



# Compliance Code of Conduct.

NOVEMBER 2023

# Message from the CEO.

As OneTeam, we at agilon health have established and continue to enjoy a very positive reputation across our industry. This reputation is the direct result of your hard work and relentless pursuit of reimagining health care by enabling our physician partners to practice medicine the way they were trained and provide care that seniors deserve.

Our reputation, while built on how we each do our jobs, every day, influences so many important factors in our ability to achieve long-term success — the way our physician partners value our services; whether 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 future growth and impact on physician partners and seniors across the U.S. 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 commitment to being a trusted partner to our physician groups and to support our ability to achieve long-term success, we have adopted this Code of Conduct. This document applies to all of us. All employees of agilon health are responsible for knowing the Code of Conduct and for abiding by the high legal, ethical, and moral standards it contains. In addition, every employee of agilon health is required to be familiar with and comply with all federal and state laws, rules, and regulations that govern their role within the organization. If you are unfamiliar with any of these standards or 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 ethical and legal standards. Our Code of Conduct obligates us to avoid any conduct that goes against these principles and standards — or any conduct that even raises the appearance of impropriety — and to hold ourselves to even higher ethical standards than the legal rules require. Breaches of our Code of Conduct will be taken very seriously.

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



Steve Sell  
Chief Executive Officer

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## Scope and Overview.



Through our Compliance Program, we want everyone to feel like they can tell us about any compliance issues that may exist now and in the future.



## PURPOSE

In creating this Code of Conduct, agilon health, inc.'s (also referred to as "our" or "we" throughout this document) goal is to ensure all employees are aware of and understand the laws, rules, and regulations that guide agilon and its subsidiaries. To do this, we have put in place practices to be followed by all employees, members of the Board of Directors, and other stakeholders.

## EMPLOYEES AND AFFILIATES

This Code of Conduct lays out the standards of conduct and procedures that all directors, officers, and employees of agilon health are required to follow (these individuals will be referred to as "employees", "affiliates" or "you").

All employees must read and understand this Code of Conduct and its supporting policies and procedures upon hire and annually thereafter.

## RESPONSIBILITIES OF SUPERVISORS AND MANAGERS

agilon strives to create an environment where everyone feels comfortable raising concerns. As such, leaders must create and allow for a space where you can bring up ethical, compliance and legal concerns at any time to anyone. Leaders are also responsible for ensuring their team members:

- understand this Code of Conduct, our policies, and the Compliance Program
- are aware of the Compliance Program's standards and the procedures for reporting suspected unethical, illegal, or improper activity
- are protected from retaliation or intimidation if they think there is wrongdoing or unethical or illegal behavior and speak up in good faith

## RAISING QUESTIONS AND CONCERNS

Neither this Code of Conduct nor our overall Compliance Program can cover every situation you may face. In any case where you are not sure, you should contact our Chief Ethics, Compliance & Risk Officer, your immediate supervisor, manager, or Human Resources. You can also submit a report using our Compliance Hotline. All reports to Compliance will be promptly and thoroughly investigated.

**you must review and be familiar with our established policies, procedures and compliance program.**



## ANONYMITY AND CONFIDENTIALITY

You may choose to remain anonymous when reporting questions or concerns to the Compliance Hotline. In addition, all reports will be held in the strictest confidence possible, consistent with the need to investigate the matter and applicable law<sup>1</sup>.

## NON-RETALIATION AND NON-INTIMIDATION

If you, in good faith, report compliance or ethics issues, questions or concerns, you will be protected from retaliation or intimidation. Any retaliation or intimidation for good faith reporting is against our Compliance Program's Policies and our Code of Conduct and will result in disciplinary action, up to and including termination. If you believe that you have been retaliated against by anyone for reporting conduct that you believe is a violation, you may file a complaint with the Chief Ethics, Compliance & Risk Officer.

## CONTACT INFORMATION

The contact information for agilon health's Compliance Department, the Compliance Hotline and the Compliance web form can be found in the Contact Sheet attached to this Code of Conduct.

**good faith reporting is  
protected from retaliation  
and intimidation.**



<sup>1</sup>Specifically, 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.

# Code of Conduct.



**BE HONEST & TRUTHFUL**  
Try to always do the right thing,  
both ethically and legally.



**agilon health has adopted the following Code of Conduct as a central part of our Compliance Program.**

The Code of Conduct highlights the standards that you are expected to follow, including being honest and avoiding any behavior that could reflect poorly on agilon.

