and everyone feels comfortable bringing their whole selves to work.

We believe that everyone matters and that every person should be seen and heard. For this reason, we are committed to building a team that reflects the unique perspectives, life experiences and varying backgrounds of the diverse populations that make up our customer base. We also strive to ensure this same diversity, equity and inclusivity with our business partners and suppliers.

### **We treat employees fairly and with respect.**

We value everyone and require that all employees, business partners, and customers be treated with dignity and respect. We prohibit discrimination or harassment on the basis of race, ethnicity, age, role, gender, sexual orientation, gender identity, gender expression, transgender status, ancestry, marital status, dependents, pregnancy status, disability, medical condition, religion, veteran status, political views or any other characteristics protected by law. This includes when making hiring, promotion, reward, benefit, training, or any other determinations which must be based on merit and qualifications directly related to job performance competence. We are also committed to making reasonable accommodations to meet our obligations under applicable laws protecting the rights of the disabled.

We prohibit discrimination, harassment – which may be of a physical, sexual, verbal or written nature – and bullying. Conduct such as making offensive or explicit jokes or insults, displaying, emailing, texting, or otherwise distributing offensive material of an explicit nature, misusing personal information, creating a hostile or intimi-

dating work environment, isolating a colleague or spreading malicious rumors about a colleague will not be tolerated. If you believe you've been discriminated against, harassed, or bullied by anyone at or affiliated with Hims & Hers, we encourage you to report the incident to your manager, Human Resources or the Hims & Hers Compliance Helpline. Managers who learn of such incidents should report them to Human Resources also. Human Resources will investigate any complaints and take appropriate action.

### **We protect employee health and safety.**

Hims & Hers values the safety of our employees, customers, and contractors. We are committed to providing a clean, safe, secure, and drug-free working environment for every team member. In fulfilling this commitment, Hims & Hers will provide and maintain a safe and healthy work environment that complies with applicable occupational health and safety laws and regulations and strive to continuously enhance our performance in these areas.

We all have a role to play in these health and safety endeavors. You have a responsibility to continuously engage in maintaining and improving safety by following safety and health rules and practices and by reporting accidents, injuries and unsafe conditions, procedures, or behaviors to your managers and Human Resources when they occur. Hims & Hers managers are responsible for ensuring continued adherence to our established safe work procedures and policies by providing team members with the required training, continual guidance, supervision, and evaluation in the safe completion of their job tasks and the use of safety materials. This, in conjunction with every employee's commitment to promote and abide by safe work practices, will ensure consistency in our safe work practices.

We are committed to a workplace free from violence. We do not tolerate threats, intimidation, aggressive behavior,

physical harm or other violence of any kind. Even if allowed by law, weapons of any kind, including firearms, on owned or leased property or at Company events is prohibited. If you have a concern regarding safety or the safety of another employee, you should contact Human Resources.

At all levels of Hims & Hers, our shared safety obligation to our employees, customers and communities shall be an ongoing driver for the success of our business. Safety is a critical component of our commitment to delivering exceptional service.

**We protect the environment and are committed to enhancing sustainability.**

We are committed to conducting our business in an environmentally responsible and sustainable manner, and we are committed to complying with all applicable environmental laws. For this reason, sustainability is integrated and integral into the way we do our business. It is anchored in our corporate principles and forms the foundation of our business model. We address our economic, social and environmental challenges holistically to create long-term value. If we are successful in delivering innovative and modernized healthcare to patients in a thoughtful and sustainable manner, then we create value for all other stakeholders too.

**We support our communities.**

We recognize Hims & Hers' activities take place within the context of a wider community, not just between us and the employee or the customer. As such, we strive to give back to our communities through our mission to modernize the healthcare system, while increasing access and providing health equality. We are committed to actively participating in and improving our communities and encourage our employees to do the same in their own communities.

Hims & Hers is committed to providing equal opportunity and non-discrimination in all areas of employment, including recruitment, hiring, assignments, transfers, promotions, demotions, compensation, working conditions and training.

