



Code of Business Conduct and Ethics

I. Purpose and Scope

The Board of Directors (the “***Board of Directors***”) of Cano Health, Inc. (together with its subsidiaries, the “***Company***” or “***we***” or “***us***” or similar words) has established this Code of Business Conduct and Ethics (the “***Code***”) to aid the Company’s directors, officers, employees, consultants and other third parties providing services to the Company in making decisions that are legal, ethical and compliant with all applicable laws, rules and regulations when conducting the Company’s business and performing their day-to-day duties. This Code is applicable to all directors, officers, employees, consultants and other third parties providing services to the Company, which are referred to herein from time-to-time as “***you***,” “***your***” or similar words.

We are committed to promoting the highest standards of ethical business conduct and compliance in pursuit of our mission *to improve patient health by delivering superior primary care medical service, while forging a life-long bond with our members.*

At Cano Health, we follow several guiding principles. We are:

- ***Patient-Centered:*** We show empathy and treat patients like family. And we all take responsibility for delivering world-class services.
- ***Service-Focused:*** We show initiative at every opportunity and form enduring relationships with our patients and our colleagues.
- ***Results-Oriented:*** We value performance and collaborate to succeed as a team.
- ***Trustworthy & Transparent:*** We always do the right thing – ethically, legally, and professionally.
- ***Continuously Improving:*** We are persistent in our pursuit of excellence.

Through this Code, we support our guiding principles by continuously ensuring:

- Honest and ethical conduct, including the ethical handling of actual or apparent conflicts of interest between personal and professional relationships;
- Full, fair, accurate, timely and understandable disclosure in reports and documents that we file with, or submit to, the U.S. Securities and Exchange Commission (the “***SEC***”) and in our other public communications;
- Compliance with all applicable governmental laws, rules, regulations, orders, interpretations, guidelines, listing standards and the like issued by any government or any of its agencies, departments, commissions, bureaus, court and other similar entity with regulatory authority over us and the conduct of our business, including, without limitation, self-regulatory

organizations, such as the New York Stock Exchange (collectively, “Laws”);

- The prompt internal reporting of suspected or actual violations of this Code, Company policies or Laws to either the Company’s anonymous reporting HOTLINE (the “HOTLINE”) or to the Company’s Chief Compliance Officer (the “CCO”), as outlined in Section IV, “Compliance Procedures – Reporting” at the end of this Code; and
- Accountability for adherence to this Code.

The Company’s Board of Directors oversees the Company’s implementation of this Code and the Board of Directors has delegated day-to-day responsibility for administering and interpreting the Code to the Company’s Chief Compliance Officer. Our General Counsel has been appointed the Company’s Chief Compliance Officer under this Code.

We expect you to exercise reasonable judgment at all times when conducting our business. We encourage you to refer to this Code frequently to ensure that you are acting within both the letter and the spirit of this Code. We also understand that this Code will not contain the answer to every situation you may encounter in performing your job.

Accordingly, if you have questions or concerns about this Code, we encourage you to speak with your supervisor (if applicable or appropriate) or the Chief Compliance Officer. However, when reporting suspected or actual violations of this Code, you must report those situations to either the CCO or through the HOTLINE.

As you may have other legal and contractual obligations to the Company, this Code is not intended to reduce or limit the other obligations that you may have to the Company, whether through a contract, agreement, pursuant to applicable Laws or otherwise. Instead, the standards in this Code should be viewed as the *minimum standards* that the Company expects from you in conducting our business.

II. Standards of Conduct

a) Compliance with Laws

We require you to comply with all Laws applicable to us wherever we conduct our business and to comply with all of our policies & procedures. You are expected to use good judgment and common sense in seeking to comply with these Laws and our policies & procedures and to ask for advice whenever you are uncertain about them.

If you become aware of a violation of any Law or any of our policies (including this Code) by any of our directors, officers, employees, consultants or any other third party providing services to, or doing business with, the Company, or on behalf of the Company, you must promptly report the matter to either the HOTLINE or to the CCO, as outlined in Section IV, “Compliance Procedures – Reporting” at the end of this Code.

It is imperative that you promptly report any violation to these resources to enable our taking swift action to address the matter. However, nothing in this Code is intended to discourage you from reporting any illegal activity, including any violation of the healthcare fraud and abuse Laws, HIPAA Laws, securities Laws, antitrust Laws, environmental Laws or any other federal, state or foreign Law to the appropriate regulatory authority. As described under “Compliance Procedures,” you will not suffer any retaliation for good faith reporting of violations and other

related matters.

b) Conflicts of Interest

We are committed to promoting the avoidance of actual, potential and/or perceived Conflicts of Interest. You have a primary business and ethical responsibility to the Company to avoid any interest, investment, transaction, activity or relationship that may interfere or conflict with, or have the potential to, or the appearance of, interfering or conflicting with, the performance of your duties to the Company in a loyal and effective manner to the best of your ability and in the Company's best interest, which are "**Conflicts of Interest**." Further details about Conflicts of Interest are set forth in our Conflicts of Interest Policy.

