



Corporate Compliance Plan

Purpose

Oscar Insurance Corporation including its subsidiaries and affiliates (collectively “Oscar”) is subject to various state and federal statutes and regulations. As a health insurance company, we are committed to complying with all applicable laws including but not limited to those addressing privacy, utilization review, marketing, access to treatment, continuity of care, access to records, credentialing, Federally Facilitated Marketplace Exchange (FFM) requirements, and more.

This Plan acts to establish an overall framework for internal policies and procedures; it provides guidance for Oscar’s employees, consultants, contractors and vendors (collectively “Employees”) on dealing with compliance issues, and to enable them to comply as appropriate. This Plan is not designed to provide detailed guidance but rather to provide a roadmap to compliance.

The Importance of the Plan

Oscar is committed to providing quality coverage to our members. Our plans are filed and approved as required by state and federal law. Our compliance efforts are designed to prevent, detect and resolve conduct that does not conform to state and federal law. We want to ensure that we conduct ourselves in a moral, ethical and professional manner.

All employees (including contractors, subcontractors, vendors and other entities that interact with Oscar) are expected to comply with certain professional standards of conduct and to adhere to those requirements set forth in the Code of Conduct. If an employee is aware of any violation of the Plan, Code of Conduct, any policy, procedure or law, that employee has a duty to report the problem promptly to the Compliance Department.

The Compliance Department can be reached by:

- Hotline: 1-844-392-7589
- Email: compliance@hioscar.com
- Mail:
 - Attn: Compliance Department, Oscar, 295 Lafayette St., 6th Floor, NY, NY, 10012
- In Person: Speak to a member of the Compliance Department.

If an Employee is in doubt as to whether a specific ethical or other situation is covered by this Compliance Plan or the Code of Conduct, they should contact their supervisor or the

Compliance Department. Employees should not try to investigate the matter on their own. Employees have the right to report any violations anonymously, and Oscar maintains a toll-free Hotline that ensures anonymity. All Employees should promptly notify the Compliance Department if they believe they have engaged in or may have been requested to engage in illegal or unethical conduct. Oscar encourages self-auditing and self-reporting.

The Director of Compliance will ensure appropriate and prompt investigation of all reports of inappropriate behavior, and all potential or suspected compliance issues. In conducting an investigation, the Director of Compliance, and any designated compliance Investigator, has unfettered access to all systems and sources of information necessary to conduct a full investigation. Employees are expected to cooperate, as needed, in any investigation. All reasonable efforts will be made to protect the identity of the reporter. Once the investigation has been completed, the resolution and findings are documented, and appropriate action will be taken. Appropriate action may include, but not be limited to: discipline or termination of an employee as well as notification to a governmental agency, as needed; and/or issuance of a Corrective Action or Performance Improvement plan.

Oscar will not retaliate against any Employee for making a good faith report of inappropriate behavior or participating in any other compliance related activities. Through its Compliance Hotline, Oscar employees, members or any other person may make a report anonymously.

Purpose and Execution of the Plan

The purpose of the Compliance Plan is to guide Oscar in its management and operation of compliance-related activities. Oscar is committed to, and actually exercises due diligence in seeking to prevent and detect violations of law and legal requirements, including, but not limited to, FFM Marketplace Requirements. Oscar maintains a policy which addresses the company's compliance with the QHP Application Process for Certification to Participate in the FFM. Oscar's Regulatory Operations Team regularly monitors and reviews all updates to the QHP Application instructions, guidance and requirements put forth by CMS to ensure Oscar's compliance. The Compliance Plan has as its foundation seven elements that federal guidelines have deemed necessary for an effective, high-quality compliance program. This document, along with the Compliance Policy attached hereto as Exhibit A and Code of Conduct attached hereto as Exhibit B, provide the framework to meet the seven elements:

1. Written standards of conduct have been developed and are reinforced through written policies to promote Oscar's commitment to compliance.
2. Oscar has a Director of Compliance and Compliance Committee of the Board of Directors both of which are charged with the responsibility and oversight of the

- Compliance Program. The Director of Compliance is the designated Compliance Officer for Oscar and reports directly to Board of Directors.
3. There are regularly conducted compliance education and training programs for all employees. This includes annual HIPAA training and an annual review of the Corporate Code of Conduct.
 4. Oscar has a means by which Employees may report any violations and file any complaints. All violations and complaints may be reported to Oscar's Director of Compliance. All reported violations will be kept confidential to the extent possible. Employees may choose to report on an anonymous basis via the Compliance Hotline. All reported violations will be investigated and appropriate action will be taken.
 5. There is a system to respond to allegations of improper/illegal activities and the enforcement of appropriate disciplinary action against those who have violated internal compliance policies, applicable statutes, regulations or program requirements.
 6. Audits and/or other evaluation techniques are used to monitor and assist in the reduction of identified problem areas; this includes both internal and external monitoring to identify any risks and the overall effectiveness of the Compliance Program.
 7. Identified systematic problems are investigated and remediated and policies are in place to address the termination or discipline of individuals.

Role of Director of Compliance

Oscar has appointed a Director of Compliance as designated Compliance Officer to implement and monitor Oscar's Compliance Plan. The Director of Compliance is available and accessible to employees as needed. The duties of the Director of Compliance include but are not limited to:

- Coordinate an annual review and update the Compliance Plan as required.
- Design and coordinate regular audits and monitoring to ensure that the Compliance Plan is being adhered to by all.
- Report on a quarterly basis to the Compliance Committee, the Board of Directors, and Oscar's CEO any investigation and violations to the provisions of Oscar's Compliance Plan.
- Schedule, conduct and/or oversee annual training programs to ensure that all employees understand and adhere to the Plan.
- Be familiar with Federal and State regulation and laws as they pertain to the Compliance Plan.
- Maintain all records related to the Compliance Plan.
- Provide a process and a procedure to appropriately screen potential employees who have engaged in illegal activities and prevent the hiring of such employees.
- Performing any other activities to ensure the success of the Compliance Plan.

