

agilon health, inc.

Code of Conduct

April 16, 2021

## MESSAGE FROM THE CEO

As a team, we at agilon health have established and continue to enjoy a very positive reputation across our industry. This reputation rests on all our shoulders and is the direct result of the good work we all do every day. Your hard work and relentless pursuit of enabling our physicians to provide high quality and efficient health care to our members has brought us very positive recognition at a national level. Our reputation influences so many aspects of our company - the way our physician customers and partners value our services; whether or not health plans choose to contract with us and entrust their members to us; how regulators perceive us; and whether employees find agilon health a fulfilling place to work. A strong reputation will fuel growth and future success. We should not take it for granted. Therefore, it is important for all of us to protect our reputation through a strong culture of integrity and ethical conduct.

As part of our evolution as a high performing organization which brings people, solutions, capital, and technology together to enable primary care physicians to achieve long-term success, we have adopted this Code of Conduct that applies to all of us. All employees of agilon health are responsible for knowing the Code of Conduct and for abiding by high legal, ethical, and moral standards. Every employee of agilon health is required to be familiar with and comply with all federal and state laws, rules, and regulations that govern his/her role within the organization. If you are unfamiliar with these rules, it is your obligation to ask. Not knowing the rules or turning a blind eye to activities you are not comfortable with is not acceptable and violates our Code of Conduct.

We are all accountable for upholding these principles and behaviors in accordance with the highest of ethical and legal standards. Our Code of Conduct obligates us to avoid any conduct that even raises the appearance of impropriety and to hold ourselves to even higher ethical standards than the legal rules require. It is also important to know that breaches of the Code of Conduct will be taken seriously.

With your help, I am confident that our reputation will be upheld long into the future.

A handwritten signature in black ink, appearing to read "Steve Sell", enclosed in a thin black rectangular border.

Steve Sell  
Chief Executive Officer

**TABLE OF CONTENTS**

SCOPE AND OVERVIEW ..... 5

    Purpose..... 5

    Covered Persons..... 5

    Responsibilities of Supervisors and Managers ..... 5

    Raising Questions and Concerns ..... 5

    Anonymity and Confidentiality ..... 6

    Non-Retaliation and Non-Intimidation ..... 6

    Contact Information ..... 6

CODE OF CONDUCT ..... 7

    Mission and Values..... 7

    Obligation to Create and Maintain an Ethical Workplace. .... 7

        Be Honest and Truthful..... 8

        Comply with All Legal and Ethical Requirements ..... 8

        Cooperate with the Compliance Program ..... 8

        Standards Relating to Government Contracts..... 9

        Workplace Practices..... 9

        Political or Other Contributions..... 9

        Corporate Opportunities..... 9

        Conflict of Interest ..... 10

        Retention of Records..... 10

        Ineligible Persons and Exclusion Checks ..... 10

    Standards Relating to Business Practices. .... 12

        Business Practices..... 12

        Business Transactions..... 12

        Purchasing Policy..... 12

        Payments, Gifts, and Entertainment..... 12

            Giving Payments or Gifts..... 12

            Accepting Payments or Gifts ..... 13

    Standards Relating to Referrals ..... 13

        Compliance with Federal and State Anti-Referral Laws ..... 13

        Relationships with Healthcare Providers ..... 13

Marketing Activities .....	14
Standards Relating to Communications.....	14
Standards Relating to Confidentiality .....	15
Confidential Protected Health Information.....	15
Confidential Business Information .....	15
Responding to Improper Conduct.....	16
Investigations .....	16
Waivers .....	17
agilon health Compliance Program.....	17
COMPLIANCE CONTACT SHEET .....	19
ACKNOWLEDGMENT OF RECEIPT .....	20

## **SCOPE AND OVERVIEW**

### **Purpose**

In creating this Code of Conduct, agilon health, inc.'s ("agilon" or the "Company") goal is to ensure compliance with the laws, rules and regulations that govern its and its subsidiaries' operations. In order to live up to this commitment, agilon health has developed principles and rules to be followed by all employees, members of the Board of Directors and other individuals who work with agilon health to ensure that we are operating pursuant to the highest ethical and moral standards.