Hims & Hers does not and shall not tolerate any form of discrimination on the basis of race/ethnicity, color, national origin, ancestry, sex/gender, gender identity/ expression, sexual orientation, marital/parental status, pregnancy/childbirth or related conditions, religion, creed, age, disability, genetic information, veteran status, or other protected status.

## preserving trust

### **We protect the privacy and security of personal data.**

Our customers trust us to maintain and protect the privacy and security of their personal data. In some instances, this information is protected under federal and state privacy and security laws and includes information about a person's physical or mental health condition, certain personal identifiers (e.g., name, telephone number, address), information about a person's health care payments, and other sensitive information. These laws require that certain personal data be handled in a confidential manner.

Hims & Hers is committed to respecting our customers' personal data. We comply with the data privacy and security laws of the countries in which we operate and are transparent about how we process the personal data of our customers. We must collect and use such data in accordance with our privacy policies and in compliance with applicable laws, regulations and standards where we do business.

It is important that we follow the following steps when handling personal data:

- Collect, use and disclose only the minimum amount of personal data need to perform your job duties;
- Do not discuss personal data with others who do not have a legitimate business purpose for such data;
- Ensure you log off and lock computers and devices when they are not in use;
- Always protect personal data, including when storing paperwork and computer files;
- Assess your surroundings before discussing personal data;
- Do not share or post your computer, device or application IDs or passwords;

- Do not post personal data on social networks; and
- Dispose of personal data in accordance with Company policies and procedures.

You must also promptly report any unauthorized disclosures of personal data or other violations of our privacy policies and procedures to Legal and Information Security at [security@forhims.com](mailto:security@forhims.com).

We must always remember that those we serve count on us to protect their personal information. In addition, protecting the confidentiality of those we serve is a condition of employment with Hims & Hers.

### **We ensure the quality and safety of our products and services.**

Our reputation and success are built on providing safe and quality products and services to our customers. We are committed to ensuring that the products and services we provide meet the high expectations of our customers and comply with applicable laws and regulations regarding good manufacturing practices ("GMP") and product safety where we do business.

We take quality into account when selecting our suppliers and partners and are committed to ensuring that our products are manufactured and distributed in a compliant manner. We require our suppliers and partners to comply with "GMP" requirements and quality standards, and we conduct audits and oversight of our global supply chain. When appropriate, we also work with our suppliers and partners directly regarding potential quality matters. If we are notified of product quality concerns, we take prompt action to fulfill our regulatory obligations regarding reporting along with any necessary corrective actions (such as initiating a product removal or recall).





It is the responsibility of our employees to promptly report all safety, quality or other concerns or complaints they become aware of regarding our products and services to our Quality team (e.g., a product has been mislabeled by a manufacturer, may have caused harm or injury to a patient, or been contaminated or adulterated). We may learn of such concerns or complaints in a variety of ways, such as through our websites, social media platforms, phone calls, meetings, conversations, and information received from Hims & Hers programs. Employees should direct questions to Legal and Quality at [quality@forhims.com](mailto:quality@forhims.com).

**We ensure we only offer access to high-quality medical care and services through our platform.**

Providing access to high-quality care for patients is of the utmost importance to Hims & Hers. As such, all healthcare providers (“HCPs”) providing services to patients through our platform must be committed to providing accurate, reliable and consistent services in accordance with applicable law, professional standards, and policies/procedures applicable to the platform.

All HCPs are required to maintain an appropriate, active professional license in each state in which they perform services for patients.

**We advertise and market our products and services in a truthful and honest way.**

We are committed to integrity in our advertising and marketing practices. The advertising and marketing of our products and services must be consistent with applicable laws and regulations where we do business. The claims we make about our products and services must be well supported by science and data, as well as truthful, accurate and not misleading. The labels and labeling of our products must include all information required by applicable laws and regulations, including appropriate warnings and directions for use. The prices we advertise about our products and services must be clear and not misleading. We also will not make false or misleading statements about our competitors or comparisons between their products and services and ours. Any statements regarding our competitors or their products and services must be supported by science and data. Employees should contact Legal with questions about which laws, regulations or other considerations apply.

