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A message from our CEO

At Bright Health Group, integrity is at the core of everything we do. We are committed to doing the right thing in every aspect of our business. Doing the right thing means complying with all legal regulations and making the workplace safe for everyone. Everyone at Bright Health Group is responsible for creating a safe and healthy environment and meeting all legal regulations.

Our Board of Directors and senior leaders set the tone for the entire organization. We look to them as an example for the rest of the organization of what doing the right thing looks like. As CEO, my personal commitment to our ethics and compliance is absolute. It's one of the main principles that guides me as I lead this organization.

Our Code of Conduct is a foundational document to understand our organization's ethics, compliance requirements, and other guidelines. I encourage everyone in the organization to read, understand, and absorb this Code. Beyond just following our Code, I believe we all have the courage to speak up when you see violations.

Thank you for joining me in this commitment to integrity and the Bright Health Group mission and values.

G. Mike Mikan



Bright Health Group - living our values

We are all personally responsible for upholding Bright Health Group values, fostering respect and trust in our workplace and between our colleagues, and protecting the company's integrity and reputation. Integrity is built and maintained one action at a time. We all can make a difference.

OUR MISSION

Making healthcare right. Together.

OUR VISION

Through powerful relationships with Care Partners, we help all people live healthy and brighter lives.

OUR VALUES

By living out our values each day, we can accomplish our mission and realize our vision.

Be Brave

Challenge the status quo with curiosity, courage, and tenacity.

Be Brilliant

Deliver predictable excellence with a learning mindset.

Be Accountable

Live by your word, always.

Be Inclusive

Value all voices and contributions to achieve big things.

Be Collaborative

Fearlessly partner with all people.



Why we have a code

A Code of Conduct clarifies an organization's mission, vision, and values. It lays out standards for conduct in the workplace, so we know how to work towards a healthy environment that demonstrates our values.

Bright Health Group's Code teaches us how to live our values and ultimately, achieve our vision and mission.

A Code is also a valuable reference guide. It can help you locate relevant documents, understand services available to employees, and acquaint you with resources related to ethics within the organization.

Our Code applies to everyone - the board, employees, contractors, vendors, and every entity within Bright Health Group. Our Code keeps everyone accountable; no one gets special treatment.

Our Code requires you to follow applicable laws and regulations at all times. If you ever experience a conflict between our Code and a more restrictive law or regulation, the law or regulation overrides our Code.



Speaking up and taking action

Bright Health Group strongly encourages you to speak up and report misconduct or any suspected violation of an ethical, legal, or compliance standard.

Making the decision to speak up and formally report an issue can be challenging. How do you know when to say something? Who do you talk to? What will happen after you report an issue?

KNOW WHEN SOMETHING IS A MISCONDUCT OR VIOLATION OF AN ETHICAL, LEGAL, OR COMPLIANCE STANDARD

Learn to identify unethical behavior or a violation of legal, compliance, and privacy standards that apply to every aspect of our business. Ask questions when you're in doubt about what to do or how this Code applies to your work. You can ask for help from your manager or a member of our legal or compliance teams. You can also submit questions through the Lighthouse reporting process described below.

You are required to report certain things

You must report known ethical, legal, or compliance violations, which will be investigated by our compliance department. You must also report any concerns about any aspect of our financial disclosures and any accounting, auditing, or internal control issues.

THE REPORTING PROCESS

Bright Health Group works with Lighthouse, a third-party group organization, to begin the reporting process. After a report intake, Bright Health Group continues the investigation.

1. Employee creates a report through Lighthouse
2. Lighthouse processes the request
3. Bright Health Group leads the investigation
4. The report and investigation are completed internally

You have the option to report a known or suspected violation anonymously.



HOW TO SUBMIT A REPORT



Lighthouse-Services.com/brighthealthgroup



Call toll-free (USA and Canada):

- English: 855-208-3766
- Spanish: 800-216-1288



Reports@Lighthouse-Services.com



Fax: 215-689-3885

- You must include the company name with an emailed or faxed report.

NON-RETALIATION

Retaliation is when an employee is punished for engaging in an activity that is legally protected, including reporting suspected unethical action or legal noncompliance.

Retaliation is illegal and Bright Health Group has a strong anti-retaliation policy to support employees in taking action.

Our non-retaliation policy means that reporting an issue will not hurt you, your job, or your reputation. You can feel safe when you report an issue, knowing you're doing the right thing and you won't be punished for it.

VIOLATIONS

Violations of applicable laws and regulations, our policies, or this Code may result in disciplinary action, up to and including termination, and legal consequences. We will promptly, thoroughly, and impartially review any suspected violation. You have a responsibility to cooperate fully in all ethics and compliance investigations. A member of management or the board will make the final decision on appropriate action.

THE TAKEAWAY

- Knowledge is power - learn what things are violations
- If your instincts are telling you something isn't right, say something
- You can report anonymously
- Reporting won't hurt you because of our non-retaliation policy

Modifications and waivers

Bright Health Group may modify this code. Bright Health Group's board of directors must approve any amendment, modification, or waiver of any provision of this Code for directors or executive officers. Any amendment, modification, or waiver will be promptly disclosed in accordance with applicable laws, rules, and regulations (including stock exchange rules).



