Oscar Health, Inc. Code of Conduct

Summary of Changes

On January 1, 2026, Oscar Health, Inc. ("Oscar") amended its Code of Conduct (the "Code") to enhance the description of the company's continued commitment to accurate and complete regulatory reporting, to set forth the company's policy on the requirements under the Lobbying Disclosure Act and to clarify the procedures for handling third parties' competitively sensitive information.

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