agilon health



Compliance Code of Conduct.

DECEMBER 2025

Table of Contents.

SCOPE AND OVERVIEW 1

PURPOSE 2

WORKFORCE MEMBERS 2

RESPONSIBILITIES OF SUPERVISORS AND MANAGERS 2

RAISING QUESTIONS AND CONCERNS 2

ANONYMITY AND CONFIDENTIALITY 3

NON-RETALIATION AND NON-INTIMIDATION 3

CONTACT INFORMATION 3

CODE OF CONDUCT 4

MISSION AND VALUES 5

OBLIGATION TO CREATE AND MAINTAIN AN ETHICAL WORKPLACE 5

- Be Honest and Truthful 6
- Comply with All Legal and Ethical Requirements 6
- Cooperate with the Compliance Program 6
- Standards Relating to Government Contracts 6
- Workplace Practices 6
- Political or Other Contributions 7
- Corporate Opportunities 7
- Conflict of Interest 7
- Retention of Records 7
- Ineligible Persons and Exclusions Checks 7

STANDARDS RELATING TO BUSINESS PRACTICES 7

- Business Practices 7
- Business Transactions 8
- Purchasing Policy 8
- Payments, Gifts, and Entertainment 8
- Giving Payments or Gifts 8
- Accepting Payments or Gifts 8

STANDARDS RELATING TO REFERRALS 8

- Compliance with Federal and State Anti-Referral Laws 8
- Relationships with Health Care Providers 9
- Marketing Activities 9

STANDARDS RELATING TO COMMUNICATIONS 9

STANDARDS RELATING TO CONFIDENTIALITY 10

- Confidential Protected Health Information 10
- Confidential Business Information 10

RESPONDING TO IMPROPER CONDUCT 10

INVESTIGATIONS 11

WAIVERS 11

AGILON HEALTH COMPLIANCE PROGRAM 11

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 "agilon health," "agilon," "our" or "we" throughout this document) goal is to ensure all Workforce Members are aware of and understand the laws, rules, and regulations that guide agilon.

WORKFORCE MEMBERS

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

You must read and affirm your understanding and agreement to abide by this Code of Conduct and its supporting policies and procedures upon joining or otherwise engaging with agilon, 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 and our related policies and activities that, when taken together, comprise agilon's 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 Compliance, Legal, your immediate supervisor, or Human Resources. You can also submit a report using our Compliance Hotline - US: (833) 591-0655/India: 000 800 0501 552/All other international callers: 800 31 26 4001. All reports will be promptly and thoroughly investigated.

You must review and be familiar with agilon's 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[1].

NON-RETALIATION AND NON-INTIMIDATION

If you, in good faith, report a compliance or ethics issue, question or concern, you will be protected from retaliation and intimidation. Any retaliation or intimidation for good faith reporting is a violation of agilon policy and this Code of Conduct and will result in disciplinary action, up to and including termination. If you believe that you have been retaliated against for reporting conduct that you believe is a violation, you may file a complaint with your supervisor, another member of agilon management, Human Resources or Compliance.

CONTACT INFORMATION

Contact the department directly:

- Chief Compliance Officer: (614) 423-6011
- 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

This Code of Conduct is posted on agilon's website at agilonhealth.com.

> Good faith reporting is protected from retaliation and intimidation.



[1]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.





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.

Your employment or engagement with agilon health requires continued compliance with agilon health's Code of Conduct, and breaking or otherwise violating these standards can result in disciplinary action, up to and including termination[2].

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 compliance with the legal rules are important to follow, we strive to hold ourselves to higher ethical standards.

We expect and require you to be law-abiding, honest, trustworthy, and fair in all work you conduct on behalf of agilon. The compliance program is 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, and Workforce Members' health, safety, and welfare in the workplace
- Set a positive 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 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.

[2]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.



Be Honest and Truthful. Workforce Members should strive to do the right thing, both ethically and legally, and should avoid any behavior or action that is unethical, illegal, or improper. Do not help anyone at agilon 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[3]. 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 work for agilon. In addition to violating Company policy, such activities are illegal. Please refer to our Insider Trading Policy for more information.

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 or at the direction of the Compliance or Legal departments. You must also attend or complete all required compliance training sessions and report any suspected compliance or ethics issues. If you do not understand the expectations under the Compliance Program, you should seek guidance from your supervisor or the Compliance Department.

Standards Relating to Government Contracts. As an organization that enters into contracts with the federal government, it is critical that we conduct ourselves and our business in accordance with all applicable laws, rules, and regulations[4]. Please refer to our Lobbying and Anticorruption policies and seek additional guidance as needed from Legal, Compliance, or Communications & Public Affairs.

Workplace Practices. We realize our most valuable asset is our workforce and we are committed to providing every Workforce Member 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 Workforce Members 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 inclusion in every aspect of our business. We believe in respect for all Workforce Members. We value individual differences in race, ethnicity, national origin, gender, sexual orientation, gender identity, disability, religious affiliation, veteran status, and other areas. Our inclusiveness makes us stronger and more successful.