### **Covered Persons**

This Code of Conduct sets forth the standards of conduct and procedures that all directors, officers and members of the workforce of agilon health are expected to follow (each a "Covered Person" or "you"). All Covered Persons are expected to read and understand this Code of Conduct and to review it as necessary to be alert to situations that could be contrary to our established policies and procedures, including the Compliance Program, to comply with its provisions and report any suspected violations as described below. All Covered Persons must, sign and date an Acknowledgment of Receipt annually, and return that Acknowledgment to agilon health's Chief Compliance Officer.

### **Responsibilities of Supervisors and Managers**

Through our Compliance Program, we are striving to create open lines of communication to address all compliance issues that may exist, now and in the future. Supervisors and Managers must help create and maintain a work environment in which ethical, compliance and legal concerns may be raised and openly discussed with the appropriate personnel by anyone at any time. They are also responsible for ensuring: that the personnel they supervise understand the importance of this Code of Conduct, our policies and the Compliance Program; that the personnel they supervise are aware of the Compliance Program's standards and the procedures for reporting suspected unethical, illegal or improper activity; and that all Persons are protected from retaliation or intimidation if they come forward in good faith with information about suspected wrongdoing or unethical or illegal conduct.

### **Raising Questions and Concerns**

Neither this Code of Conduct nor our overall Compliance Program can cover every situation that you might face. As a result, if you are unsure of what the proper course of conduct might be in a specific situation, then you are urged to contact agilon health's Chief Compliance Officer, your immediate supervisor or manager or Human Resources, call agilon health's Compliance Hotline or communicate via the compliance web form located on the agilon health website.

You may contact any of the above referenced persons at any time, either in person, in writing, over the telephone or by e-mail with any compliance related concerns or questions you may have.

Any Covered Person who is aware of any illegal or unethical behavior or who believes that an applicable law, rule or regulation, or the Code of Conduct, has been violated, must promptly report

the matter to the Chief Compliance Officer. In addition, any Covered Person who has a concern about agilon health's accounting practices, internal controls or auditing matters, should report his or her concerns to the Chief Compliance Officer. **Any Covered Person wishing to make a report with respect to any of these matters anonymously, or to discuss a sensitive issue or question, may call the Compliance Hotline or Whistleblower Hotline, or communicate via the compliance web form on agilon health's website.** Covered Persons should take care to report violations to a person whom they believe is not involved in the matter giving rise to the violation. Covered Persons may also elect to report such facts directly to the Board of Directors of agilon health.

All reports of violations will be promptly investigated and, if appropriate, remedied, and if legally required, immediately reported to the proper governmental authority. This Policy is intended to comply with the requirements of Section 301 of the Sarbanes-Oxley Act of 2002, Section 922 of the Dodd-Frank Act of 2010 and the New York Stock Exchange's corporate governance standards for listed companies.

### **Anonymity and Confidentiality**

Your questions or concerns may be raised anonymously, as noted above. In addition, all reports will be held in the strictest confidence possible, consistent with the need to investigate the matter, and applicable law.

### **Non-Retaliation and Non-Intimidation**

No Covered Person who, in good faith, reports a compliance issue or raises compliance questions or concerns will be subjected to retaliation or intimidation. Any retaliation or intimidation for good faith reporting is, itself, a violation of our Compliance Program's standards of conduct. Any Supervisors or Managers or other Covered Person intimidating or retaliating against another for reporting a matter will be disciplined up to and including termination.