## conducting business appropriately

### **We do not engage in bribery.**

Hims and Hers' stance against bribery is clear – we never make or accept bribes to advance our business. A bribe is something of value that is offered or given to improperly influence a decision. Bribes often consist of money, but they could also be disguised as gifts, trips, entertainment, charitable donations, favors, or jobs. We prohibit Hims & Hers employees and anyone acting on the Company's behalf (e.g., suppliers, agents, distributors, consultants, lawyers, etc.) from offering, giving, requesting, accepting or receiving anything of value for an improper or corrupt purpose, whether in dealings with a government official or the private sector, and regardless of the norms of local customs.

The US Foreign Corrupt Practices Act ("FCPA") regulates US companies doing business abroad. Under the FCPA, it is illegal for employees of US companies, wherever they are located, to directly or indirectly give anything of a value to a non-US government official, candidate for public office, political party or party official to gain an improper business advantage. It is also illegal under the FCPA to inaccurately record transactions in our books and records.

The UK Bribery Act impacts all UK registered companies and non-UK companies which carry on a business (or part of a business) in the UK, as well as UK citizens worldwide. UK Bribery Act has a very broad jurisdiction and allows for the prosecution of an individual or company with links to the UK, regardless of where the crime occurred. Like the FCPA, the UK Bribery Act prohibits bribery of a foreign public official; however, the UK Bribery Act is broader than the FCPA in terms of scope of covered conduct because it prohibits:

- private sector bribery (*i.e.*, commercial bribery);
- the acceptance of a bribe; and
- facilitation payments (*i.e.*, a payment to expedite a transaction or service).

Further, the UK Bribery Act includes no express allowance for bona fide promotional expenditures and contemplates the imposition of penalties on companies that fail to prevent bribery.

As a US company with a UK subsidiary, Hims & Hers employees and anyone acting on behalf of Hims & Hers must comply with the FCPA, the UK Bribery Act, as well as all local anti-bribery and anti-corruption laws and regulations where we do business. Employees should contact Legal with questions about which laws, regulations or other considerations apply.

### **We do not provide gifts, entertainment or other things of value.**

The exchange of business courtesies are normal and accepted business practices throughout the world and, when conducted appropriately, can enhance business relationships. However, providing gifts, hospitality expenses, entertainment or other things of value may present significant risk under applicable laws including the US Foreign Corrupt Practices Act, the UK Bribery Act, the Canadian Corruption of Foreign Public Officials Act, the US federal Anti-Kickback Statute, state-based anti-kickback laws, and other, similar anti-bribery and anti-corruption laws. Any such benefits must be provided in compliance with the Hims & Hers Anti-Corruption & Anti-Bribery Policy and related procedures, and with all applicable laws in every jurisdiction in which we do business.

No team member or any family member may solicit or accept from a supplier or customer gifts of money or any other gift, entertainment or other things of value that could influence or give the appearance of influencing Hims & Hers' business relationship with that supplier or customer. The acceptance of money, any gift, or any other thing of more than nominal value is strictly prohibited. Team members must notify a manager immediately if such gifts are delivered. Please refer to the Hims & Hers

Anti-Corruption & Anti-Bribery Policy for additional information. Employees should contact Legal with questions about which laws, regulations or other considerations apply.

### **We deal fairly with third parties.**

Hims & Hers depends on its reputation for quality, service and integrity. The way we deal with competitors and companies with which we do business molds our reputation, builds long term trust and ultimately determines our success. Each director, officer and employee of Hims & Hers should endeavor to deal fairly with our competitors and their employees and companies with which we do business and their employees. We must never take unfair advantage of others through manipulation, concealment, abuse of privileged information, misrepresentation of material facts or any other unfair dealing practice.

### **We comply with healthcare laws.**

We understand the higher standards that regulate healthcare. As a stakeholder in the healthcare industry, we are aware of and observe applicable healthcare “fraud and abuse” laws and strive to remain mindful and vigilant of the global healthcare requirements that govern our industry.

Although quite complex, healthcare “fraud and abuse” laws are intended to prevent financial considerations from interfering with clinical decision making, prevent patient harm, and prevent increased healthcare costs. While there are a number of healthcare fraud and abuse laws that govern the industry, we highlight two key areas of law here.