[3] In accordance with applicable federal and state law, all Covered Persons must abide by the agilon health Insider Trading Policy.

[4] 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. Company funds, services, facilities, or assets may not be used on behalf of a political party or candidate for an elected office. Please contact Compliance or Communications & Public Affairs with any questions or concerns about political or other contributions.

Corporate Opportunities. You must always act to protect agilon property and information from loss, damage, misuse, theft, removal, and waste. You must make sure that our assets are used only for legitimate business purposes, and you may not use workplace property, information, or a position with us to pursue your own or any related person's benefit in a manner that violates this Code of Conduct or other Company policies. 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 that could conflict or appear to conflict with the best interests of the Company.

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, as potential conflicts arise, and as 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 Workforce Members must retain records in accordance with agilon's Data Retention and Disposition Policy and must seek guidance from Legal or Compliance when unsure of how to retain records.

Ineligible Persons and Exclusion Checks. As a direct contracting entity with the Centers for Medicare and Medicaid Services (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 Workforce Members, partners, contractors, and vendors against exclusion databases, including but not limited to the United States Department of Health and Human Services Office of the Inspector General (OIG) and United States General Services Administration (GSA) databases, to make sure that they have not been excluded from participating in federal or state healthcare programs. This screening occurs prior to hire or engagement, and continues on a monthly basis 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. 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 and Company policy. This includes, and without limitation, the federal and state anti-kickback laws.

Payments, Gifts, and Entertainment. ou may not engage in any corrupt business practice. This includes bribery, kickbacks, facilitation payments, or payoffs intended to influence or reward favorable decisions of any:

- Physician partner or their patients
- Providers or payors
- Government or quasi-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.

Workforce Members may not offer, solicit, or accept gifts of cash or cash equivalents (e.g., gift certificates) that are not part of an approved incentive program. Gifts of any amount, including meals, may not be offered to any governmental or quasi-governmental official. Such gifts can be misinterpreted as an attempt to improperly influence the official and are absolutely prohibited. Please refer to agilon's Gifting Practice Policy and seek additional guidance from Human Resources or Compliance.

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.

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.



Relationships with Healthcare 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[5]. We will not engage in activities prohibited by law. This includes, but is not limited to:

- Offering sales or appointment forms to patients
- Accepting enrollment applications
- Mailing marketing materials on behalf of a plan sponsor
- Offering improper financial incentives 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 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. Such material must be reviewed by the Legal Department prior to publication. 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.

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 must refer all media or shareholder inquiries to our Communications & Public Affairs and Investor Relations Departments. Please refer to our Regulation Fair Disclosure Policy for more information.

We understand that you may engage with social media accounts or platforms for personal use. Before posting any information referencing agilon health, other affiliated companies, or the Company's physicians and RBE entities on your personal accounts, 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, Legal and Investor Relations departments.

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

[5]This includes but is 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 CONFIDENTIALITY

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

Any disclosure of personally identifiable information or protected health 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 Compliance. Please refer to our Privacy policies for additional information.

Confidential Business Information. While working at agilon health and after your employment or engagement ends, confidential information you acquired must also be held in confidence and may not be used for personal gain by anyone. You must return to agilon or otherwise destroy any physical or electronic confidential information, and copies thereof, in your possession when your employment or engagement with agilon ends. Confidential information means any and all non-public information of any type and in any medium and includes, but is not limited to:

- Patient lists or information about our physician partners
- Workforce Member information
- Development plans, marketing strategy, financial data, budgets, or projections
- Information about pending or contemplated business deals, including contract or pricing information
- Trade secrets or proprietary ideas, whether or not protectable under patient, trademark, copyright, or other areas of law
- Technical information, including software, specifications, designs, processes, know-how, methods, techniques, formulae, inventions, or improvements

You must ensure that confidential information in your possession is kept safe and secure. You may not input any protected health information, personally identifiable information, or any other sensitive or confidential business information into any unauthorized artificial intelligence tool, and use of any such tools must comply with agilon's Artificial Intelligence Usage policy. 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 only when authorized by agilon health or as legally mandated.

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 may face disciplinary action. The supervisor 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.



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, who will work with other departments, including Legal, as needed.

Any reports received relating to our financial statements, accounting, internal controls, or auditing matters will be reviewed in conjunction with Finance. No person who is the subject of a complaint will receive such a notification.

Upon receiving any complaints relating to other matters covered by this Code of Conduct, Compliance will work with Legal and Human Resources, as applicable, to conduct an initial investigation to determine if further action is needed to resolve the complaint, and will maintain a log of all complaints received, tracking their receipt, investigation, and resolution.