Covered Persons should know that it is a crime to retaliate against a person, including with respect to their employment, for providing truthful information to a law enforcement officer relating to the possible commission of any federal offense. Any Covered Person who believes that they have been retaliated against by agilon health, its Covered Persons, contractors, subcontractors or agents, for providing information to or assisting in an investigation conducted by a federal agency, Congress or a person with supervisory authority over the Covered Person (or other Covered Person who has the authority to investigate or terminate misconduct) in connection with conduct that the Covered Person reasonably believes constitutes a violation of federal criminal fraud statutes or any rule or regulation of the Securities and Exchange Commission, may file a complaint with the Secretary of Labor, or in federal court if the Secretary of Labor does not take action in a timely manner.

### **Contact Information**

The contact information for agilon health's Compliance Department, the Compliance Hotline and the Whistleblower Hotline, and the compliance web form is set forth in the Contact Sheet.

## **CODE OF CONDUCT**

agilon health has adopted the following Code of Conduct as a central part of our Compliance Program. The Code of Conduct sets forth the standards that all Covered Persons are expected to follow. Not only are all Covered Persons expected to adhere to this Code of Conduct, but they are also expected to adhere to its spirit, to maintain a high level of integrity in all dealings, and to avoid any conduct that could reasonably be expected to reflect adversely upon the integrity or reputation of agilon health.

Compliance with agilon health's Code of Conduct is a condition of employment and violation of these standards will result in discipline being imposed, up to and including termination. This Code of Conduct does not in any way constitute an employment agreement or assurance of continued employment. It is for the sole and exclusive use of the Company and may not be relied upon by any other party.

### **Mission and Values**

agilon health is committed not only to its mission of being the trusted, long-term partner of community-based physicians, enabling them to reimagine the patient experience for older adults and lead the transformation of care delivery in their communities, but to doing so pursuant to the highest ethical standards and to acting in compliance with all applicable federal and state laws, rules and regulations. This commitment extends to all of our interactions, including those with physician partners, payors, third party contractors or service providers or government entities that regulate us.

As a Covered Person, you are expected not only to act in compliance with all applicable legal standards, but to avoid any conduct that raises even the appearance of impropriety. While the legal rules are very important, we strive to hold ourselves to even higher ethical standards.

In short, we do not and will not tolerate any form of unlawful or unethical behavior by anyone associated with agilon health. We expect and require all Covered Persons to be law-abiding, honest, trustworthy and fair in all of their business dealings. To ensure that these expectations are met, the Compliance Program has become an integral part of our mission and of our business operations.

### **Obligation to Create and Maintain an Ethical Workplace.**

Because the highest standards of ethics and integrity are required of all Covered Persons, all Covered Persons must follow the guidelines below:

- Perform all services with the upmost professionalism and honest behavior, always focusing on adhering to applicable laws and regulatory requirements;
- Comply with all applicable federal and state laws and regulations, and agilon health's policies, including, but not limited to, those addressing fraud, waste and abuse; patient privacy, including the Health Insurance Portability and Accountability Act of 1996 ("HIPAA"), as amended, and regulations promulgated thereunder; and employees' health, safety and welfare in the workplace;

- Set an example through your behavior;
- Avoid situations that may result in conflicts of interest with agilon health and its business, i.e., situations where personal interests conflict or could be perceived as conflicting with agilon health’s business interests;
- Practice marketing in compliance with applicable federal and state requirements and forego any business that can only be obtained by improper or illegal means;
- Create a workplace that is free from harassment and discriminatory practices; and
- Be familiar with agilon health’s policies on document retention and confidentiality and abide by all applicable federal and state laws and regulations, and contractual requirements, regarding the retention of records.

### **Be Honest and Truthful.**

Be honest and truthful in what you say and do in all your dealings, both within and outside of agilon health. Strive always to do the right thing, both ethically and legally. Avoid any unethical, illegal or improper conduct, and do not take any action that you believe may be unethical, illegal or improper. Do not help anyone at agilon health or elsewhere engage in unethical or illegal conduct and do not “look the other way” if you suspect or become aware that anyone associated with agilon health is acting improperly.