- Maintaining a centralized source of information for compliance related to Federal and State regulations.

The Compliance Officer will also ensure that there are effective lines of communication as necessary and appropriate. This includes ensuring that there is confidentiality as appropriate between the Compliance Officer, the Compliance Committee, employees, managers, the Board of Directors, and related entities.

Corporate Compliance Committee

The Compliance Committee reports directly into Oscar's Board of Directors. It consists of Oscar's Compliance Officer, Oscar's Senior Corporate Counsel, and Oscar's Chief Policy and Strategy Officer. The Compliance Committee meets quarterly and is governed by a charter which sets out the goals and responsibilities of the subcommittee; a copy of the charter is attached hereto as Exhibit C.

Code of Conduct

Oscar's Code of Conduct applies to all Oscar employees, contractors, members of our Boards of Directors (each a "Director"), and our delegated vendors. It addresses fraud, waste and abuse; anti-kickback violations; gift policies; conflicts of interest, and other issues. The Code of Conduct sets forth the framework under which we work and provides standards and values for our employees.

Sanctioned/Excluded Individuals and Entities

Federal law prohibits government reimbursement to individuals or entities that are excluded or ineligible to participate in federally funded healthcare programs. Violation of this law may result in substantial fines for the organization. Oscar does not knowingly arrange, contract with or bill for services rendered or arranged for by an individual or entity that is excluded or ineligible to participate in a federally funded health care program. Upon a new hire, Oscar searches the Office of Inspector General (OIG), and the General Services Administration (GSA) for excluded or ineligible persons. If an Oscar new hire is found to be ineligible for employment due to government sanctions, such new hire will be terminated immediately according to Oscar's policies. Any provider who is excluded from participation in programs offered by the Centers for Medicare & Medicaid Services (CMS) or any other government program does not meet Oscar's credentialing requirements and will be excluded from Oscar.

Compliance Risk Assessment, Review and Reporting

In conjunction with Oscar's established reporting requirements, the Compliance Officer will ensure a review of Oscar's status with current compliance and regulatory operations,

including a Compliance Risk Assessment and work plan for auditing and monitoring. The purpose of the review is to evaluate whether the compliance operations of Oscar are within substantial compliance with the policy and regulatory requirements, and identify areas of compliance risk for further auditing and/or monitoring, as well as areas that require corrective action.

The Compliance Officer, with review and comments provided by the Compliance Committee, will prepare an annual compliance report. The resulting report will be included with the documented conclusions of Oscar's internal investigation. The report will be presented to the CEO and the Board of Directors at its annual meeting. A work plan addressing plans for maintaining and improving Oscar's compliance efforts will be developed by the Compliance Officer in coordination with the Compliance Committee.

Record Retention

Records shall be maintained by Oscar for ten years. For additional information, refer to Oscar's Record Retention Policy.

Questions and Further Guidance

If you have any questions or need further guidance regarding any aspect of this Policy, please contact compliance at compliance@hioscar.com.



Policy: Compliance Policy

Approver Name, Signature, Title	Applicable Lines of Business
Jill Stein, VP of Legal and Compliance Joel Levi, Director of Compliance	<input checked="" type="checkbox"/> All <input type="checkbox"/> New York <input type="checkbox"/> Exchange <input type="checkbox"/> New Jersey <input type="checkbox"/> Off Exchange <input type="checkbox"/> California <input type="checkbox"/> Individual <input type="checkbox"/> Texas <input type="checkbox"/> Group <input type="checkbox"/> Self-Insured <input type="checkbox"/> Internal

Policy Summary

The Director of Compliance shall be responsible for developing and implementing policies, procedures and practices designed to ensure compliance with state and federal requirements. The Director of Compliance shall be responsible for monitoring the day-to-day compliance activities engaged in by Oscar.

Procedure

1. The Director of Compliance reports to the Chief Strategy and Policy Officer, has direct access to the Chief Executive Officer, and makes periodic reports, at minimum on a quarterly basis, regarding compliance matters directly to the Compliance Committee of the Board of Directors.

2. The Director of Compliance shall maintain a Corporate Code of Conduct as well as a Compliance Plan and compliance program comprised of unique components developed to address Oscar’s specific business operations. The compliance program is based on the seven elements of an effective compliance program described in the [Office of Inspector General Compliance Program Guidance for Hospitals](#) and the [Supplemental Guidance](#). Oscar also has implemented specialized programs designed to serve as checks and balances for areas of operations that may pose additional exposure for the organization. For example, Oscar works with the marketing and finance departments to ensure certain controls are in place. The seven major components of Oscar’s Ethics and Compliance program include:
 - a. High-level oversight provided by Oscar’s Director of Compliance who reports directly to the Compliance Committee of Oscar’s Board of Directors;

- b. Written standards and policies;
 - c. Training;
 - d. Auditing and monitoring;
 - e. Open lines of communication;
 - f. Response to detected deficiencies; and
 - g. Disciplinary action as warranted.
3. The Director of Compliance is regularly available to address compliance questions. The Director of Compliance regularly speaks with outside counsel and state regulators in order to provide appropriate guidance to Oscar staff.
4. Specifically, as related to the compliance program noted above, on an annual basis, the Director of Compliance (in conjunction with HR) ensures that appropriate training is performed. Employee training is provided to all employees within 60 days of joining Oscar to ensure that they are knowledgeable about pertinent regulatory requirements. Training addresses HIPAA and Oscar's code of conduct. Employees are required to sign an attestation affirming their completion of training.

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Questions and Further Guidance

If you have any questions or need further guidance regarding any aspect of this Policy, please contact the Compliance Department at compliance@hioscar.com.