Compliance with agilon health's Code of Conduct is required as part of your employment, and breaking these standards will result in disciplinary action, up to and including termination. This Code of Conduct does not in any way represent an employment agreement or assurance of continued employment. It is only for agilon health's purposes and may not be relied upon by any other party.

**MISSION AND VALUES**

We are committed to our 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. We will carry out our mission with the highest ethical standards and will act in compliance with all applicable federal and state laws, rules, and regulations. This commitment extends to all our interactions, including those with physician partners, payors, third-party contractors, service providers, and government entities.

You are expected not only to act in compliance with all applicable laws and regulations but also to avoid any behavior that raises the appearance of misconduct. While the legal rules are important to follow, we strive to hold ourselves to higher ethical standards.

In short, we do not and will not allow any form of unlawful or unethical behavior by anyone associated with agilon health. We expect and require you to be law-abiding, honest, trustworthy, and fair in all your business dealings. The Compliance Program has become an integral part of our mission and business operations to meet these expectations.

**OBLIGATION TO CREATE AND MAINTAIN AN ETHICAL WORKPLACE**

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

- Perform all services with professionalism and honest behavior, always following applicable laws and regulatory requirements
- Comply with all applicable federal and state laws and regulations, and agilon health's policies, including those addressing fraud, waste and abuse; patient privacy, including the Health Insurance Portability and Accountability Act of 1996 ("HIPAA")<sup>2</sup>; and employees' health, safety, and welfare in the workplace
- Set an example through your behavior
- Avoid situations that may cause, or appear to cause, conflicts of interest with agilon health and its business, including cases where personal interests or conflict or could be perceived as conflicting with agilon health's business interests
- Ensure marketing practices are compliant with applicable federal and state requirements and avoid any business that can only be obtained by improper or illegal means
- Create a workplace that is free from harassment and discrimination
- Understand our policies on records retention and confidentiality and abide by all applicable federal and state laws, regulations, and contractual requirements

<sup>2</sup>As amended, and regulations promulgated thereunder.





**Be Honest and Truthful.** Employees should strive to do the right thing, both ethically and legally. Employees should avoid any behavior or action that is unethical, illegal, or improper. Do not help anyone at agilon health or elsewhere engage in unethical or illegal conduct. Do not “look the other way” if you think or become aware that anyone associated with agilon health is acting unethically.

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

Understand and follow the laws, rules, and regulations that govern agilon’s business, including insider trading laws that prohibit the use of material, non-public information when trading in or recommending Company securities<sup>3</sup>. You may not trade in Company securities based on material, non-public information (“Insider Trading”). Further, if you have material, non-public information, you may not communicate such information to third parties (“Tipping”). These restrictions also apply to securities of other companies if you learn of material, non-public information during your duties for us. In addition to violating Company policy, Insider Trading and Tipping are illegal.

**Cooperate with the Compliance Program.**

Our Compliance Program works well only if everyone works together to help make sure it is successful. You should understand what is required under the law and this Code of Conduct, and work to ensure that the standards and policies we adopt are always being followed. You are expected to cooperate with any compliance review, inquiry, or investigation conducted by the Chief Ethics, Compliance & Risk Officer or their designee. You must also attend all required compliance meetings and training sessions and report any suspected compliance or ethics issues. If you do not understand the expectations under the Compliance Program, you should ask questions.

**Standards Relating to Government Contracts.**

We must conduct ourselves and our business in accordance with all applicable laws, rules, and regulations<sup>4</sup>. Please refer to our policies and procedures related to business and other interactions with the Government.

**Workplace Practices.** We realize our most valuable asset is our workforce. agilon health is committed to providing every employee with a safe working environment. We treat each other with respect and collaborate to reach our goals. We do not allow discrimination, harassment, or retaliation. Behaviors that put our employees or business partners at risk are not allowed. Please contact the Compliance Hotline or the Compliance Department directly if you have any concerns.

Partnership and collaboration are part of our Company values and commitments that help to guide our everyday actions in executing our mission. We act as one team, collaborate deeply, and embrace diversity in every aspect of our business. We believe in respect for all employees. We value individual differences in race, ethnicity, national origin, gender, sexual orientation, gender identity, disability, religious affiliation, veteran status, and other areas. Our diversity makes us stronger and more successful.

**employees should  
strive to do the right  
thing, both ethically  
and legally.**

<sup>3</sup> In accordance with applicable federal and state law, all Covered Persons must abide by the agilon health Policy on Trading in Securities.