In general, "Conflicts of Interest" include any interest, investment, transaction, activity or relationship that is, or appears to be, or potentially could be, incompatible with the Company's best interests or that could impact, or appear to or potentially impact, your objectivity or your ability to act in the Company's best interest.

Our rules on avoiding Conflicts of Interest cover not only you, but also your "Family Members" and your "Related Persons," each defined as follows:

- "**Family Members**" means your spouse/domestic partner/significant other, children/stepchildren, mother/father, stepparents, sisters/brothers, mother-in-law/father-in-law, daughters-in-law/sons-in-law, sisters-in-law/brothers-in-law, stepfamily member or any other person (other than a tenant or employee) sharing your household; and
- "**Related Persons**" means someone with whom you have a close personal relationship, such as significant other or longtime friend.

A Conflict of Interest situation can arise when you have interests that may make it difficult for you to perform objectively and effectively your duties for the Company. Conflicts of Interest also arise when you, your Family Members and/or your Related Persons receives inappropriate personal benefits as a result of your position in the Company. As individuals tend to identify their interests with those of their Family Members and Related Persons, your Family Members and your Related Persons generally should refrain from activities in which it would be improper for you to engage in.

While not exhaustive, the following are several examples of situations that can result in a Conflict of Interest:

- having certain financial interests in any of the Company's vendors, contractors, suppliers and/or competitors. The Company discourages you and your Family Members and Related Persons from investing in firms that compete with us or with which we or our business partners have business relations. Because of the risk of creating divided loyalty, or its appearance to other parties covered by this Code and to other firms with which we deal, you and your Family Members and Related Persons may not have a substantial investment in a present or potential competitor, customer or supplier of the Company or any other firm with which we or our suppliers, customers or competitors deals or reasonably might deal. This would exclude an investment otherwise determined by the CCO not to constitute a Conflict of Interest in accordance with the guidelines set forth in the Company's Conflicts of Interest Policy. Normally, a substantial investment would not include, nor would a Conflict of Interest include, an equity interest which is 5% or less of the capital stock or other equity of a publicly-traded

company or as a result of investments made through a 401(k)-money manager, mutual fund or similar commingled investment fund;

- having an interest in a transaction in which the Company is, or may be, interested;
- taking advantage of the Company's business opportunities for improper personal profit or other benefit;
- receiving fees, commissions, material gifts or other compensation from any of the Company's vendors, contractors, suppliers and/or competitors;
- having certain outside activities: you may not serve as a consultant to, or as a director, officer, employee, partner, agent or representative of, an organization that is or potentially is a competitor, customer, supplier or other business account of the Company or a supplier or customer of any such firm, except to the extent determined by the Company's CCO not to constitute a Conflict of Interest. Even if you receive no pay from such an organization and/or have no direct or indirect contact with such organization in the performance of your work for the Company, such a relationship can create the appearance of divided loyalty and the risk that you may inadvertently disclose proprietary information to such organization or allow such organization to benefit through your identification with the Company. A Conflict of Interest may also exist if your outside activities are so demanding on your time or attention that they interfere with your job performance or performance of services. In addition, you cannot use Company property in connection with your outside employment or business activities, except in very limited (de minimis) ways, nor can you use your position at the Company to benefit your outside employment or business activity in any other way. Finally, if you might receive public attention for work that you do in connection with outside employment or outside volunteer activity, you must immediately report such situation to the CCO; and/or
- having certain workplace relationships: Personal relationships in the workplace can give rise to actual or potential Conflicts of Interest. If you are a manager or are involved with making employment decisions, you must disclose to the CCO any actual or potential Conflicts of Interest that you may have with respect to any individual that you are managing or about whom employment decisions are being made. Note: while romantic relationships sometimes develop at work, they too can give rise to actual or potential Conflicts of Interest and they must also be disclosed to the Company's CCO. At no time may any manager supervise an employee, consultant or service provider with whom they have a romantic relationship or comparable partnership. It is considered a potential Conflict of Interest for you and your Family Members to work within the same business department, group or area, e.g., health center, wellness center, or a business unit. Therefore, you and your Family Members should not apply for positions with the Company that are in the same business department, group or area as another Family Member. During the new job application process, the Company will ask new job applicants to disclose whether they have any Family Members who are at such time employed by the Company.

You must not enter into, nor permit there to continue, any Conflict of Interest, unless such situation is reported in writing to the Company's CCO prior to engaging in the applicable interest, investment, transaction, activity or relationship and it is approved in writing by the CCO. You are also responsible for ensuring that your Family Members and Related Persons do not engage in Conflicts of Interest without obtaining the CCO's written approval prior to engaging in the applicable interest, investment, transaction, activity or relationship.

You also have the duty to disclose to the CCO any Conflict of Interest that you become aware of that is being pursued by other directors, officers, employees, consultants and third parties covered by this Code and/or their Family Members or Related Persons.

