

Oscar Health, Inc. Code of Conduct

Summary of Changes

On October 26, 2022, Oscar Health, Inc. (“Oscar”) made the following amendments to the Code of Conduct (the “Code”):

- Revised the description of situations that might reasonably be expected to give rise to a conflict of interest to include outside employment by, or service to, a company that has a material relationship with Oscar even if the company is not a material customer, supplier or competitor of Oscar.
- Revised the definition of “material supplier” to include individuals and entities that have received payments from Oscar in the past year in excess of (i) \$1,000,000 or (ii) 2% of the supplier’s gross revenues, or 2% of Oscar’s gross revenues, in the case of (i) and (ii), whichever is greater.
- Clarified employees’ responsibilities with respect to gifts, prizes and business entertainment, and procedures for reporting these to Oscar’s Compliance Department.

In addition, Oscar made certain other changes to the Code, including those of a technical, administrative and non-substantive nature.