<sup>4</sup> Includes 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.



**Political or Other Contributions.** You are free as a private citizen to participate in the political process, express your political views, or advocate for religious and charitable organizations. However, your participation should not:

- Interfere with the satisfactory performance of your role at agilon
- Incorrectly imply agilon's endorsement
- Create an actual or perceived conflict of interest

You must also comply with all campaign finance and ethics laws. Our funds, services, facilities, or assets may not be used on behalf of a political party or candidate for an elected office. Please contact the Chief Ethics, Compliance & Risk Officer with any questions or concerns about political or other contributions.

**Corporate Opportunities.** You may not use agilon property, information, or a position with us for any personal benefit. In addition, you must always act to protect these assets from loss, damage, misuse, theft, removal, and waste. You must make sure that our assets are used only for legitimate business purposes. Finally, you may not use workplace property, information, or a position with us to pursue a business opportunity for your own or any related person's benefit.

If you have any questions about the proper use of assets and information, please reach out to the Compliance Department.

**Conflict of Interest.** A conflict of interest occurs when your personal interests could compromise, or appear to compromise, your judgment, decisions, or actions in the workplace. Conflicts of interest also occur when you, or a member of your family, receive improper personal benefits because of your position in the Company. You should not engage in any activity during your relationship with agilon health that could conflict or appear to conflict with the best interests of the Company. You must avoid actual, potential, or perceived conflicts of interest with agilon health in your professional relationships, including those that may arise in personal relationships due to your position with us.

You have a responsibility to inform the Compliance Department of any transaction or relationship that you feel could result in an actual, potential, or perceived conflict of interest. This information must be provided upon hire, annually during compliance training, and as conflicts arise or the nature of previously disclosed conflicts change.

**Retention of Records.** We are committed to keeping complete and accurate records in compliance with sound business practices and applicable laws and regulations. All employees must retain records in accordance with agilon health's Record Retention policy and must seek guidance from the Compliance Office when unsure of if and/or how to retain records.

**Ineligible Persons and Exclusion Checks.** As a direct contracting entity with CMS and a downstream vendor of Medicare Advantage health plans, agilon health is prohibited from employing or engaging with any individual or entity that has been excluded from participating in federally funded health programs, including Medicare and Medicaid. As such, agilon screens all employees, partners, contractors, and vendors against exclusion databases, including but not limited to the OIG and GSA databases, to make sure that they have not been excluded from participating in federal or state healthcare programs. Employees are screened prior to hire and vendors are screened prior to engagement, and all individuals and entities are screened monthly for the duration of their employment or engagement with agilon.

## STANDARDS RELATING TO BUSINESS PRACTICES

**Business Practices.** We will decline any business transaction or opportunity that can only be obtained by unethical, illegal, or improper means. We will not offer, pay, solicit, or receive any unethical, illegal, or inappropriate payments.



**Business Transactions.** Business transactions will be based on the actual financial value of the transaction and its positive impact on our business. You must deal fairly with our physician partners and their patients, payor partners, vendors, suppliers, competitors, and each other. These transactions will not be based on intent to encourage or reward referrals or other business between us and others with whom we do business.

During our day-to-day operations, you may deal with a variety of individuals, companies, organizations, and government agencies. In those dealings, you must never make any misrepresentations, dishonest statements, or statements meant to mislead or to misinform. In addition, you should not take advantage of anyone by manipulating, hiding, abusing privileged information, misrepresenting material factors, or any other unfair practice. If it appears that anything you have said has been misunderstood, you need to inform your supervisor to determine how best to correct it.

**Purchasing Policy.** All purchasing decisions must be made to obtain the highest quality service or item for use at the most reasonable price and must be consistent with all applicable laws. This includes, and 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.** You may not engage in any corrupt business practice. This includes bribery, kickbacks, or payoffs intended to influence, or reward favorable decisions of any:

- physician partner or their patients
- providers, payors, or other referral sources
- government representative
- contractor or vendor
- any other person in a position to benefit agilon health or yourself in any way

**Giving Payments or Gifts.** Gifts or other items may be offered to another person only if they are within limits outlined in agilon health's Gifting Practice Policy. It must be clear from the circumstances that they are given only as friendship or business hospitality tokens. They cannot be provided with an intent to encourage referrals or appear that they are given with such purpose.

Gifts of cash or cash equivalents (e.g., gift certificates) that are not part of an approved incentive program are strictly prohibited. Meals of fair value may be offered only in connection with informational or educational presentations.