### **Comply with All Legal and Ethical Requirements.**

Be familiar with and comply with all federal and state laws, rules and regulations that govern agilon health and your job within agilon health, including insider trading laws and agilon health policies.

Federal and state law prohibits the use of material, non-public information when trading in or recommending Company securities. In accordance with applicable federal and state law, all Covered Persons must abide by the agilon health Policy on Trading in Securities. As outlined in the Policy on Trading in Securities, no Covered Person may trade in Company securities on the basis of material, non-public information (“Insider Trading”). Further, no Covered Person who is in possession of material, non-public information may communicate such information to third parties (“Tipping”). These restrictions also apply to securities of other companies if a Covered Person learns of material, non-public information in the course of his or her duties for agilon health. In addition to violating Company policy, Insider Trading and Tipping are illegal.

### **Cooperate with the Compliance Program.**

Our Compliance Program will work effectively only if everyone works together to ensure its success, understands what is required under the law and our own Code of Conduct, and strives to ensure that the standards and policies we adopt are being followed at all times. You must fully cooperate with the Compliance Program by following its standards of conduct; reading all policies, memos or other documents relating to compliance that are distributed to you; asking questions if you do not understand the expectations for you under the Compliance Program; cooperating with



any compliance review, inquiry or investigation conducted by the Chief Compliance Officer or his or her designee; attending all required compliance meetings and training sessions; and reporting any possible or suspected compliance issues.

### **Standards Relating to Government Contracts.**

agilon health must conduct all relevant activities in a way that complies with all applicable federal and state healthcare laws, rules and regulations including, but not limited to, the False Claims Act and the Civil Monetary Penalties Law; federal and state anti-kickback laws, and related regulations; federal and state physician self-referral prohibition statutes, and related regulations; HIPAA, any amendments thereto, and state equivalents, federal and state laws that govern managed care organizations and downstream contracted entities; state laws that govern the activities of third-party administrators and utilization review agents; and state laws that prohibit general business entities from practicing medicine, controlling physicians' medical decisions or engaging in certain practices. Please refer to agilon health's other policies and procedures related to business and other interactions with the Government.

### **Workplace Practices.**

agilon health acknowledges our most valuable asset is our workforce and is committed to making every effort to provide each employee with a safe working environment. We treat one another with respect and collaborate to reach our goals. agilon health does not tolerate discrimination, harassment or retaliation. Behaviors that put our employees or business partners at risk are not allowed. Please contact the Compliance Hotline with any concerns.

Partnership and collaboration are part of our Company values and commitments that help to guide our everyday actions in executing our mission. agilon health acts as one team, collaborates deeply and embraces diversity in every aspect of our business. agilon health believes that respect for, and valuing, individual differences in race, ethnicity, national origin, gender, sexual orientation, gender identity, disability, religious affiliation, veteran status and other areas makes us stronger and more successful.

### **Political or Other Contributions.**

Covered Persons are free as private citizens to participate in the political process, express their political views or as an advocate for religious and charitable organizations. However, such participation should not interfere with the satisfactory performance of such Covered Persons' official duties, incorrectly imply agilon health's endorsement, or create a conflict of interest. Covered Persons must comply with all campaign finance and ethics laws.

agilon health's funds, services, facilities or assets may not be used on behalf of a political party or candidate in an election for federal office, and agilon health's ability to use its funds, services, facilities or assets in state or local elections is dependent upon the applicable state or local laws and regulations and agilon health policy. Please contact the Chief Compliance Officer with any questions or concerns regarding political or other contributions.

### **Corporate Opportunities.**

Covered Persons must make proper and efficient use of agilon health, supplier, customer and other third party assets, such as electronic communication systems, information (proprietary or otherwise), material, facilities and equipment, as well as intangible assets. Covered Persons may not take for themselves opportunities that are discovered through the use of workplace property, information or a position with agilon health. In addition, Covered Persons must act in a manner to protect such assets from loss, damage, misuse, theft, removal and waste. Covered Persons must ensure that such assets are used only for legitimate business purposes and may not use workplace property, information or a position with agilon health for any person benefit. However, in limited instances, Company assets may be used for other purposes approved by management. Finally, Covered Persons may not use workplace property, information or a position with agilon health to pursue a business opportunity for their own, or any related person's, benefit.