Code of Conduct

Message from CEO

Team,

Since we started Oscar, we have strived to live by our vision to provide the kind of health insurance that we'd want to have ourselves. Today we're expanding into new markets and bringing smart, simple health insurance to thousands of members across the country.

Integrity is core to Oscar's foundation. We are committed to preserving the trust given to us by our members, providers, the broader health care community, employees and shareholders. We also have a commitment to comply with federal and state laws. This Code of Conduct articulates the principles that guide our actions at Oscar. Your commitment to openness and transparency, reflected in your daily actions, is what helps define Oscar as a great place to work and as a company that is reshaping the face of health care.

As a member of the Oscar family, it's your duty to report any suspected violations of our Code of Conduct, policies, procedures, law, or ethical concerns. Oscar enforces a strict no-retaliation policy for those who report in good faith. To report concerns, speak with your supervisor, the Compliance Department or the anonymous compliance hotline.

Take time to familiarize yourself with Oscar's Code of Conduct and the principles that guide our work. A Code of Conduct is only as effective as the actions we take to hold each other and ourselves accountable. The application of these principles relies on our good judgment, commitment to integrity, and a culture of openness and transparency. If you have questions or concerns, talk to your manager, the Compliance Department or the Legal Department. We're happy to help.



Mario Schlosser
CEO, Oscar

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Introduction

About Oscar

Oscar is focused on utilizing technology, data, and design to transform the face of healthcare. We're a bunch of healthcare dreamers who looked at the current state of the US healthcare system, got frustrated by the horrible consumer experience, and decided to do something revolutionary about it. We're making health insurance simple, transparent, and human.

Compliance @ Oscar

Oscar is committed to conducting business in a moral, ethical, and professional manner. This Code sets forth the framework under which we work. It provides standards and values for our employees, contractors, members of our Boards of Directors (each a "Director"), and our delegated vendors (the aforementioned persons and entities are collectively referred to as "Persons"). We strive to provide services with the utmost integrity. All Persons are expected to be fair, honest, and ethical in all dealings internally and externally – this means that we treat members, providers, regulators, and each other with respect.

Oscar is licensed and regulated by, among other government agencies, the Centers for Medicare and Medicaid Services and various state regulatory agencies. As a result, Oscar is required to comply with a variety of state and federal laws, rules, and regulations. These laws address, among other things, member privacy, utilization review, payment processes, marketing, access to treatment, continuity of care, access to records, and credentialing. Persons are expected to be familiar with the laws that govern Oscar and the services they provide to our members. It goes without saying that Oscar complies with all applicable state and federal laws.

Oscar's Code of Conduct will be enforced by the Compliance Department. Violations will be subject to disciplinary action, up to and including termination.

All new employees, contractors, and Directors, are required to complete compliance, HIPAA, and fraud and abuse training within 30 days of joining Oscar.

Various business units at Oscar may impose more stringent timeframes for the completion of training and Oscar may require additional training as well. Thereafter, employees, contractors, and Directors must participate in annual trainings such as HIPAA, workplace harassment, and Fraud, Waste and Abuse trainings. Managers are responsible for ensuring that their employees have completed the requisite training. Failure to complete training may result in disciplinary action.

Please refer to Oscar's Compliance Policy for additional guidance.

Q & A

Question:

What are some examples of violations of Oscar's policies that should be reported?

Answer:

Examples include, but are not limited to, submitting false expense reports, lying during an investigation, retaliating against a Person who reports a violation, and intentionally or unintentionally improperly sharing Protected Health Information (PHI) or the Company's proprietary information.

Duty to Report Violations and Ethics Concerns

If you suspect or become aware of a violation of this Code, any policy, procedure or law, or have an ethical concern, it is your duty to report it to the Compliance Department. Your participation in raising concerns will help us create a strong environment of compliance. Reported violations will be investigated and all reasonable efforts will be made to protect the identity of the reporter.

The Compliance Department can be reached by:

- *Phone:* 1-844-392-7589
- *Email:* compliance@hioscar.com

- *Mail:*
 - Attn: Compliance Department, Oscar
295 Lafayette St, 6th Floor, NY, NY, 10012
- *In Person:* Speak to a member of the Compliance Department

To report a concern anonymously:

- *Phone:*
 - Toll-free Compliance Hotline 1-844-392-7589
 - The Hotline is available 24/7. If you leave a message, please provide as much information as you can (names of those involved, locations, and any other details), so that we may investigate and take appropriate action. Oscar does not trace calls and will not make an attempt to identify the caller.
- *Mail:*
 - Attn: Compliance Department, Oscar
295 Lafayette St, 6th Floor, NY, NY, 10012

Investigations & Duty to Cooperate

All reported compliance and ethics concerns will be fully investigated and documented by the Compliance Department. Reports will be kept confidential to the extent possible. All Persons are required to cooperate with an investigation by providing truthful responses and preserving records associated with the investigation. Once the investigation is complete, corrective and/or disciplinary action may be taken, up to and including termination, as deemed appropriate.

Non-Retaliation and Non-Intimidation

Oscar does not tolerate any retaliation or intimidation for good faith participation in the Compliance Program. To report in good faith means that you genuinely believe an actual or potential violation of the Code of Conduct has occurred or will occur. It does not require that your report be ultimately substantiated. If you feel you are experiencing retaliation or intimidation as a result of reporting a violation or concern, contact the Compliance Department immediately. Retaliation can take many forms, including termination, suspension, demotion, a reduction in

compensation or responsibilities of an individual who raises a concern or participates in an investigation, and other forms of workplace intimidation. Persons who retaliate or threaten other persons who have reported a concern or violation will be subject to disciplinary action, up to and including termination of employment.