Gifts of any amount, including meals, 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.** You may not accept any gifts, gratuities, or other favors under circumstances in which it appears the action is for your own benefit. 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.

Complimentary meals from suppliers or other vendors may not be accepted unless such meals are of modest value and also given with an informational or educational presentation. If you are unsure if you can receive a gift you have accepted or been offered, including if the gift is considered "nominal," contact the Compliance Department.

**never make any  
misrepresentations,  
dishonest statements,  
or statements meant to  
mislead or to misinform.**



## STANDARDS RELATING TO REFERRALS

**Compliance with Federal and State Anti-Referral Laws.** Anti-kickback laws make it a crime to give or receive anything in exchange for a referral or encouragement to provide healthcare services paid for by any federal or state healthcare program.

A kickback is an improper payment, gift, service, or item of value offered or received in return for increased business, including patient referrals. Under federal and state anti-kickback statutes, kickbacks are prohibited. Directly or indirectly, giving or offering anything of value in exchange for patient referrals is breaking the law.

Under these rules, we do not pay or offer any compensation to anyone, either directly or indirectly, for referrals or other business. We do not ask for or accept any compensation to refer our physician partners' patients or business to other providers, suppliers, or anyone else. This includes giving any form of payment, including anything of value, in return for a referral. You may not take, seek, or provide kickbacks in return for referrals. You must also ensure that any business dealings with referral sources are at fair market value and negotiated fairly on price, and neither party is giving the other a better or worse deal than the market standards because of an existing relationship between them.

### **Relationships with Health Care Providers.**

The "physician self-referral law," also known as the "Stark" law, prohibits a physician from referring Medicare patients for "designated health services" or ordering these services from a provider where the physician has a compensation or ownership arrangement. We understand that there may be instances where the arrangement meets an exception – all such exceptions must be reviewed and receive prior approval by agilon's Legal department.

All individuals and entities with whom we have a referral relationship or do business (e.g., through contracts, leases, and other financial

relationships) must comply with anti-referral laws. For example, we will not provide free services, items, or other benefits to any party with whom we have a relationship, nor will we enter into questionable business relationships to further a referral relationship.

**Marketing Activities.** We will comply with all applicable marketing regulations and guidelines<sup>5</sup>. We will not engage in activities prohibited by law. This includes:

- offering sales or appointment forms to patients
- accepting enrollment applications
- mailing marketing materials on behalf of a plan sponsor
- offering bribes to persuade patients to enroll in a particular plan
- receiving compensation in any form from a plan sponsor in exchange for soliciting patients

All agilon health marketing activities and advertising must be based on the quality and/or value of our services. We must never promise rewards for referrals or other business.

Marketing activities and advertising must be truthful and must be supported by evidence to verify all statements made. Our best advertisements are proven by the quality of our services. You should not criticize the service or business of a competitor with false or misleading statements.

**we shall comply with all applicable marketing regulations and guidelines, including appropriate disclaimers on marketing materials.**

<sup>5</sup>This includes 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.



## STANDARDS RELATING TO COMMUNICATIONS

We have assigned specific individuals the responsibility to communicate with third parties such as securities market professionals, the media, policy makers and shareholders on behalf of agilon health. Unless you have been designated to speak on behalf of agilon health, you should refer all inquiries to our Communications & Public Affairs and Investor Relations Departments.

We understand that you may use social media accounts or platforms. Before posting any information, you must confirm that any post complies with this Code of Conduct and our other policies, including our Social Media Policy. You are not permitted to disclose any confidential information or discuss any agilon health business without authorization from the Communications & Public Affairs and Investor Relations Departments.

## STANDARDS RELATING TO CONFIDENTIALITY

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

We must observe all confidentiality requirements of HIPAA<sup>6</sup>, and other applicable laws, rules, and regulations governing the privacy of medical records and information. The laws concerning the privacy and security of health information are comprehensive and cover many of our business activities. You are required to keep protected health information and personally identifiable information in the strictest confidence. Such information will not be disclosed to anyone unless and as allowed by applicable law.

Any disclosure of personal health information or personally identifiable information will be made on a need-to-know basis, in compliance with the HIPAA regulations or other applicable laws, rules, and regulations. Disclosures will consist of the minimum amount of information needed to perform the function. Any suspected or actual breach of such information must immediately be reported to the Chief Ethics, Compliance & Risk Officer. Please refer to our Privacy policies for additional information.