You are obligated to periodically review your own personal and investment situations, as well as those of your Family Members and Related Persons and disclose to the CCO any actual, apparent or potential Conflicts of Interest that arise (including any possible Conflicts of Interest that could reasonably be expected to arise) by virtue of your own activities or the activities of your Family Members or Related Persons.

You are also obligated to respond fully to all Company Conflict of Interest surveys and questionnaires and completing all training offered by the Company in a timely manner.

It is recognized that, in certain cases, enterprises in which you have an interest may be actual or potential customers or suppliers of goods or services to the Company. In such cases, those interests, investments, transactions, activities or relationships may not pose a Conflict of Interest if the terms of the applicable transaction are at least as favorable to the Company as terms that would be generally available at the time for a comparable transaction in arm's length dealings with an unrelated third party under the same or similar circumstances.

Following reporting by you of any such situation, the CCO is responsible for overseeing the determination of whether the terms of any such interest, investment, transaction, activity or relationship meet the foregoing standards. The CCO's determination that any interest, investment, transaction, activity or relationship does not constitute a Conflict of Interest shall not be considered a waiver of the Company's Conflicts of Interest Policy or this Code.

Special Note regarding Directors' Conflicts of Interest: Participation on the Company's Board of Directors carries with it particular responsibilities to the Company's stockholders. As such, in addition to the affirmative duty to report any actual or potential Conflict of Interest, the CCO will survey each director annually to determine if the director has any actual or potential Conflicts of Interest.

In addition to the annual survey, any director with an actual or potential Conflict of Interest occurring at any time during the year must, as soon as practicable, notify the CCO of the material facts of all actual or potential Conflicts of Interest. The CCO shall notify the Chair of the Audit Committee of any actual or potential Conflicts of Interest involving a director. The Chair of the Audit Committee, with such assistance from the CCO and any outside advisers the Chair deems necessary or appropriate, shall gather the material facts of the actual or potential Conflict of Interest and shall review such material facts with the CCO and the other members of the Audit Committee at one or more committee meetings.

The director with the actual or potential Conflict of Interest must not participate in the Audit Committee's consideration of the Conflict of Interest. In the event the Chair of the Audit Committee has the actual or potential Conflict of Interest, the remaining members of the Audit Committee shall designate an alternate member of the Audit Committee to lead the Audit Committee's consideration of the Conflict of Interest and report to the Board of Directors.

The Chair will periodically report such matters to the full Board, which may assume oversight of the matter in question.

In their meetings, the Audit Committee will determine whether an actual or potential Conflict of Interest exists. If the Audit Committee determines that no actual or potential Conflict of Interest exists, the Audit Committee shall not take any further action except to record its determination in minutes of the meeting as provided below.

If the Audit Committee determines that an actual or potential conflict of interest exists, the Audit Committee shall determine an appropriate remedy, which may include, without limitation, one or more of the following actions—

- not providing the director any information regarding the subject matter of the actual or potential Conflict of Interest;
- asking the director to recuse from any review or vote in a meeting of the Board of Directors or committee on the subject matter of the actual or potential Conflict of Interest;
- requiring the Director to participate in supplemental training on Conflicts of Interest;
- requiring the director to unwind the transaction or activity causing the Conflict of Interest; and/or
- asking the director to resign from the Board of Directors.

If the actual or potential Conflict of Interest involves a contract or other transaction between the Company and a director or between the Company and any corporation, firm or association in which the director has a material financial interest, the contract or transaction also may be approved by the Company's stockholders or full Board of Directors. The Audit Committee also shall consider whether disclosure of the actual or potential Conflict of Interest is necessary or appropriate under applicable Laws.

c) **Insider Trading**

Employees, officers, directors, consultants and other third parties providing services to the Company who have material, non-public information about the Company or other companies, including our suppliers and customers, as a result of their relationship with the Company are prohibited by law and Company policy from trading in securities of the Company or such other companies, as well as from communicating such information to others who might trade on the basis of that information.

Examples of types of information that could be considered material are financial results, financial forecasts, dividends, possible mergers, acquisitions, joint ventures and other purchases and sales of or investments in all or part of a company, obtaining or losing important contracts, important product developments, major litigation developments and major changes in business strategy.

Company policy prohibits the misuse of confidential information gained in the course of employment with or service to the Company, including: (i) trading securities on the basis of any such confidential information; or (ii) disclosing such information to another person who uses it for the purpose of trading securities. Information is considered to be confidential if it has not been adequately disclosed to the public.

Examples of adequate disclosure include public filings with securities authorities such as the SEC, issuance of press releases, and meetings with members of the press and the public. If you are aware of confidential information relating to the Company or relating to firms with which we do business or are negotiating or competing, you may not buy or sell securities of the Company or such other firm or disclose this information to any person who uses it for the purpose of trading securities.