If you have any questions about proper use of assets and information, or any potential conflict, please report to the Compliance Department using one of the reporting methods on the Contact Page.

### **Conflict of Interest.**

A conflict of interest occurs when an Covered Person's personal interest interferes or appears to interfere with agilon health's interest. A conflict situation can arise when a Covered Person takes actions or has interests that may make it difficult to perform your work objectively and effectively. Conflicts of interest also arise when a Covered Person, or a member of his or her family, receives improper personal benefits as a result of your position in the Company. Covered Persons should not engage in any activity in the course of their relationship with agilon health that could, or could appear to, conflict with the best interests of agilon health, whether in the performance of their duties or when engaging in activities outside of agilon health. Covered Persons must avoid actual, potential or perceived conflicts of interest with agilon health in their professional relationships, including those that may arise in personal relationships as a result of your position with the company.

Additionally, a Covered Person who is a director or executive officer of agilon health is prohibited from receiving loans from the Company.

It is your responsibility to disclose to the Compliance Department any transaction or relationship that you feel could give rise to an actual, potential or perceived conflict of interest.

### **Retention of Records.**

agilon health is committed to maintaining thorough and accurate records in compliance with sound business practices and all applicable laws and regulations. Please consult agilon health's other relevant policies and procedures for additional information on the business and other records retention policies.

### **Ineligible Persons and Exclusion Checks.**

agilon health does not employ or contract with any persons who are deemed to be "Ineligible Persons" who have been excluded from participating in any federal or state healthcare programs, including Medicare and Medicaid. All Covered Persons, as well as all vendors, will be checked

against federal and state exclusion databases (i.e., OIG, GSA, and all relevant state Medicaid databases) to ensure that they have not been excluded from participating in federal or state healthcare programs.

## **Standards Relating to Business Practices.**

### **Business Practices.**

agilon health will forego any business transaction or opportunity that can only be obtained by unethical, illegal or improper means, and will not offer, pay, solicit or receive any unethical, illegal or improper payments.

### **Business Transactions.**

Business transactions will be based on the bona fide financial value of the transaction and its positive impact on agilon health's business. Covered Persons must endeavor to deal fairly with agilon health's physician partners and their patients, payor partners, vendors, suppliers, competitors, and each other. Such transactions will not be based on intent to induce or reward referrals or other business between agilon health and others with whom we do business.

In the course of agilon health's day-to-day operations, Covered Persons may deal with a variety of individuals, companies, organizations and government agencies. In those dealings, Covered Persons must never make any misrepresentations, dishonest statements or statements intended to mislead or to misinform. In addition, Covered Persons should not take advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material factors or any other unfair-dealing practice. If it appears that anything you have said has been misunderstood, you are to correct it promptly.

### **Purchasing Policy.**

All purchasing decisions must be made with the purpose of obtaining the highest quality service or item for agilon health at the most reasonable price and must be consistent with all applicable laws, including, without limitation, the federal and state anti-kickback laws. For example, purchasing decisions will not take into account the possible referral of business to, from, or for the benefit of, agilon health.

### **Payments, Gifts, and Entertainment.**

Covered Persons may not engage, either directly or indirectly, in any corrupt business practice, including bribery, kickbacks or payoffs, intended to influence or reward favorable decisions of any physician partner or their patients, providers, payors or other referral source, government representative, contractor, vendor, or any other person in a position to benefit agilon health or the Covered Person in any way.

### **Giving Payments or Gifts.**

Gifts or other items may be offered to another person only if they are within the limits as outlined in agilon health's Accepting Payment or Gifts Policy and only if it is clear from the circumstances that they are given only as tokens of friendship or business hospitality. They cannot be given with an intent to induce referrals or under circumstances that make it appear that they are given with such intent.