This protection extends to reports by Persons of suspected violations of the Code of Conduct, or any applicable law, rule or regulation and/or ethical concerns. Additionally, Oscar prohibits any retaliation or intimidation of Persons participating in Compliance Program activities, including, but not limited to:

- (1) Investigations of compliance issues;
- (2) Self-evaluations;
- (3) Audits;
- (4) Remedial actions; and
- (5) State and Federal reports.

Q & A

Question:

I think my colleague may be enrolling members fraudulently, but I'm not sure. If I'm wrong, will my manager find out and will I be in trouble?

Answer:

If you believe in good faith that your colleague is engaged in fraud, it is your duty to report your suspicions, when comfortable, to your manager or Compliance or anonymously by calling the Compliance Hotline. Oscar has a strict non-retaliation policy for Persons who report suspected violations and ethical concerns in good faith. Even if it is determined that no fraud has taken place, you're protected if you made a report in good faith.

Ethics & Integrity

Conflicts of Interest

Each employee and Board Director has a fiduciary duty to Oscar. This duty means that we must act in Oscar's best interest, and protect its assets. Oscar requires honest and ethical conduct, including the ethical handling of actual or apparent conflicts of interest between personal and professional relationships. A conflict of interest may occur if your outside activities or personal relationships influence or appear to influence your ability to make objective decisions in the course of your job responsibilities.

You must avoid participating in any decision affecting Oscar, directly or indirectly, when you might personally benefit. This may occur if a close friend or relative works for a company doing business with Oscar. If a friend will influence your decision to go with a certain vendor or "give Oscar a deal," then you should avoid entering into a relationship with that company, as it will most likely create a conflict of interest. We want to make sure that all deals are negotiated at "arm's length" and that we feel comfortable that Oscar received a fair deal, at a fair price. A conflict may also occur if you have any ownership or stock in the company that we may potentially work with. If you do, this does not mean that Oscar cannot enter into a business relationship with that organization, but it may mean that you cannot be part of the decision to enter into that relationship.

A conflict of interest exists if the demands of any outside relationships, business or charitable activities influence, hinder or distract you from the performance of your job or cause you to use Oscar's resources for something other than Oscar work purposes. It is your obligation to ensure that you remain free of conflicts of interest in the performance of your responsibilities at Oscar. New Oscar employees are required to complete an Annual Compliance Disclosure within 30 days of receipt. Directors of the Board and employees must annually complete an Annual Compliance Disclosure. If your job responsibilities, outside activities or personal relationships change in a manner that creates a potential conflict of interest, you are required to contact the Compliance Department to update your Annual Compliance Disclosure. When in doubt, disclose any potential conflict of interest to the Compliance Department.

The Compliance Department will ensure that any material interest or affiliation on the part of Oscar's officers, Directors, trustees or certain employees that is in conflict with the official duties of such person is disclosed to Oscar's Board of Directors. Please refer to Oscar's Conflict of Interest Policy for additional guidance.

Q & A

Question:

As a member of the Strategic Partnership Team, I recently met a health startup that's seeking a partnership with Oscar. I doubt Oscar would be interested, but I would like to personally get involved. May I do so?

Answer:

Business opportunities that are learned of in your official capacity must first be shared with Oscar. Contact the Compliance Department to determine whether it would be appropriate for you to engage with the startup in your personal capacity.

Q & A

Question:

My brother works for one of Oscar's providers. Due to the nature of our roles, we may be required to interact with one another in the course of business. Should this be reported to Compliance?

Answer:

Yes, also let your manager know of your relationship. Your manager and the Compliance Department will determine whether additional steps need to be taken to avoid any actual or perceived conflict of interest.

Q & A

Question:

I'm on the product team at Oscar and was recently approached by a health care startup that is interested in hiring me on a part-time basis to improve their online customer tools. I would only work on the weekends. Can I take the job?

Answer:

First speak with your manager, then reach out to the Compliance Department so that they can evaluate whether there is actual or perceived conflict of interest. External opportunities, even in unrelated fields, may result in you inadvertently sharing proprietary information. The Compliance Department will advise you on whether you can accept the position and discuss the scope of your work so that you can avoid any conflicts of interest actual or perceived. If you are given permission to pursue the opportunity, it must be done on your own time and you may not use any of Oscar's assets or resources.

Personal Relationships

Individuals with familial or romantic relationships who find themselves in a supervisory/subordinate reporting relationship are required to disclose the relationship to People Operations in a timely manner. People Operations will review each case individually and as appropriate, take additional steps that, in the Company's judgment, ensure the integrity of the Company's operations.

Handling Confidential Information

As a healthcare organization, our work includes routine access to confidential information about our members. As such, we are required to comply with state and federal laws concerning privacy, including the Health Insurance Portability and Accountability Act (HIPAA), which governs the use and disclosure of PHI. Confidential member information includes, but is not limited to names, addresses, Social Security Numbers, health status, financial information and birthdates. Improper disclosure of confidential information may be a violation of state or

federal law, potentially subjecting the disclosing person to civil or criminal liability. It is therefore essential that you protect our member and other confidential information at all times. The obligation to keep this type of information confidential remains even if you leave Oscar.

Q & A

Question:

Your neighbor is a member of Oscar and asks you to check on a claim that was submitted by her physician a few weeks ago. You're on the claims team and have access to this information. May you access the system and help your neighbor out?

Answer:

No, Oscar's policies and federal law provide strict guidance on when PHI may be accessed. PHI may only be accessed with a proper business purpose and cannot be used for personal use. Provide your neighbor with instructions to contact Member Services.