First, healthcare companies must be truthful in dealing with governmental agencies. US federal and state false claims acts and similar laws in other countries prohibit

submitting a false claim or making a false record or statement in order to gain reimbursement from, and/or avoid an obligation to, a government-sponsored program. It is incumbent upon Hims & Hers employees to remain mindful of these laws and ensure that, if the situation arises, any statements that we make to the government or claims that we make upon the government be complete, truthful and accurate.

Second, state and federal anti-kickback laws generally prohibit, absent certain exceptions, a healthcare company, employee or agent from offering anything of value (e.g., cash, entertainment, gifts, etc.) to any person with the intent to encourage that person to purchase, use, order, prescribe or recommend products or services that may be covered by insurance, including federal healthcare programs, such as Medicare or Medicaid. In some states, these prohibitions also extend to products and services that are paid for on a cash basis. This can include, in some instances, compensating an individual or entity for recommending our products and services, compensating healthcare providers for services in excess of fair market value.

Our suppliers are an extension of our Company. It is important that we engage suppliers in ways that uphold our commitment to integrity and excellence. Hims & Hers employees and contractors must follow the procurement process of Hims & Hers, and as they work with suppliers, ensure they honor commitments to safeguard Hims & Hers’ and its customers’ confidential information.

These laws are complex and require a fact-specific analysis. We should keep in mind that, even if our intentions are good, our actions may inadvertently violate Company policy or applicable laws and regulations. You should consult Legal and Compliance should you have questions about whether your actions are appropriate.



### **We comply with antitrust laws.**

We recognize that everyone benefits from a competitive marketplace. Antitrust and competition laws prohibit Hims & Hers from discussing pricing, suppliers or territories with competitors or making agreements with them on these or other competitive issues. Under certain circumstances, even informal discussions with competitors regarding business plans, marketing, pricing, cost or other similar matters may be illegal. We follow all applicable antitrust and competition laws, including federal and state laws, in all locations where we do business.

The key Federal Antitrust Laws are the Sherman Act, the Clayton Act, the Robinson-Patman Act, the Federal Trade Commission Act and the Hart-Scott-Rodino Act. These laws maintain the fundamental business conditions necessary for the proper functioning of a free enterprise system by requiring companies to act independently and sell products fairly and honestly on the basis of price, quality and service. Examples of prohibited anticompetitive conduct include:

- Stopping another company from entering the market
- Engaging in any type of bid rigging
- Agreements (formal or informal) with competitors regarding dividing customers, markets or territories

Violating antitrust laws can result in severe penalties, including criminal penalties and potential fines and damages. Employees should direct questions about antitrust laws to Legal.

### **We keep accurate financial books and records.**

We must keep accurate business records to maintain and safeguard shareholder confidence and properly manage Hims & Hers. This is also essential for us to meet our legal

and regulatory obligations to provide full, accurate and timely financial and other disclosures to governments where we do business. All of our financial books, records and accounts must fully and accurately reflect Hims & Hers' business transactions. This includes financial statements, time sheets, bills, expense reports, benefits reports, payroll records, performance reports and similar data. Our SEC reports, disclosures, and other public communications must also be full, fair, accurate, timely, and understandable.

Although financial reporting and controls are especially applicable to members of the Hims & Hers' Finance team, we are each responsible for complying with all financial controls and policies. Transactions should only be performed and approved by authorized individuals for legitimate business purchases and based on valid documentation. Employees must record all transactions promptly, accurately and completely. Employees who are involved in reporting financial and business information must comply with all applicable laws, including those regarding tax, financial statements, stock market listing requirements and corporate governance rules.

Employees are also responsible for reporting any unrecorded funds or assets or false entries in the financial books and records of the Company if they become aware of such activity. If an employee learns of or suspects accounting fraud, report it immediately by contacting [compliance@forhims.com](mailto:compliance@forhims.com) or the Company's Audit Committee.

### **We do not engage in insider trading.**

In our business functions, we encounter information, including non-public information, about Hims & Hers and our business partners. All such non-public information is considered confidential information. The use of material non-public information in connection with buying or





selling stocks and other securities, including “tipping” or passing information on to others, such as friends and family, who might make investment decisions on the basis of such information, violates this Code and is illegal under Federal law.