To help ensure that you do not engage in prohibited insider trading and avoid even the appearance of an improper transaction, the Company has adopted an Insider Trading Policy, which is distributed to employees and is also available from the CCO.

Also, to guard against even the appearance of improper trading, regardless of whether you have knowledge of non-public information concerning the Company, the Company has instituted the following policies regarding trading in securities:

- **Trading Restricted Periods & Open Trading Windows:** Certain designated insiders must not trade Company securities during any “restricted period,” which unless otherwise instructed by the CCO which continues from the last day of the month of each of the Company’s fiscal quarters until 2 business days after the public release of the Company’s earnings for that quarter. For example, as the 3rd quarter ends on September 30th, the restricted period would last from September 30th through the end of the 2nd trading day after the Company issues its earnings release for the 3rd quarter, which provides the market with 2 business days for the Company’s earnings results to be adequately disseminated to the public. Please keep in mind that these restricted periods may change from time to time, as notified by the CCO; and
- **Pre-Clearance with CCO:** Certain designated insiders must pre-clear all transactions in Company securities with the CCO, regardless of timing, even during open window trading periods.

Additionally, there may be other periods when, because of special circumstances (for example, a transaction), trading in the Company’s securities may be restricted; the CCO will circulate notices of these periods.

If you are uncertain about the constraints on your purchase or sale of any Company securities or the securities of any other company that you are familiar with by virtue of your relationship with the Company, you should consult with the CCO before making any such purchase or sale.

The Insider Trading Policy also applies to your “Family Members,” which include your spouse/domestic partner/significant other; children/stepchildren; mother/father/stepparents; sisters/brothers; mother-in-law/father-in-law; daughters-in-law/sons-in-law; sisters-in-law/brothers-in-law; stepfamily members; and any other person (other than a tenant or employee) sharing your household.

d) Confidentiality

You must maintain the confidentiality of confidential information entrusted to you by the Company or other companies that deal with us, including our suppliers and customers, except when disclosure is authorized by a supervisor or is legally mandated. Unauthorized disclosure of any confidential information is prohibited.

Additionally, you must take appropriate precautions to ensure that confidential or sensitive business information, whether it is proprietary to the Company or another company that deals with

us, is not communicated within the Company, except to those who have a need to know such information to perform their responsibilities for the Company.

You also must abide by any lawful obligations that you may have to your former employer. These obligations may include restrictions on the use and disclosure of confidential information, restrictions on the solicitation of former colleagues to work at the Company and non-competition obligations.

e) External Communications; Responding to the Press and Government Requests for Information; Social Media

Third parties may ask you for information concerning the Company. Unless otherwise required by Law, other than the Company's designated spokespersons, you must not discuss internal Company matters with, or disseminate internal Company information to, anyone outside the Company, except as required in the performance of their Company duties and, if appropriate, after confirming with the Law Department that a confidentiality agreement is in place.

This prohibition applies particularly to inquiries concerning the Company from the media, market professionals (such as securities analysts, institutional investors, investment advisers, brokers and dealers) and security holders. All responses to inquiries on behalf of the Company must be made only by the Company's authorized spokespersons.

If you receive any inquiries of this nature, you must decline to comment and refer the inquirer to the CCO or one of the Company's authorized spokespersons. The Company's policies with respect to public disclosure of internal matters are described more fully in the Company's Communications Policy, which is available on the Company's Intranet.

The Company has designated certain individuals as "spokespersons" who are responsible for communicating with external parties. Only a designated spokesperson of Cano Health may communicate information about the Company to analysts, institutional investors, other stockholders, or representatives of the media.

If you receive an inquiry from a government investigator, please immediately notify the Legal Department. If you are required by Law to respond to the regulator prior to notifying the Legal Department, you should understand that you must provide truthful and accurate information. Anytime you are contacted by a government investigator, you should ask the investigator to provide all document requests in writing.

Good judgment and common sense must be used when utilizing personal social media. Disclosing the Company's confidential information (or that belonging to any of its employees) in your personal social media and other online postings is prohibited. When discussing Cano Health in any public forum, such as social media or personal blogs, and including through private messaging, you must (i) comply with Cano Health's confidentiality policies and procedures; (ii) never appear to be speaking for the Company or any services, products or individuals on its behalf in your personal social media postings; (iii) make clear that any opinions you express are your own. Cano Health's Marketing Department manages its social media channels, and all questions regarding social media use should be directed to the Marketing Department.

f) Marketing

Cano Health is responsible for ensuring compliance with applicable Laws, including CMS'

marketing and communications regulations. Failure to comply with these Laws may result in compliance and/or enforcement actions, including, without limitation, intermediate sanctions and/or civil money penalties. Fair and accurate advertising is essential not only to comply with applicable Laws, but also to preserve the Company's goodwill and reputation. You must not create, approve or disseminate any advertising materials for products and services which are false, misleading or deceptive or not in compliance with applicable Laws. All advertising, whether made through the media, over the Internet, for display or otherwise, must be created by the Marketing Department who must obtain approval by the CCO, in accordance with Company policies, prior to being disseminated.

g) Medical Records Privacy Laws

To maintain patient privacy, and to ensure compliance with all applicable privacy Laws, including the Health Insurance Portability and Accountability Act of 1996 ("**HIPAA**"), the Company is committed to safeguarding data, documents, computers, and other data devices and IT Resources (e.g., laptops, computers, flash drives) that contain patient information. The Company uses and discloses patient information exclusively as permitted or required by applicable Laws. The Company provides each patient its notice of privacy and security practices and protects electronic patient data through reasonable and appropriate technical and administrative safeguards.