All information revealed during an investigation will remain confidential unless it is 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 as may be required by 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 Compliance Department is responsible for overseeing and managing all aspects of the Compliance Program, coordinating with other departments as needed to ensure effective Program operations. Our Compliance Committee has been established to assist, advise, and guide the Compliance Department in administering the Compliance Program.The primary components of our Compliance Program include the following:

1. Written policies and procedures
2. Designation of a Chief Compliance 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

Compliance Contact Sheet.



CONTACT THE DEPARTMENT DIRECTLY:

Terri Schorr

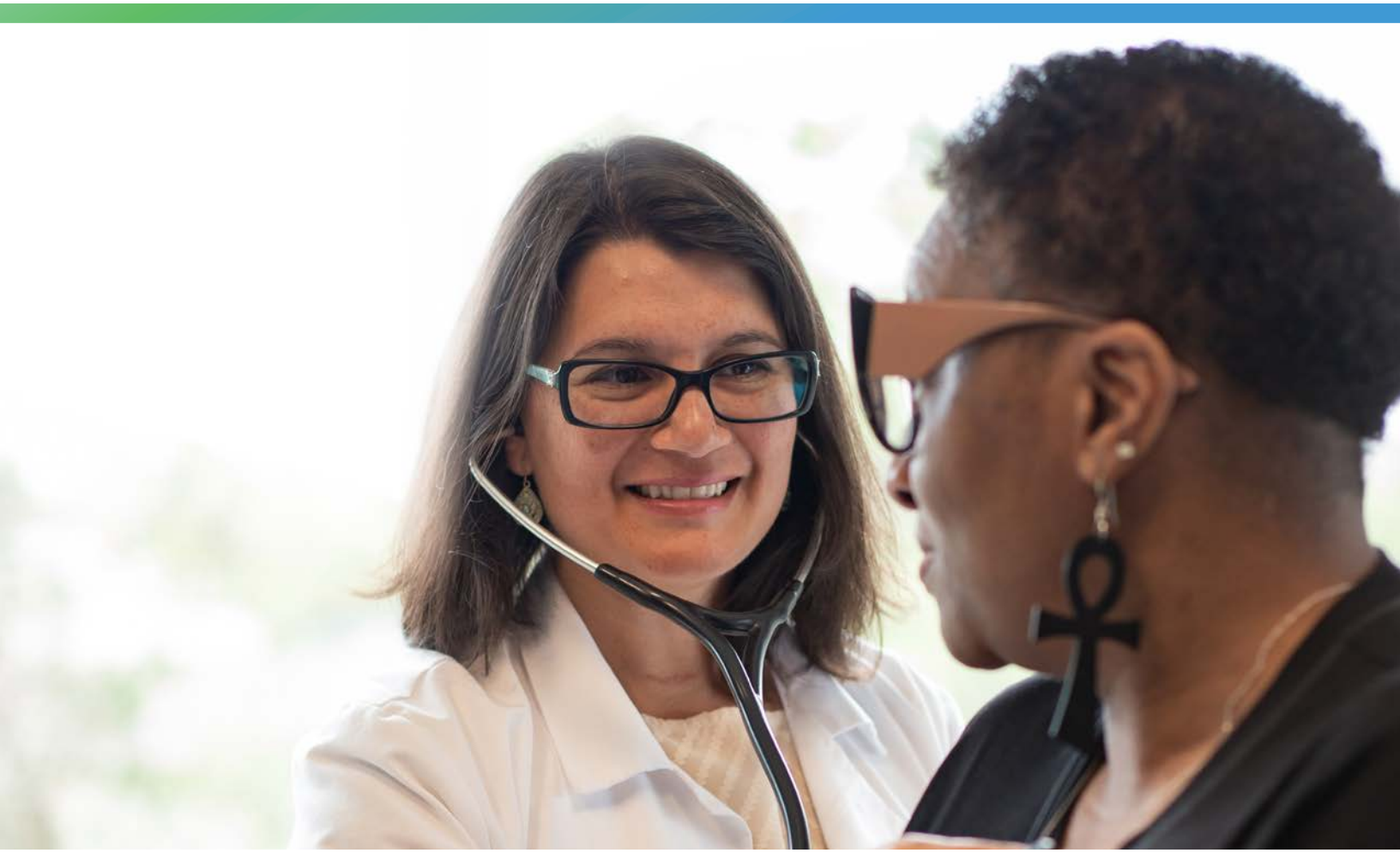
Chief Compliance Officer

Teresa.schorr@agilonhealth.com

Compliance Department Email:
ComplianceAH@agilonhealth.com

ANONYMOUS REPORTS CAN BE MADE TO:

- Anonymous reports can be made to:
  - Hotline:
    - US: (833) 591-0655
    - India: 000 800 0501 552
    - All other international callers: 800 31 26 4001
  - Online:
    https://report.syntrio.com/agilonhealth



agilon health

440 Polaris Parkway
Suite 550
Westerville, OH 43082
info@agilonhealth.com
agilonhealth.com