Oscar's Proprietary Information

As a healthcare organization that relies heavily on innovative technology, information about Oscar's internal workings is highly confidential and proprietary. Proprietary information includes Oscar's nonpublic and/or confidential information. Non-public proprietary information includes but is not limited to, pricing models and Care Router processes. Proprietary information must not be shared directly or indirectly, except as required within the scope of your employment. The only information that may be shared externally, outside of the scope of your employment, is information that is posted on Oscar's public website or otherwise in the public domain. Confidential and proprietary information includes, but is not limited to, personnel data, member lists, clinical information, pricing and cost data, financial data, research data, strategic plans, marketing strategies, techniques, computer software and programs (including object code and source code), database technologies, systems structures and architectures, and information pertaining to acquisitions, divestitures, affiliations and mergers. You must obtain legal and managerial approval before speaking with external

parties about proprietary information. Improper disclosure of proprietary information may subject the disclosing person to disciplinary action, up to and including termination, and civil or criminal liability. Please refer to Oscar's Employee Proprietary Information and Inventions Agreement for additional guidance.

Q & A

Question:

I spent many late nights developing network agreements on behalf of Oscar. I'm about to head west to join another health care company in a similar role. May I keep a copy of the network agreements I developed?

Answer:

No, network agreements developed while you were at Oscar are proprietary information and copies may not be taken with you when you leave.

As a health insurer, Oscar is subject to antitrust laws. It is our responsibility to avoid behavior that is or could be perceived as anti-competitive or unfair. It's not uncommon to engage in conversations with competitors at association meetings and industry conferences. However, be careful not to discuss pricing, marketing, vendors, providers, business partners and/or other proprietary information. When in doubt, contact the Legal Department.

Q & A

Question:

While attending a healthcare conference, a representative of a competitor strikes up a conversation with you about how Oscar prices its products and meets network adequacy requirements. How should you respond?

Answer:

You should not discuss pricing with a competitor as Oscar is subject to laws that prohibit us from engaging in behavior that could constitute price-fixing or anti-competitive behavior. Furthermore, questions related to our network adequacy requirements may touch on proprietary information. Be cautious and when in doubt, do not share information. If you have additional questions, reach out to the Compliance Department.

Gifts and Entertainment

There may be circumstances when it is appropriate to exchange gifts of nominal value during the ordinary course of business. Gifts are considered to be items of tangible or intangible benefits, and include but are not limited to meals, entertainment, services, or tickets. Oscar employees may accept gifts of nominal value (\$50 or less) which are offered or received once a year and are appropriate to the business setting. Keep in mind that if you receive more than one ticket, it's the combined market value that is considered. You and your immediate family members (spouse, children, parents, siblings, in-laws, and others residing within your home) may not accept any gift, favor, or service of any value – significant or not – if it influences or appears to influence a business decision by Oscar. No one should ever feel compelled to give a gift to anyone, and any gifts offered or received should be appropriate to the situation. Oscar employees and their immediate family members are prohibited from accepting or soliciting (cash or cash equivalents, such as gift certificates, honoraria, vouchers). Under no circumstances may you or a family member solicit a gift. Gifts made or received that have a market value over \$50 should never be accepted or given without approval from the Compliance Department. Please provide at least two business days for Compliance to review the matter. If approval cannot be obtained in a

timely manner, respectfully decline the offer. Perishable or consumable gifts given to a department or group should be modest. State and federal regulators should never be given gifts or bought a meal of any sort, regardless of value. Prizes won at health fairs and conferences may be accepted if all attendees were given the same opportunity to win the contest, the prize has a market value of \$50 or less, is not cash, and does not influence or compromise your business judgment. If the prize exceeds \$50 in value, please check with the Compliance Department.

Business Entertainment

As we grow, we'll continue to build our relationships with new and existing vendors and other business partners. Certain events with new and existing vendors and business partners may be considered business entertainment if an Oscar representative is in attendance and there is a clear business nexus associated with the event. Business entertainment may include but is not limited to meals, industry conferences, and charitable events. Management pre-approval is required for business entertainment expenses. For additional guidance, please refer to Oscar's Travel & Expense Policy.

Q & A

Question:

An Oscar vendor offered me two tickets to an upcoming baseball game. May I accept the tickets?

Answer:

If the combined market value of both tickets exceeds \$50, seek guidance from the Compliance Department. Before accepting, ask yourself whether there is a legitimate business purpose for the event. Gifts may never be accepted if they influence or appear to influence a business decision.

Q & A

Question:

A medical association has invited me to speak at an upcoming conference. They've offered to pay an honoraria, as well as travel and hotel expenses. May I accept?

Answer:

Under some circumstances, Oscar employees who are invited to speak at industry events may accept travel and hotel expenses when such expenses are covered for all speakers and connected to a legitimate business purpose. However, you must politely decline the speaking fee. To determine if you may accept travel and hotel expenses, please reach out to the Compliance Department so that they can review your specific case.

Kickbacks, Rebates, and Inducements

Oscar prohibits itself, its employees, contractors or anyone acting on its behalf from accepting, soliciting, offering, or giving any type of bribe, inducement, or other compensation in exchange for the referral of certain business (e.g., a kickback). A kickback is where we (or you) get or give something of value for a deal you are doing on behalf of Oscar. This prohibition extends to dealings with the government or any commercial entity. Kickbacks, rebates, and inducements include cash and anything of value, such as meals or entertainment. If you or your immediate family member stand to gain from a transaction with a vendor or a provider in our network, it is prohibited. It's unethical and in many cases it's illegal. Oscar's selection of subcontractors, suppliers, providers and vendors must be made on the basis of objective criteria, including, without limitation, quality, technical excellence, price, delivery, and service.

Q & A

Question:

A pharmaceutical company recently offered free products and data to improve our disease management programs. May we accept?

Answer:

Though these offers may be made with good intentions, they have the potential to be perceived as bribes, kickbacks or unfair sales practices. Reach out to the Compliance Department to determine whether the offer abides with Company policies and laws.