As part of the Company's dedication to maintaining patient privacy, you are required to respect and protect confidential information obtained from the Company's patient. You may access, use, or disclose patient information only when necessary to perform your job or as required by Law, and you may access and/or use only the minimum amount of patient information necessary for you to perform your job.

h) We Do Not Engage in Anti-Competitive Behavior

Competition Laws (known as "**antitrust**" Laws in the U.S.) are designed to promote free and open competition. You must comply with antitrust and competition Laws to ensure that we compete aggressively, but fairly, within the limits of legally acceptable business practices, and to protect us from the consequences of any non-compliance. If you have questions about antitrust Laws generally, please contact the CCO.

- **Pricing:** We must always make independent pricing decisions for each of our services and products based on factors such as value to the customer, costs and competitive pressure in the marketplace. The exchange of confidential information with competitors, such as service fees, product prices, profit margins or credit and billing practices, is prohibited. If you have questions about fair pricing, contact the CCO.
- **Tying:** Tying may occur when a consumer is required, as a condition of purchasing one service or product, to also purchase a second, distinct service or product. Tying arrangements should never be implemented without first consulting the CCO.
- **Confidential Information:** We may not exchange any confidential information with a competitor. Confidential information includes any information that is non-public, including, without limitation, costs and pricing. If you believe you have inadvertently disclosed or received confidential information to, from, or about a competitor, you must contact the CCO for immediate guidance.

- **Competitors:** Any agreement, whether formal or informal, or any joint activity involving the Company and any other party, the intent or effect of which is to reduce competition, may violate the antitrust and competition Laws. Any communication with a competitor's representative is particularly susceptible to antitrust scrutiny. Trade association meetings and other industry gatherings often provide a potential pitfall under the antitrust Laws because they bring together competitors – people with common interests and problems – who may discuss matters of mutual concern.

You must avoid any discussion, action or transaction, directly or indirectly, which may involve prohibited conduct, and must immediately report any knowledge of such conduct or raise any questions about what is permissible conduct to the CCO, before any action is taken. You should further consult with the CCO whenever you may have any concerns about proposed conduct that may have an anticompetitive purpose or effect.

i) Honest and Ethical Conduct and Fair Dealing

You should endeavor to deal honestly, ethically and fairly with the Company's suppliers, customers, competitors and employees. Statements regarding the Company's products and services must not be untrue, misleading, deceptive or fraudulent. You must not take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts or any other unfair-dealing practice.

j) Protection and Proper Use of the Company's Assets

You should seek to protect the Company's assets. Theft, carelessness and waste have a direct impact on the Company's financial performance. You must use the Company's assets and services solely for legitimate business purposes of the Company and not for any personal benefit or the personal benefit of anyone else.

k) Corporate Opportunities

You owe a duty to the Company to advance its legitimate business interests when the opportunity to do so arises. You must not (i) divert to yourself or to others any opportunities that are discovered through the use of the Company's property or information or as a result of your position with the Company, unless such opportunity has first been presented to, and rejected by, the Company; (ii) use the Company's property or information or your position for improper personal gain; or (iii) compete with the Company.

l) Political Contributions/Gifts

Business contributions to political campaigns are strictly regulated by various Laws. Accordingly, all political contributions proposed to be made with the Company's funds must be coordinated through and approved by the CCO. You may not, without the CCO's prior written approval, use any Company funds for political contributions of any kind to any political candidate or holder of any national, state or local government office. You may make personal contributions, but you should not represent that you are making contributions on the Company's behalf, unless you have received the CCO's prior written approval.

Further, when you participate in any political activity, you must make explicit that your views are your own, and are not the views of the Company, and you may not use any of the Company's assets in your political participation. Specific questions regarding these activities should be

directed to the CCO.

m) Bribes, Kickbacks and Other Improper Payments

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 the AKS, kickbacks are prohibited. For this reason, the Company does not permit or condone bribes, kickbacks or other improper payments, transfers or receipts.