Information is considered material if it would likely affect the stock price or an investor’s decision to buy, hold or sell the stock. You must review and follow Hims & Hers’ Insider Trading Policy before making any trade of Hims & Hers stock, including stock option exercises and purchases or sales of Hims & Hers’ stock.

Examples of information that may be considered material include:

- Nondisclosed projections of anticipated earnings or losses;
- Future pending or proposed mergers, acquisitions or transactions;
- Major changes in management;
- Confidential information regarding our business partners;

- Proprietary technical specifications;
- Future, nondisclosed product launches; and
- Strategic business plan information.

If you have any questions or concerns as to whether information you possess may be considered material non-public information, contact Legal. (See the Insider Trading Policy for more information).

#### **We prevent money laundering.**

It is our policy to comply with all laws, regulations, and government guidance regarding bank secrecy, anti-money laundering (“AML”), and counter terrorist financing.

Money laundering is the illegal process of making money generated by a criminal activity, such as drug trafficking or terrorist funding, appear to have come from a legitimate source. The money from the criminal activity is considered “dirty,” and the process to conceal or disguise the true origin – *i.e.*, the “laundering” process—makes it look clean.

Employees should be cautious of warning signs of money laundering and terrorist financing, such as:

- Transaction patterns, including product purchases, that show a sudden change inconsistent with normal activities,
- Wire transfers to/from financial secrecy jurisdictions or high-risk geographic areas without an apparent business reason,
- Wire transfer activity that is unexplained, repetitive, unusually large, or that shows unusual patterns or is conducted with no apparent business purpose,
- Suppliers requesting to overpay or split payments between multiple bank accounts,
- Suppliers requesting that payments be made in a form outside of standard terms of business,
- Suppliers requesting to pay funds in a different country from which they perform operations,
- Suppliers requesting payment to a bank account that belongs to different third party,
- Customer payments made in advance of services performed when not part of standard terms of business,
- Customer payments made in cash outside of standard business operations,
- Customer payments from several different bank accounts,
- Customers who provide unusual or suspicious identification documents that cannot readily be verified,
- Customers who are reluctant to provide required information or who fail to proceed with transactions once information is required,

- Customers who appear to be acting as an agent for an undisclosed principal, and
- Payments that are requested or made to or from third parties without an apparent connection to the customer.

Employees involved in contracting with new suppliers, customers, distributors or other third parties must appropriately screen and assess such third parties before executing contracts and transactions. Employees must promptly notify Legal if they encounter any suspicious actual or potential money laundering activity.

#### **We comply with international trade laws.**

Hims & Hers is committed to complying with both the letter and spirit of all applicable international trade laws, regulations, and government policies in all of the jurisdictions in which we operate. In this context, international trade laws include all customs laws and regulations, export controls, trade and economic sanctions, and anti-boycott restrictions.

It is also our policy to establish and implement procedures and work instructions to help ensure compliance with applicable international trade laws. Employees are responsible for complying with all internal procedures and instructions related to compliance with international trade laws.

Violations of international trade laws can lead to significant penalties, including large fines and criminal penalties. You should direct questions and concerns about compliance with international trade laws to Legal.

## protecting our company

### **We protect our business assets.**

We care for and protect our business assets, which include our computers, equipment, resources, files, and work supplies. It is important that we secure all confidential information when working remotely or in open spaces and that we dispose of such information properly. We must take precautions to protect all business assets from theft, damage, and unauthorized access. We must also only use authorized devices, software, applications, and programs approved by Hims & Hers when conducting business for or on behalf of the Company. You should direct questions or concerns about our technology assets to IT at [helpdesk@forhims.com](mailto:helpdesk@forhims.com) or Information Security at [security@forhims.com](mailto:security@forhims.com).