Fraud, Waste, and Abuse

Oscar is committed to monitoring all activities that could potentially lead to Fraud, Waste, and Abuse ("FWA") and does this through its Special Investigation Unit and its Compliance Department. (1) Fraud is an intentional misrepresentation of a known fact made for the purpose of obtaining a benefit or financial gain. (2) Waste includes any practice that results in an unnecessary use or consumption of financial or medical resources. Waste does not necessarily involve personal gain, but often signifies poor management decisions, practices or controls. (3) Abuse is a practice that is inconsistent with accepted business, financial or medical practices or standards, and results in unnecessary cost or in reimbursement. One of the ways we do this is by working with our vendors to identify claims that could be the result of overbilling, over or under-utilization or other inconsistent and, at times, inappropriate billing practices. It also means that we comply with the Federal False Claims Act as well as all other applicable state and federal laws addressing FWA.

All Persons have the responsibility to report any activity that we suspect is FWA. Not only is it expected by our members in order to keep healthcare affordable, it is required by our contracts with the federal and state government. For questions or concerns about FWA, you should contact the Compliance Department or the Special Investigations Unit.

Q & A

Question:

As a member of the claims team, you notice suspicious discrepancies in the claims being submitted by a particular provider. You're not sure if it's fraud, but think it warrants further attention. What steps should you take?

Answer:

Notify the Compliance Department or the Special Investigations Unit if you suspect or know of fraudulent activity. If you wish to report your concern anonymously, you may do so through the Fraud Hotline (1-844-392-7589).

How to report Fraud, Waste, and Abuse:

If you suspect fraud, report your concern to your manager or the Special Investigations Unit.

- *E-mail:* fraud@hioscar.com
- *Mail:*
 - Attn: Special Investigations Unit
Oscar, 295 Lafayette St, 6th Floor,
NY, NY, 10012.
 - Under no circumstance will there be retaliation for making a good faith report of any violation or alleged violation of fraud.

To report a concern anonymously:

- *Phone:*
 - Toll-free Fraud Hotline 1-844-392-7589
 - The Hotline is available 24/7. If you leave a message please provide as much information as you can (names of those involved, locations, and any other details), so that we may investigate and take appropriate action. Oscar does not trace calls and will not make an attempt to identify the caller.

The Special Investigations Unit will conduct an appropriate investigation. Confidentiality will be maintained to the extent possible however, anonymity is not guaranteed.

Government Inquiries

From time to time, government agencies may call or come on-site to review Oscar's policies and practices. All employees should contact the Legal Department before speaking with any government agents or providing any documents for any requests by government agents. Employees should be courteous and provide agents with complete, factual, and accurate information. During a government inquiry, you should never conceal, destroy, or alter any documents, lie, or make misleading statements to the government representative. You should not attempt to cause another person to fail to provide accurate information or obstruct, mislead, or delay the communication of information or records relating to a possible violation of law. If you suspect a violation of any of these requirements, you should immediately report the violation to a supervisor or to the Compliance Department.

Accuracy, Retention, and Disposal of Documents and Records

Every Person is responsible for the integrity and accuracy of Oscar's documents and records to comply with regulatory and legal requirements, and to ensure that records are available to defend our business practices and actions. The government relies on many Oscar documents when evaluating Oscar's compliance and determining payment rates to Oscar. Therefore, it's crucial that all documents and business records upon which those government submissions are based are accurate, reliable, and created in a timely fashion.

No one may alter or falsify information on any record or document. Business documents and records are retained and destroyed in accordance with the law and our record retention policy. For additional guidance, please refer to Oscar's Record Retention Policy. Business documents include paper documents such as letters and memos, claims, enrollment applications, computer-based information such as e-mail or computer files on disk or tape, and any other medium that contains information about the organization or its business activities.

Appropriate Use of Company Resources

Persons are required to use Company time, equipment, supplies, documents, computing, and communication in an appropriate way. Oscar employees must recognize that there is no employee expectation of privacy with respect to the Company's networks, telecommunications systems or information processing systems. Oscar maintains the right to inspect, monitor, modify, duplicate, halt, or remove any stored files, running processes, usage logs, or system activity on devices owned or managed by the Company. Oscar also maintains the right to inspect, monitor, and collect information about any traffic on Company owned or managed devices (regardless of network affiliation or ownership) and any traffic that is conducted over the Company's networks (regardless of device affiliation or ownership). Oscar will also inspect, monitor, and audit usage of the Company's internally and externally hosted services such as e-mail, regardless of how these resources are accessed.

Employees are expected to adhere to best security practices when using or interacting with Company owned or managed resources. Examples of these best practices include:

- Accessing hosted corporate resources only from authorized secure devices via a secure connection
- Only installing and running software that originates from trustworthy sources on Company owned or managed devices
- Granting and obtaining access to corporate resources and data through appropriate, documented, auditable methods
- Safeguarding access credentials to the best of employees' abilities and utilizing those only to perform necessary business tasks
- Remaining aware of destination addresses for any initiated network connection, and only establishing network connections to trustworthy hosts
- Refraining from accessing, downloading, transmitting, or interacting with illegal or improperly licensed content when using Company resource

If employees have questions or concerns regarding expectations of privacy or best security practices, they should reach out to security@hioscar.com.

Political Activities

Oscar encourages civic engagement, however your involvement in political activity must remain independent of your responsibilities at Oscar. Federal and state laws restrict the use of corporate funds and assets in connection with elections.

Therefore, you may not use company time, office supplies, and/or donated food services for the advancement of any political activity.

Communication & Social Media

Given the prevalence of social media, many Persons may be on various platforms such as but not limited to Twitter, LinkedIn, Facebook, and Instagram. If you identify yourself as an Oscar employee, contractor, or Director, please take steps to protect Oscar's brand and reputation. The Marketing Department leads Oscar's social media presence. Persons should not reach out independently to members on social media. Out of sensitivity for proprietary and confidential information, do not take pictures within the office.