To comply with the AKS, no director, officer or employee should offer, give, solicit or receive any money or other item of value for the purpose of obtaining, retaining or directing business or bestowing or receiving any kind of favored treatment. Additionally, directly or indirectly giving or offering anything of value in exchange for patient referrals is a violation of the Law.

n) Stark Law

You are required to comply with the “***Stark***” Law, also known as the “self-referral law,” which 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 certain exceptions.

o) False Claims Act (the “FCA”)

The FCA prohibits “knowingly” presenting, or causing to be presented, a “false or fraudulent claim,” or “knowingly and improperly” retaining any government overpayment. To comply with the FCA, you must submit claims for payment or approval that are accurate, truthful, and contain properly documented codes. You must also only bill for goods or services that you provide. The Company has policies and procedures that are designed to detect and prevent fraud, abuse and waste and comply with the FCA, which you are required to comply with.

You have a legal and ethical obligation to assist the Company in preventing fraud, waste, and abuse, and can fulfill that obligation by reporting any suspected or actual fraud, waste, and abuse using by reporting any suspected or actual violations to either the CCO or the HOTLINE.

The Company will not retaliate against you for reporting concerns related to fraud, waste and abuse, or abuse to us, the federal government, state government, or any other regulatory agency with oversight authority. Violations of fraud, waste, and abuse laws applicable to the Company’s business could result in civil monetary penalties, criminal fines and imprisonment, and/or exclusion from federal health care programs and federally funded state health programs.

p) International Trade Controls

U.S. Laws, including, without limitation, the Foreign Corrupt Practices Act, prohibit payment of any money or anything of value to a foreign official, foreign political party (or official thereof), or any candidate for foreign political office for the purposes of obtaining, retaining, or directing of business. Many countries regulate international trade transactions, such as imports, exports and international financial transactions and prohibit boycotts against countries or firms that may be “blacklisted” by certain groups or countries.

You must comply with these Laws even if compliance may result in the loss of some business opportunities. Especially if you are dealing with companies or individuals outside the U.S. as part of your work, you must comply with these Laws that apply to any of your activities outside of the U.S.

q) Accuracy of Records

You must honestly and accurately report all business transactions. You are responsible for the accuracy of your records and reports. Accurate information is essential to the Company's ability to meet its legal and regulatory obligations.

All Company books, records and accounts must be maintained in accordance with all applicable regulations and standards and accurately reflect the true nature of the transactions they record. The Company's financial statements must conform to U.S. generally accepted accounting principles ("**GAAP**") and the Company's accounting policies. No undisclosed or unrecorded account or fund shall be established for any purpose. No false or misleading entries shall be made in the Company's books or records for any reason, and no disbursement of corporate funds or other corporate property shall be made without adequate supporting documentation.

r) Quality of Public Disclosures

The Company must provide full, fair, accurate, timely and understandable disclosure in reports and documents filed with, or submitted to, the SEC and in other public communications.

III. A Safe and Healthy Work Environment

a) Prohibition of Workplace Harassment

You must not engage in any verbal or physical conduct, in any form, that denigrates or shows hostility or aversion toward an individual because of their race, color, sex, religion, age, national origin, disability, veteran status, genetic information or any status protected under applicable Laws, and that: (i) has the purpose or effect of creating an intimidating, hostile or offensive work environment; (ii) has the purpose or effect of unreasonably interfering with an individual's work performance; or (iii) otherwise adversely affects an individual's employment opportunities.

We are committed to protecting the right of our employees and others to work in an environment that is free from sexual harassment. Sexual harassment may include any differential treatment because of gender, unwelcome sexual advances, requests for sexual favors, and verbal, physical or visual conduct or conditions of a sexual nature that have the effect of unreasonably interfering with an employee's work performance or which create an intimidating, hostile or offensive work environment for a reasonable individual.

Every manager is responsible for creating a work environment free of discrimination and harassment. Managers are held accountable for the behavior of other managers and associates under their supervision. Associates who engage in harassment against a colleague because they have raised a concern or question, asked for a reasonable accommodation, reported a violation, or been involved in an investigation, are subject to disciplinary action, up to and including termination of employment or other relationship with the Company.

b) Equal Employment Opportunity

We are dedicated to the goal of providing equal employment opportunity for all employees without discrimination or harassment. Employment decisions (including hiring, employing, promoting, transferring, or discharging from employment) must be made on the basis of merit, and not based on race, color, religion, national origin, sex (including pregnancy), sexual orientation, age, disability, veteran status or any other legally protected classification. We will make reasonable accommodations for any team members with disabilities.

c) Diversity and Inclusion

Different views, backgrounds, and experiences make Cano Health a better company. For this reason, we encourage and support a diverse and inclusive workforce at all levels, where everyone believes they belong and can advance professionally. Cano Health is committed to providing superior primary care for its patients by delivering culturally sensitive care and patient experience, while improving the health, wellness, and quality of life of the communities we serve through local investment, job creation, and outreach activities. We are proud to serve communities that have traditionally been overlooked by the healthcare sector and we bring that same sense of inclusion to our hiring practices, seeking to ensure individuals of all backgrounds are represented in our workforce.