### **We protect our confidential information and employee privacy.**

We are committed to protecting the confidential, proprietary, and private information of our employees, customers, partners, and others with whom we do business. We respect and safeguard the private information and intellectual property entrusted to us by our fellow employees, customers, and third parties, using it only for legitimate business purposes and in accordance with all applicable laws and governing contracts. We are all also responsible for protecting Hims & Hers' confidential information. The loss of confidential information can be extremely damaging to Hims & Hers. We do not disclose any confidential Hims & Hers information without a valid business purpose and proper authorization by Legal. Our obligations in this respect continue even if our employment or other relationship with Hims & Hers ends.

While we protect employee privacy, employees should not expect that personal information stored or transmitted through Hims & Hers information systems, such as email, instant messaging, computer programs or website browsers, or using our technology resources is private. Hims & Hers may access, monitor, or inspect our resources,

assets, and applications at any time without prior consent or knowledge of affected employees as permitted by law. This includes monitoring information stored on our computer equipment, electronic devices and other systems.

### **We protect our intellectual property.**

To protect our competitive advantage, we must safeguard our intellectual property. Our intellectual property includes all Company patents, copyrights, trademarks, trade secrets, and know-how – including designs, systems, technologies, programming code, and research – developed in the course of conducting our business operations.

We protect our intellectual property rights by ensuring we use appropriate marks and symbols on our logos, symbols and designs, e.g., <sup>TM</sup> or ®, when appropriate, and following our branding guidelines. In addition, it is your responsibility to ensure that all third parties and consultants working on behalf of Hims & Hers have signed non-disclosure or similar assignment of work product agreements to protect the Company's intellectual property. Employees and those working on behalf of the Company must respect, protect and defend the Company's intellectual property rights and use those rights in an appropriate and responsible manner.

We must also respect the intellectual property rights of third parties. Misappropriation or unauthorized use of another company or entity's confidential information or intellectual property could result in significant fines, penalties or legal actions for Hims & Hers. If you have questions or concerns regarding Hims & Hers intellectual property rights, contact Legal.

### **We avoid conflicts of interest.**

We are committed to making sound business decisions strictly on the basis of the Company's best interests without regard to our own personal interests. Conflicts of interest can have a significant negative impact on the



Company's reputation and the effectiveness of our business. A "conflict of interest" may occur when our personal activities, relationships, or interests improperly compromises our judgment or ability to act in the best interest of the Company. Examples of situations that may present a potential or an actual conflict of interest for employees:

- Other employment, board positions, advisory roles with a company engaging in (or seeking to engage in) business with or competing with Hims and Hers;
- Intimate relationships with co-workers or customers;
- Employees or an employee's family member has direct or indirect ownership in a company that is a Hims & Hers competitor, vendor or client;
- Any business, financial interest or relationship an employee or an employee's family member has that might appear to influence the employee's ability to meet their obligations to Hims & Hers;
- Receipt by employees, officers or directors, or a member of their family, of improper personal benefits as a result of such employee's, officer's or director's position at Hims & Hers; and
- Accepting certain gifts, entertainment or other business courtesies.

Loans by the Company to, or guarantees by the Company of obligations of, employees or their family members are of special concern and could constitute improper personal benefits to the recipients of such loans or guarantees, depending on the facts and circumstances. Loans by the Company to, or guarantees by the Company of obligations of, any director or officer or their family members are expressly prohibited.

It is our responsibility to avoid conflicts of interest, or even the appearance of a conflict of interest between personal interest and the interest of Hims & Hers. In certain situations, conflicts of interests might arise





despite our best intentions to avoid them. We must disclose any relationships, associations, or activities that may create actual, potential, or perceived conflicts of interest to your Manager and Legal as soon as you become aware of any potential for such conflict. Directors and officers must seek determinations and prior authorizations or approvals of potential conflicts of interest exclusively from the Audit Committee or other independent committee of the Board of Directors of Hims & Hers.

### **We protect corporate opportunities.**

All directors, officers and employees owe a duty to Hims & Hers to advance its legitimate interests when the opportunity to do so arises. As such, all directors, officers and employees may not take for themselves personally (or for the benefit of friends or family members) opportunities that are discovered through the use of Hims & Hers property, information or position or use Hims & Hers property, information or position for personal gain. Nor may they compete with Hims & Hers in any manner if doing so would breach their fiduciary obligations to the Hims & Hers.