Q & A

Question:

As part of the Member Service team, Joe occasionally shares unusual member stories with his colleagues in the break room and on social media. He doesn't mention the member's name. Is this allowed?

Answer:

No, persons should never share member information with their colleagues unless it's directly related to their business functions. Respecting the privacy of our members is paramount. Even if a member's name is omitted, stories should never be shared on social media or with unauthorized parties.

If you are approached about the Company's views on a particular topic, reach out to the Legal Department to determine if it's appropriate for you to respond.

Q & A

Question:

I was recently invited to speak at a conference. May I accept the invitation?

Answer:

If invited to speak on behalf of Oscar, reach out to the head of your department to determine whether it's appropriate for you to accept the invitation.

Marketing Practices

Insurance providers must adhere to strict marketing guidelines. Oscar expects all Persons to comply with any marketing rules. Oscar does not use deceptive marketing practices. We are honest, truthful, and forthcoming in all of our marketing materials. Oscar does not conduct door-to-door sales nor does it engage in cherry-picking, meaning that health status is never a factor in marketing to potential members or enrolling them. Oscar welcomes all eligible individuals to enroll in its plans.

Work Environment

Diversity and Equal Employment

Oscar is committed to providing an equal-opportunity work environment where everyone is treated with fairness, dignity, and respect. We comply with all federal and state laws, regulations, and policies relating to nondiscrimination in all of our personnel actions. These actions include hiring, staff reductions, transfers, terminations, evaluations, recruiting, compensation, corrective action, discipline, and promotions.

We will make reasonable accommodations to the known physical and mental limitations of otherwise qualified individuals with disabilities. Please refer to Oscar's ADA, Civil Rights, and Workplace Harassment Policy for additional guidance.

Q & A

Question:

Your manager occasionally makes off-color jokes during staff meetings. His jokes are often met with laughter from others in the room, however you feel uncomfortable. You're not comfortable raising the issue directly with your manager. What can you do?

Answer:

Contact People Operations and share your experience. Oscar takes all reports seriously and will address the situation appropriately.

Harassment and Workplace Violence

Every employee has the right to work in an environment free of harassment. Oscar does not tolerate harassment in any form, including physical actions and verbal remarks, made by or towards Persons or those outside of Oscar.

Any form of sexual harassment is strictly prohibited. This prohibition includes unwelcome sexual advances or requests for sexual favors. Moreover, verbal or physical conduct of a sexual nature that interferes with an individual's work performance or creates an intimidating, hostile, or offensive work environment will not be tolerated at Oscar.

Harassment also includes incidents of workplace violence. While stresses may come into play, it is never appropriate to treat someone rudely or make him or her feel uncomfortable. For additional guidance, please refer to Oscar's ADA, Civil Rights, and Workplace Harassment Policy.

Consequences for Violating Harassment Policy

If a workplace harassment violation is substantiated and People Operations determines that there was inappropriate conduct by an employee, the Compliance Department will work with the individual's manager to determine appropriate next steps. The steps may vary based upon the frequency and severity of the conduct. Next steps may include, but are not limited to, a verbal warning, a written warning, additional training, and/or a probationary period during which the individual is monitored or termination.

How to Report Harassment

If an individual witnesses or believes they have experienced discrimination or harassment, or feels threatened in any way by one of their colleagues, they should report it to their manager or directly to People Operations. A report may be made anonymously through the Compliance Hotline at 1-844-392-7589. There will be no retaliation for making a good faith report of any violation or alleged violation.

People Operations will conduct an appropriate investigation. Confidentiality will be maintained to the extent possible however, anonymity is not guaranteed.

Drug & Alcohol Policy

Oscar is committed to maintaining a safe work environment for all Persons. Oscar prohibits the use, possession, sale, and distribution of illegal drugs or drug paraphernalia on Oscar premises or at Company sponsored events. If you are

charged with a drug-related offense and found guilty, plead guilty, or no contest, you are required to report such information to People Operations within 5 days of the event. Oscar prohibits the misuse of alcohol during working hours and at Company sponsored events. While alcoholic beverages may be available on company premises and/or at Company events, Persons are expected to adhere to the Code at all times and drink responsibly. Oscar maintains a smoke-free and gun-free work environment.

Physical Property and Visitor Sign-In

While it is Oscar's responsibility to maintain the space and our equipment, all Persons are responsible to keep the space and equipment in the best condition possible. To the extent that laptops are taken off-site, they must be protected. If a laptop, phone or other equipment is lost or stolen, you must immediately report it to your supervisor or the Head of Information Technology.

It is also our goal to make our environment as secure as possible. To that end, for both safety and regulatory reasons, every visitor, including vendors and consultants (unless otherwise registered in our system), must sign in even if we recognize the visitor or the person visits frequently. Please make sure doors securely close behind you when navigating through the office.

Conclusion

The above principles guide Oscar and its employees, contractors, Directors, and vendors. They enable us to live up to our mission statement and provide health insurance in a thoughtful, ethical, friendly and unique way.

All Persons must adhere to this Code.

Acknowledgement

I have read Oscar's Code of Conduct and understand its purpose.

I understand and acknowledge that I have a responsibility to comply with Oscar's Code of Conduct, policies and procedures, and adhere to all state and federal laws.

Signature: _____

Printed Name and Department: _____

Date: _____

*Please complete, scan, and send this final page to compliance@hioscar.com and copy your manager.

Oscar Insurance Corporation New Jersey Compliance Committee Charter

Title: New Jersey Compliance Committee Charter

Purpose:

It is necessary to establish a Compliance Committee (“Committee”) to advise and support the Head of Compliance with implementing and maintaining an effective compliance program (the “Program”). Oscar is responsible for implementing an effective Program that meets all legal, regulatory and subregulatory requirements.