d) Safety and Health

We are committed to eliminating hazards from the workplace and providing employees with a safe and healthy work environment in compliance with all applicable occupational safety and health Laws. Employees are required to report any adverse health or safety incidents or conditions, including broken equipment or machinery and accidents, to the responsible person and through the HOTLINE or to the CCO.

e) Violence-Free Workplace

We will not tolerate any level of violence, or threats of violence, in the workplace. Relatedly, firearms and other weapons are not permitted on Company property, except with the CCO's advance express written permission-even if you have a license or permit to carry such a weapon. Any violation of this provision should be reported immediately to the CCO and the Head of Global Security. In the event of a workplace emergency, you should dial 911 or the applicable emergency services number.

f) Alcohol and Drugs

Employees are required to comply strictly with Cano Health's policies regarding the use of alcohol and the possession, sale and use of illegal drugs. You are prohibited from being under the influence of alcohol or drugs (including unlawful use of legal medications) when performing your duties. To promote productivity, protect the safety of others, and ensure compliance with the Law, illegal drugs are strictly forbidden.

IV. COMPLIANCE PROCEDURES

a) Communication of the Code

We will provide this Code to you upon hire and periodically thereafter and you must acknowledge

having read it and agree to abide by it. Updates of the Code will be provided from time to time. You may access the Code on the Company's website at <https://www.canohealth.com/> or by requesting a copy from the CCO.

b) Monitoring Compliance and Disciplinary Action

Our management, under the supervision of its Board of Directors or a committee thereof or, in the case of accounting, internal accounting controls, auditing or securities Laws matters, the Audit Committee, shall take reasonable steps from time to time to (i) monitor compliance with the Code, and (ii) when appropriate, impose and enforce appropriate disciplinary measures for violations of the Code.

Disciplinary measures for violations of the Code will be determined in the Company's sole discretion and may include, without limitation, mandatory supplemental training and counseling, oral or written reprimands, warnings, probation or suspension with or without pay, demotions, reductions in salary, termination of employment or service, and restitution (including, without limitation, disgorgement to the Company of personal gains or profits obtained from activities in violation of this Code).

The Company's management shall periodically report to the Audit Committee on these compliance efforts, including, without limitation, periodic reporting of alleged violations of the Code and the actions taken with respect to any such violation.

c) Reporting Concerns and Receiving Advice

Be Proactive. You must act proactively by asking questions, seeking guidance and reporting suspected violations of the Code and other Company policies and procedures, as well as any violation or suspected violation of applicable Laws arising in the conduct of the Company's business or occurring on the Company's property. If you believe that actions have taken place, may be taking place, or may be about to take place that violate or would violate the Code or any applicable Laws, you must bring the matter to the Company's attention, by reporting it to either the CCO or the HOTLINE.

Seeking Guidance. Your best starting point for seeking advice on issues related to the Code will usually be your supervisor. However, you should contact either the HOTLINE or the CCO if (i) the conduct in question involves your supervisor (ii) you have reported the conduct in question to your supervisor, but you believe that they are not dealing with it properly, or (iii) for some other reason you believe you cannot discuss the matter with your supervisor.

Reporting Violations. You must report all instances of suspected or actual violations of this Code or applicable Laws via either the HOTLINE Navex platform or to the CCO. Managers who are made aware of suspected or actual violations of this Code or applicable Laws have an obligation to report through these channels. Reports can be made openly or anonymously.

There are 4 ways to report to the HOTLINE:

1. Web Form: <http://canohealth.ethicspoint.com/>
2. Mobile: QR Code (will appear on posters) OR <https://canohealth.navexone.com/>
3. Telephone Line: 844-323-3391
4. Intake Form: Through a center manager

Alternatively, you can report the matter to the CCO via email at compliance@canohealth.com.

Special note regarding Accounting, Securities Law and Similar Concerns: While any concerns or questions regarding potential violations of the Code, any other Company policy or procedure or applicable Laws involving accounting, internal accounting controls, auditing or securities law matters must be reported to the HOTLINE or the CCO, you may also report such matters to the Audit Committee or a designee of the Audit Committee. You may communicate with the Audit Committee or its designee in writing to: Chair of the Audit Committee, c/o Cano Health, Inc., 9725 NW 117 Avenue, Miami, FL 33178; by e-mail to compliance@canohealth.com (note that with email, anonymity cannot practically be maintained); or, by calling the HOTLINE and asking that the matter be forwarded to the Chair of the Audit Committee.

This Code shall also not be construed to prohibit you from testifying, participating or otherwise assisting in any state or federal administrative, judicial or legislative proceeding or investigation.

d) Misuse of Reporting Channels

You must not use these reporting channels in bad faith or in a false or unreasonable manner. Further, the HOTLINE should not be used to report grievances that do not involve violations of the Code, Company policies and/or Laws or other ethics-related issues.

e) Reporting; Anonymity

When reporting suspected or actual violations of the Code, we prefer that you identify yourself to facilitate our ability to take appropriate steps to address the report, including conducting an appropriate investigation. However, we also recognize that some people may feel more comfortable reporting a suspected violation anonymously, whether due to the circumstances of the situation or otherwise.