### **We communicate appropriately.**

It's important for all of our Company communications to reflect who we are as a brand and our values as a Company. Our communications include everything from internal business communications involving fellow colleagues and vendors to external communications such as social media posts involving our products and services. Thoughtful and appropriate communication, both spoken and written, is vital to successful collaboration and to maintaining our culture. We have zero tolerance for communications that are false or misleading or that violate our Company positions, policies and procedures on Discrimination, Harassment and Safety.

We manage external communications with the media

and investment community – investors, brokers, analysts, and shareholders – very carefully. Employees must have special authorization and training to be permitted to communicate, either on or off the record, about Hims & Hers with the media and investment community. If you receive an inquiry from the media or investment community, you must direct it to our Corporate Communications team at [press@forhims.com](mailto:press@forhims.com).

These rules also apply to employees participating in engagements on behalf of the Company, such as speaking engagements and authoring publications, including op-eds. For such engagements, employees are required to obtain prior authorization from Corporate Communications and Legal.

It is our policy to cooperate with reasonable requests for information from government agencies and regulators. All employees are required to notify Legal before responding on behalf of the Company to a government notice, subpoena, search warrant, request for an interview or other non-routine request for access to information related to Company matters. Employees should always cooperate fully and be truthful in any information provided to the government. Employees may not alter, withhold or destroy records related to an investigation.

### **We use social media responsibly.**

Hims & Hers respects the right of employees to participate in social media/networking activities, subject to compliance with our Social Media Policy. However, Hims & Hers employees must also ensure that any statements issued by the Company are appropriate, truthful and responsible. We do not disclose confidential Company information or the confidential information of our customers, suppliers, business partners, or employees. Only those authorized employees may speak on behalf of the Company, including through Company social media channels.

## speaking up

We work together to promote an ethical workplace. That means speaking up about issues and concerns that could harm our Company's reputation or jeopardize the good work we are doing to modernize the health experience.

### Updating the Code.

The Code cannot cover every possible situation we might face at Hims & Hers. If specific situations are not directly covered by the Code, it is your responsibility to exercise good judgement and common sense, in compliance with applicable laws and regulations. In addition, business standards, laws and regulations differ between countries, states, and localities, and can change frequently. To account for such, we may modify the Code when necessary. Any modifications or waivers of the Code, however, must be approved by the Board of Directors.

It is your responsibility to read, understand, and incorporate the Code into all of your work at Hims & Hers. If you ever have a question or think that one of your fellow colleagues or the Company may be missing the mark on our commitments to the Code, speak up. We want and need to hear from you.

### Waivers of this Code.

We will waive application of the policies set forth in this Code only where circumstances warrant granting a waiver and in compliance with applicable law. This Code may be amended or modified at any time by the Board of Directors.

### Compliance Program Resources

The Compliance team—which is a function within our Legal Department—is responsible for oversight and implementation of Hims & Hers' Compliance Program.

The key components of Hims & Hers' Compliance Program include this Code, policies, training, communications, auditing, monitoring, and remediation of wrongdoing.

Employees have a responsibility to report irregularities related to compliance and integrity. Many people are available in the Company to help with advice or information about our compliance program or reporting concerns. For any questions about the Code or concerns about its implementation, please contact:

- Compliance at [compliance@forhims.com](mailto:compliance@forhims.com); or
- Human Resources at [hr@forhims.com](mailto:hr@forhims.com); or
- Legal at [legal@forhims.com](mailto:legal@forhims.com).

Alternatively, Hims & Hers maintains a Compliance Helpline where employees may have the option of reporting many concerns on an anonymous basis, consistent with our Compliance Reporting Policy. All reports made via the Hims & Hers Compliance Helpline will be submitted to the Hims & Hers Compliance department, in accordance with local law, for further review and investigation where appropriate and consistent with Hims & Hers privacy guidelines. You can submit a report via the Hims & Hers Compliance Helpline by phone at (844) 942-3312 (US) and 0800 051 7310 (UK) or online at [himsandhers.ethicspoint.com](https://himsandhers.ethicspoint.com).



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