Gifts of cash or cash equivalents (e.g., gift certificates) to payors, referral sources, physician partners or their patients or potential patients that are not part of an approved incentive program are strictly prohibited. Meals of modest value may be offered only in connection with informational or educational presentations.

Gifts of even nominal value may not be offered to any governmental official. Such gifts can be misinterpreted as an attempt to improperly influence the official and are absolutely prohibited.

### **Accepting Payments or Gifts.**

Covered Persons may not accept any gifts, gratuities or other favors under circumstances from which it could be inferred that the Covered Person's action was for his or her own benefit, and not solely for the benefit of agilon health. Gifts of cash or cash equivalents are strictly prohibited. This policy does not prohibit the receipt of gifts of nominal value that are clearly tokens of friendship or business hospitality.

Free lunches or other meals from suppliers or other vendors may not be accepted unless such meals are of modest value and accompanied by an informational or educational presentation.

### **Standards Relating to Referrals**

#### **Compliance with Federal and State Anti-Referral Laws.**

The federal and state anti-kickback statutes make it a crime to give or receive any remuneration (which is broadly defined to include money, goods, and services) in exchange for a referral or as an inducement to provide healthcare services paid for by any federal or state healthcare program, including Medicare and Medicaid managed care plans.

A kickback is an improper payment, gift, service or item of value offered or received in return for increased business, including, but not limited to, patient referrals. Under federal and state anti-kickback statutes, kickbacks are prohibited, and directly or indirectly giving or offering anything of value in exchange for patient referrals is a violation of the law.

In accordance with these rules, agilon health does not pay or offer any remuneration to other physicians, providers, payors, vendors, or anyone else, either directly or indirectly, for referrals or other business; nor do we solicit or accept any remuneration to refer our physicians partners' patients or business to other providers, suppliers or anyone else. This includes giving any form of remuneration, including virtually anything of value, in return for a referral. Accordingly, you cannot accept, solicit or provide kickbacks in return for referrals, and you must ensure that any business dealings with referral sources are at fair market value and negotiated at arm's length.

#### **Relationships with Healthcare Providers.**

The federal "physician 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. All contracts, leases and other financial relationships with physician partners, providers,

suppliers and others with whom we have a referral relationship or do business will comply with the applicable anti-referral laws, including the federal and state Stark and anti-kickback laws. We will not, for instance, provide free services or items or other benefits to any party with whom we have a relationship; nor will enter into commercially questionable business relationships in order to further a referral relationship.

### **Marketing Activities.**

agilon health shall comply with all applicable marketing regulations and guidelines, including, but not limited to, appropriate disclaimers on marketing materials, reporting suspected marketing guideline violations, providing assistance to beneficiaries to select a plan that is in their best interest, and limiting sales and marketing activities and distributions to common areas of healthcare settings. agilon health shall not engage in activities prohibited under applicable law, including, but not limited to, offering sales or appointment forms to beneficiaries, accepting enrollment applications, mailing marketing materials on behalf of a plan sponsor, offering inducements to persuade beneficiaries to enroll in a particular plan or accepting compensation in any form from a plan sponsor in exchange for soliciting beneficiaries.

All marketing activities and advertising by agilon health and its Covered Persons must be based on the merits of the services we provide and must not involve any promise, express or implied, of remuneration for referrals or other business.

Marketing activities and advertising must be truthful and not misleading, and must be supported by evidence to substantiate all claims made. In this regard, agilon health's best advertisements are the quality of the services we provide. No Covered Persons should disparage the service or business of a competitor through the use of false or misleading representations.

### **Standards Relating to Communications**

agilon health has designated certain individuals the responsibility to communicate with third parties such as securities market professionals, the media and shareholders on behalf of the Company. Unless you have been designated to communicate on behalf of the Company, you should refer all inquiries to our Investor Relations Department, or the appropriate officer designated in our Regulation FD Policy or Board Communications Policy.

agilon health understands that Covered Persons may use social media accounts or platforms, but before posting any information, Covered Persons must confirm that any post complies with this Code of Conduct and agilon's other policies. Covered Persons are not permitted to disclose any confidential information or discuss any agilon health business without authorization from the Investor Relations Department.