If you wish to remain anonymous when reporting, you may do so, such as through the HOTLINE. We will use reasonable efforts to protect your confidentiality, subject to applicable Laws. If you report anonymously, however, we may not have sufficient information to review, investigate and/or evaluate the allegations. Accordingly, if you report anonymously, you should provide as much detail as possible to permit us to properly evaluate the matter set forth in your anonymous report and, if appropriate, commence and conduct an appropriate investigation.

f) Non-Retaliation

We expressly forbid any form of retaliation against any person who, acting in good faith on the basis of a reasonable belief, reports suspected violations of this Code, Company policies and/or applicable Laws or who participates in a subsequent investigation of such concerns. We also prohibit any form of retaliatory action against anyone who raises concerns or questions regarding ethics, discrimination, or harassment matters; requests a reasonable accommodation for a disability, pregnancy or religious belief.

Specifically, we will not discharge, demote, suspend, threaten, harass or in any other manner discriminate against any such person in the terms and conditions of their employment. Any person who participates in any such retaliation is subject to disciplinary actions, up to and including termination.

Accordingly, you must not discharge, demote, suspend, threaten, harass or in any other manner

discriminate or retaliate against anyone reporting a suspected or actual violation of this Code, Company policies and/or Laws who was acting in good faith on the basis of a reasonable belief, unless it is determined that the report was made with such reporting person's knowledge that it was false when reported.

Retaliation is a serious issue and includes any adverse action taken because an associate has engaged in such activity. As part of any investigation, we respect the rights that are afforded under applicable Laws to all parties related to the matter.

g) Everyone's Responsibilities

We share a common responsibility to ensure that our decisions are in our patients' and our stockholder best interests. We hold ourselves to the highest standards of ethics and professional behavior in dealing with our patients and associates, peers, stockholders, colleagues, the communities we serve, and each other.

To protect Cano Health's reputation for integrity and be the best for our patients and associates, you must:

- Understand and comply with all Laws and Company policies and procedures applicable to your business.
- Act in accordance with the values, principles and standards expressed in this Code, and apply them every day, to everything you do, and in every decision you make.
- Conduct business in a manner that is fair and transparent. This includes a commitment to honesty in our dealings and communications with our patients, associates, and each other.
- Take responsibility for your decisions and actions and hold others accountable.
- Immediately report any suspected or actual violations of this Code, Company policies or the Law to either the HOTLINE or the CCO.
- Fully cooperate with any investigation into alleged violations of this Code, Company policies or the Law and be truthful and forthcoming during such investigations.

h) Managers' Responsibilities

We expect all associates to be leaders, but we recognize that our managers in particular are role models who must lead by example and inspire their teams to live our values.

As role models, managers must:

- Regularly reinforce the importance of understanding and following our Code, Mission and Guiding Principles, and the policies and procedures that apply to their associates' daily job responsibilities.
- Understand the risks inherent in their associates' work and play an active role in assuring the quality of that work.

- Encourage associates to speak up and raise concerns, especially about potential legal or ethical issues, and foster a work environment where they feel comfortable doing so.
- Listen to associates who raise concerns and take their concerns seriously.
- Ensure all concerns are properly resolved or promptly escalated through appropriate channels.
- Promote awareness of all resources available for seeking advice or reporting concerns, including the Compliance HOTLINE.
- Not engage in or tolerate retaliation of any kind and clearly communicate the Company's prohibition of workplace retaliation.
- Recognize associates who act in accordance with our values.
- Managers have a duty if they become aware of any violations of this Code, such as wrongful behavior, workplace misconduct, harassment, and/or discrimination, to promptly report these matters either to the HOTLINE or the CCO.

i) Cooperation

You must cooperate with the Company in any investigation of a potential violation of the Code, any other Company policy or procedure, or any applicable Laws.

j) Waivers and Amendments

No waiver of any provisions of the Code for the benefit of any of the Company's directors or executive officers shall be effective unless: (i) approved by the Board of Directors or, if permitted, a committee thereof, and (ii) if applicable, such waiver is promptly publicly disclosed in accordance with applicable Laws.

Any waivers of the Code for other employees may be made by the CCO, the Board of Directors or, if permitted, a committee thereof.

All substantive amendments to the Code must be approved by the Board of Directors or a committee thereof and, if applicable, must be promptly publicly disclosed in accordance with applicable Laws. The CCO has the authority to approve non-substantive changes to the Code.

Effective Date: June 3, 2021

Last Reviewed: May 17, 2023

Last Revised: May 17, 2023

ACKNOWLEDGMENT:

I acknowledge that I have reviewed and understand Cano Health's Code of Business Conduct and Ethics (the "Code") and agree to abide by the provisions of the Code.

Signature

Name (Printed or typed)

Position

Date