**Confidential Business Information.** While working at agilon health, confidential information you acquire must also be held in confidence and may not be used for personal gain by anyone. Such information includes:

- patient lists/information of our physician partners
- development plans, marketing strategy, financial data, and proprietary information
- information about pending or contemplated business deals

You should make sure information is kept safe and secure. You should limit access to the information to those who need to know and avoid discussing confidential information in public areas. Examples include elevators, hallways, lobbies, airplanes, restrooms, and public transportation or facilities. Confidential information may be given to others when authorized by agilon health or as legally mandated. You are required to preserve confidential information even after termination of employment.

## RESPONDING TO IMPROPER CONDUCT

This Code of Conduct will be enforced consistently, without regard to your position with agilon health. If you violate this Code of Conduct, you will face disciplinary action. The Supervisor and Manager of a disciplined individual may also face disciplinary action for their failure to properly oversee conduct or for retaliation against anyone who reports a violation.

Our response to misconduct will depend on many things, including if 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. You should be aware that specific actions and omissions are prohibited by the Code of Conduct and might be crimes that could lead to individual criminal prosecution, including fines and imprisonment.

<sup>6</sup>As amended by the Health Information Technology for Economic and Clinical Health Act of 2009 (the "HITECH Act").



## INVESTIGATIONS

The Compliance Department maintains and oversees the Compliance Hotline and other methods for reporting potential compliance issues. The staff responsible for supervising these reporting tools will submit all reports or complaints received to the Chief Compliance Officer.

Any reports received relating to our financial statements, accounting, internal controls, or auditing matters will be reported by the Chief Ethics, Compliance & Risk Officer to Internal Audit. No person who is the subject of a complaint will receive such a notification. In conjunction with Internal Audit personnel, the Chief Ethics, Compliance & Risk Officer will undertake an initial investigation on behalf of the Audit Committee to determine if the reported information can be proven. Upon receiving the initial investigation results, the Internal Auditor, in communication with the Audit Committee, will determine if any further action is needed to resolve the complaint.

Upon receiving any complaints relating to other matters covered by this Code of Conduct, the Chief Ethics, Compliance & Risk Officer, or their designee, will conduct an initial investigation and determine if further action is needed to resolve the complaint.

The Chief Ethics, Compliance & Risk Officer will maintain a log of all complaints received, tracking their receipt, investigation, and resolution. The Chief Ethics, Compliance & Risk Officer will provide a quarterly summary report to the Compliance Committee and the Board for all complaints received.

All information revealed during an investigation will remain confidential unless necessary to conduct, conclude, and, if appropriate, prosecute the offense or as otherwise required by applicable law. When reports are received anonymously, the reporter may not be informed of the results of an investigation.

You must promptly assist and provide accurate information in connection with any investigation conducted by the Compliance Department.

## WAIVERS

Waivers or exceptions to the Code of Conduct will be granted only in advance and 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. It must be disclosed to shareholders per applicable law and exchange requirements.

## AGILON HEALTH COMPLIANCE PROGRAM

Our Compliance Program, our policies, and our procedures provide guidance in maintaining appropriate business practices. The Chief Ethics, Compliance & Risk Officer is responsible for overseeing and managing all aspects of the Compliance Program. Our Compliance Committee has been established to assist, advise, and guide the Chief Ethics, Compliance & Risk Officer in meeting the Compliance Program goals.

The primary components of our Compliance Program include the following:

- 1 Written Policies and Procedures
- 2 Designation of a Chief Ethics, Compliance & Risk Officer and a Compliance Committee
- 3 Conducting Effective Training and Education
- 4 Developing Effective Lines of Communication
- 5 Enforcement Through Publicized Disciplinary Guidelines
- 6 Auditing and Monitoring
- 7 Promptly Responding to Detected Incidents, Developing Corrective Action, and reporting to appropriate Authorities
- 8 Whistleblower Protection and Non-Retaliation for Employees' Reports of Non-Compliance

# Compliance Contact Sheet.

## CONTACT THE DEPARTMENT DIRECTLY:

Tim Feher  
Chief Ethics, Compliance & Risk Officer  
Tim.Feher@agilonhealth.com  
(657) 208-2449

Compliance Department Email:  
ComplianceAH@agilonhealth.com

## ANONYMOUS REPORTS CAN BE MADE TO:

Hotline:

- US: (833) 591-0655
- India: 000 800 0501 552
- Other countries: 800 31 26 4001

Online:

<https://report.syntrio.com/agilonhealth>





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