## **Standards Relating to Confidentiality**

### **Confidential Protected Health Information.**

agilon health and all of its Covered Persons are bound by and must observe all confidentiality provisions of HIPAA, as amended by the Health Information Technology for Economic and Clinical Health Act of 2009 (the “HITECH Act”), and other applicable federal and state laws, rules and regulations governing the confidentiality of medical records and information. The laws concerning the privacy and security of health information are very broad and cover many of our business activities. All Covered Persons will keep protected health information and personally identifiable information in the strictest of confidence in accordance with these requirements. Such information will not be disclosed to anyone unless done in a manner that is permitted by applicable law.

In this regard, any disclosure of personal health information or personally identifiable information will be made in compliance with the HIPAA regulations or other applicable laws, rules and regulations, on a need to know basis, and will consist of the minimum amount of information required to perform the function. Any suspected or actual breach of such information must immediately be reported to the Chief Compliance Officer. Please refer to our HIPAA Policy for additional information.

### **Confidential Business Information.**

Confidential information acquired by Covered Persons in the course of their relationship with agilon health, including from third parties with whom agilon health does business, must also be held in confidence and may not be used as a basis for personal gain by Covered Persons, their families, or any third-party. Such information includes, but is not limited to: patient lists/information of agilon health’s physician partners, development plans, marketing strategy, financial data, proprietary research, and information about pending or contemplated business deals.

Covered Persons should take steps to safeguard confidential information by keeping such information secure, limiting access to such information to those who have a need to know in order to do their job with agilon health, and avoiding discussion of confidential information in public areas, for example, in elevators, hallways, lobbies, restrooms and public transportation facilities. Confidential information may be disclosed to others when disclosure is authorized by the Company or legally mandated. The obligation to preserve confidential information is ongoing, even after termination of employment.

## **Responding to Improper Conduct**

This Code of Conduct will be enforced on a uniform basis for everyone, without regard to a Covered Person's position within the Company. If you violate the Company's Code of Conduct, you will be subject to disciplinary action. Supervisors and Managers of a disciplined Covered Person may also be subject to disciplinary action for their failure to properly oversee the Covered Person's conduct, or for retaliation against a Covered Person who reports a violation.

The Company's response to misconduct will depend upon a number of factors including whether the improper behavior involved illegal conduct. Disciplinary action may include, but is not limited to, reprimands and warnings, probation, suspension, demotion, reassignment, reduction in salary or immediate termination. Covered Persons should be aware that certain actions and omissions prohibited by the Code of Conduct might be crimes that could lead to individual criminal prosecution and, upon conviction, to fines and imprisonment.

## **Investigations.**

The Company shall require the service provider(s) or others operating the Compliance Hotline, the compliance email account, the compliance web form and the Whistleblower Hotline to provide:

- i. to the Chief Compliance Officer immediate notifications of any complaints received, and the Chief Compliance Officer shall promptly forward to the Chairman of the Audit Committee any complaints received that are within the scope of this Code of Conduct; and
- ii. to the Chairman of the Audit Committee and the Chief Compliance Officer, monthly and quarterly reports of all complaints received.

Upon receiving a complaint pursuant to this Code of Conduct that the Chief Compliance Officer determines relates to concerns about the Company's financial statements, accounting, internal controls or auditing matters, the Chief Compliance Officer will notify the Chairman of the Audit Committee that a complaint has been received. No person who is the subject of a complaint will receive such a notification.

The Chief Compliance Officer, in conjunction with internal audit personnel, to the extent the Chief Compliance Officer deems necessary or appropriate, will undertake a preliminary investigation on behalf of the Audit Committee to determine if the information can be substantiated. Upon receiving the results of the preliminary investigation, the Chairman of the Audit Committee will determine if any further action is required to follow up on the complaint, in accordance with the Audit Committee Charter.