Core Membership:

The Head of Compliance shall appoint the members of the Committee and serve as the Chair of Committee. The Committee shall receive direction from, and report directly to, the Head of Compliance when working on compliance related issues.

The Committee shall include at least 5 representatives from across the organization including the Head of Compliance who shall be appointed Chairperson of the Committee.

Other employees from various operational departments will be invited to attend as determined by the Head of Compliance.

Responsibilities/Methodologies:

The Committee will be responsible for the following duties:

1. Reviews and approves the Committee Charter annually.
2. Reviews and approves the Program and the Code of Conduct, as well as supporting policies and procedures, at least annually, or more frequently depending upon any changes in laws, regulations or sub-regulatory guidance, or other reasons.
3. Proposes policies and procedures to promote compliance with applicable federal and state legal and regulatory requirements and to address risk areas, as needed, and determines the appropriate department(s) for development.
4. Receive reports on documentation and reports submitted to any federal or state government agencies related to compliance concerns or voluntary disclosures.
5. Develops strategies to promote compliance and the detection of any potential violations.
6. Assists the Head of Compliance with the development and review of strategies to promote compliance and the detection of any potential instances of non-compliance, fraud, waste, and abuse or criminal activity.
7. Provides feedback on the Compliance Department’s annual monitoring and auditing work plan.
8. Monitors the effectiveness of corrective and preventive action plans.
9. Monitors the system for all personnel, including directors, officers, employees, Oscar delegated vendors and contractors, to ask compliance questions, and report potential instances of fraud, waste or abuse and non-compliance.
10. Develops and revises as required, at least annually, metrics and benchmarks to determine the effectiveness of Oscar’s compliance program.
11. Receives reports on disciplinary action taken against employees for fraud, waste and abuse and non-compliant violations to ensure consistency of the actions taken.
12. Assists the Head of Compliance in the evaluation of adequacy of resources for the Compliance Department.

Meeting Frequency and Contents:

The Committee shall meet quarterly at regularly scheduled intervals, or more frequently as the Committee determines appropriate.

In advance of each meeting, the Head of Compliance shall prepare an agenda. Prior to the meeting, the Head of Compliance shall solicit agenda items from Committee members and/or assign topics to be presented by certain members. A secretary designated by the Head of Compliance will take and maintain minutes of all meetings of the Committee. All such minutes will be distributed to the Committee members for review and approval. Regular meeting minutes for each Committee session will be kept, maintained and reported to senior management, upon request and without modification. The Head of Compliance will reserve the right to designate a chair in order to ensure sessions can be carried out in absence of the Head of Compliance, when necessary.

Quorum

A quorum will be defined as at least three (3) Committee members, excluding the Head of Compliance. The Committee will have power to take action and vote so long as a quorum is present.

Independence:

In order to maintain independence of the Committee, the Head of Compliance reports on the Committee to the respective Board(s) of Directors or designated committee(s) thereof.

**Oscar Insurance Corporation
Texas Compliance Committee Charter**

Title: Texas Compliance Committee Charter

Purpose:

It is necessary to establish a Compliance Committee (“Committee”) to advise and support the Head of Compliance with implementing and maintaining an effective compliance program (the “Program”). Oscar is responsible for implementing an effective Program that meets all legal, regulatory and subregulatory requirements.

Core Membership:

The Head of Compliance shall appoint the members of the Committee and serve as the Chair of Committee. The Committee shall receive direction from, and report directly to, the Head of Compliance when working on compliance related issues.

The Committee shall include at least 5 representatives from across the organization including the Head of Compliance who shall be appointed Chairperson of the Committee.

Other employees from various operational departments will be invited to attend as determined by the Head of Compliance.

Responsibilities/Methodologies:

The Committee will be responsible for the following duties:

1. Reviews and approves the Committee Charter annually.
2. Reviews and approves the Program and the Code of Conduct, as well as supporting policies and procedures, at least annually, or more frequently depending upon any changes in laws, regulations or sub-regulatory guidance, or other reasons.
3. Proposes policies and procedures to promote compliance with applicable federal and state legal and regulatory requirements and to address risk areas, as needed, and determines the appropriate department(s) for development.
4. Receive reports on documentation and reports submitted to any federal or state government agencies related to compliance concerns or voluntary disclosures.
5. Develops strategies to promote compliance and the detection of any potential violations.
6. Assists the Head of Compliance with the development and review of strategies to promote compliance and the detection of any potential instances of non-compliance, fraud, waste, and abuse or criminal activity.
7. Provides feedback on the Compliance Department’s annual monitoring and auditing work plan.
8. Monitors the effectiveness of corrective and preventive action plans.
9. Monitors the system for all personnel, including directors, officers, employees, Oscar delegated vendors and contractors, to ask compliance questions, and report potential instances of fraud, waste or abuse and non-compliance.
10. Develops and revises as required, at least annually, metrics and benchmarks to determine the effectiveness of Oscar’s compliance program.
11. Receives reports on disciplinary action taken against employees for fraud, waste and abuse and non-compliant violations to ensure consistency of the actions taken.
12. Assists the Head of Compliance in the evaluation of adequacy of resources for the Compliance Department.

Meeting Frequency and Contents:

The Committee shall meet quarterly at regularly scheduled intervals, or more frequently as the Committee

determines appropriate.

In advance of each meeting, the Head of Compliance shall prepare an agenda. Prior to the meeting, the Head of Compliance shall solicit agenda items from Committee members and/or assign topics to be presented by certain members. A secretary designated by the Head of Compliance will take and maintain minutes of all meetings of the Committee. All such minutes will be distributed to the Committee members for review and approval. Regular meeting minutes for each Committee session will be kept, maintained and reported to senior management, upon request and without modification. The Head of Compliance will reserve the right to designate a chair in order to ensure sessions can be carried out in absence of the Head of Compliance, when necessary.

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