Upon receiving any complaints relating to other matters covered by this Code of Conduct, the Chief Compliance Officer will notify the Chairman of the Compliance and Quality Committee that a complaint has been received, and will conduct a preliminary investigation. Upon receiving the results of the preliminary investigation, the Chairman of the Compliance and Quality Committee will determine if any further action is required to follow up on the complaint, in accordance with the Compliance and Quality Committee Charter.



The Chief Compliance Officer will maintain a log of all complaints received under this Policy, tracking their receipt, investigation and resolution. A periodic summary report will be provided by the Chief Compliance Officer to the Audit Committee or Compliance and Quality Committee, as applicable, for all complaints received under this Policy.

All information disclosed during the course of any investigation will remain confidential, except as necessary to conduct, conclude, and, if appropriate, prosecute the investigation or as otherwise required by applicable law. In the case of any anonymous complaint, a person who reports a suspected violation may not be informed of the results of an investigation.

All employees and members of management have a duty to promptly cooperate and provide accurate information in connection with any investigation of reports of questionable conduct, or of discrimination, retaliation or harassment resulting from the reporting or investigation of such matters.

### **Waivers.**

Covered Persons should understand that waivers or exceptions to the Code of Conduct will be granted only in advance and only under exceptional circumstances. A waiver of the Code of Conduct for any executive officer or director may be made only by the Board of Directors of agilon health or a committee of the Board of Directors and must be promptly disclosed to shareholders in accordance with applicable law and exchange requirements.

### **agilon health Compliance Program**

agilon health's Compliance Program is responsible for the organization's awareness of applicable federal and state laws and regulations. Our Compliance Program, along with our policies and procedures, provide guidance in maintaining appropriate business practices. The Chief Compliance Officer is responsible for overseeing and managing all aspects of the Compliance Program. agilon health's Compliance and Quality Committee has been established to assist the Chief Compliance Officer in providing guidance in the execution of the initiatives to meet the Compliance Program goals.

The primary components of the agilon health Compliance Program include, but are not limited to, the following:

- Written Policies and Procedures
- Designation of a Chief Compliance Officer and a Compliance Committee
- Conducting Effective Training and Education
- Developing Effective Lines of Communication
- Enforcement Through Publicized Disciplinary Guidelines and Policies Dealing with Ineligible Persons
- Auditing and Monitoring

- Responding to Detected Offenses, Developing Corrective Action Initiatives, and Reporting to Government Authorities
- Whistleblower Protection and Non-Retaliation for Reports of Non-Compliance

## **COMPLIANCE CONTACT SHEET**

### **Compliance Department**

Lisa Ali, Chief Compliance Officer:

[Lisa.Ali@agilonhealth.com](mailto:Lisa.Ali@agilonhealth.com)

(657) 207-4400

E-mail: [complianceAH1@agilonhealth.com](mailto:complianceAH1@agilonhealth.com)

<https://reportcompliance.agilonhealth.com/default.aspx>

### **Compliance Hotline**

Number: (833) 668-8638

### **Whistleblower Hotline**

Number: 800-916-7037; Company identifier: 244566

Weblink: [https://irdirect.net/agilon/whistleblower\\_iframe/](https://irdirect.net/agilon/whistleblower_iframe/)

**ACKNOWLEDGMENT OF RECEIPT**

I acknowledge that I have received a copy of the Code of Conduct for agilon health, inc. and its subsidiaries (“agilon”). I agree to read the Code of Conduct, conduct myself in conformity with all its standards and requirements, and fully cooperate with agilon health in carrying out the objectives of its Compliance Program.

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Print Name

\_\_\_\_\_  
Job Title or Description

\_\_\_\_\_  
Today’s Date

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info@agilonhealth.com  
agilonhealth.com