Creating a healthy and respectful work environment

Why does creating a healthy work environment matter? Creativity, productivity, and collaboration flourish in a healthy workplace. Without a culture of respect, employee productivity, job satisfaction, attitudes, and cooperation are harmed.

A healthy workplace means everyone feels listened to and seen. Everyone is included and welcomed.

Conflict is natural and unavoidable because we're all different. We can ensure the conflict is productive and leads to better understanding, acceptance, and new ideas.

ANTI-DISCRIMINATION AND ANTI-HARRASSMENT

You must never discriminate or treat employees or job applicants unfairly in matters that involve recruiting, hiring, training, promoting, compensation, or any other term or condition of employment.

You are expected to make employment decisions regarding employees and applicants based on job-related factors, without regard to race, color, gender, age, national origin, religion, creed, sexual orientation, gender identity, marital status, citizenship, disability, veteran status, or any other legally protected basis. Basing employment decisions on any of these personal characteristics is against our policies and is illegal.

We prohibit harassment of any kind in the workplace or any other offensive or disrespectful conduct. You must never engage in workplace harassment, which includes unwelcome verbal, visual, physical or other conduct of any kind that causes others to feel uncomfortable or creates an intimidating, offensive, or hostile work environment. While the legal definition of harassment may vary by jurisdiction, we consider the following non-exhaustive list to be unacceptable behavior:



- Sexual harassment
- Offensive language, jokes, or degrading comments
- Racial, ethnic, gender, or religious slurs
- Intimidating or threatening behavior

Remember that harassment, sexual or otherwise, is determined by your actions and how they impact others, regardless of your intentions. If you or someone else is the subject of discrimination or harassment, speak up and report it.

ADDRESSING DISCRIMINATION AND HARASSMENT

Use the three A's - awareness, attitude, and action - to help address, prevent, and resolve discrimination and harassment in the workplace.

Awareness

Pay attention to your surroundings and learn about the experiences of others.

Attitude

Take personal responsibility for creating a healthy and positive workplace.

Action

Bright Health Group wants to equip you with the right skills, so you feel confident to take action.

TAKING DIRECT ACTION

You can speak up and make a difference by addressing negative remarks, sharing your opinion, disagreeing with a discriminatory statement, or pointing out harmful language and behavior.

DIVERSITY IN THE WORKPLACE

We're an equal opportunity employer

Bright Health Group is committed to providing equal opportunity in employment to all employees and job applicants. We do not discriminate against any individual for employment because of race, color, religion, sex, gender (including gender identity), age, national origin, marital status, sexual orientation, veteran status, disability, genetic information, or any other status or condition protected by applicable federal, state, or local laws, except where a bona fide occupational qualification applies.



DEI Advisory Council

Bright Health Group created the Diversity, Equity, and Inclusivity (DEI) Advisory Council to maintain a culture that values diversity, equity, and inclusion, and embeds these values deeply in our organization.

Diversity

Having a diverse workforce isn't enough; we also need to respect our differences and be open to different perspectives.

Equity

Everyone is treated fairly, regardless of their personal characteristics.

Inclusivity

Everyone is given the tools or resources they need to equally participate in all aspects of their job and workplace activities, especially those who are often excluded or marginalized.

“Bright Health Group unequivocally condemns racism, discrimination, and all behaviors that undermine the humanity of people of color. We expect every human being to be treated equally and with dignity.

Today it's more important than ever that we come together to work toward a more just and inclusive society.”

- Mike Mikan, Vice Chairman, CEO, and President



Confidential and proprietary information

Protecting confidential and proprietary information is a crucial part of ensuring the overall safety and integrity of Bright Health Group. Confidential and proprietary information includes any information not shared with individuals outside of the company, and any information useful to our competitors.

Confidential and proprietary information is information that is critical to the operation of an organization and includes things that are owned, patented, trademarked, copyrighted, etc. by Bright Health Group.

Examples:

- Research and development data for upcoming projects
- Trade secrets
- Marketing and financial plans
- Intellectual property
- Organization emails
- Employee agreements

You are required to safeguard this information from inappropriate disclosure while you are employed by Bright Health Group and even after you leave Bright Health Group. Confidential information of Bright Health Group remains Bright Health Group's property at all times. You may not take customer or member lists, formulas, processes, contracts, trade secrets, intellectual property, sales-related information, or any other company confidential or proprietary information with you if your employment with Bright Health Group ends.

CONFIDENTIAL INFORMATION - MEMBERS

State and federal law regulates the use of our members' and beneficiaries' health, financial, and other private information. Never use or disclose member or patient confidential information, unless allowed by company policy and in support of a valid business purpose.



CONFIDENTIAL INFORMATION - PROVIDERS, VENDORS, AND THIRD PARTIES

Never share confidential information about our providers, vendors, and other business partners unless it is authorized by policy, for a valid business purpose, and required by your assigned job duties. Bright Health Group prohibits the use or disclosure of the confidential or proprietary information of a prior employer, or other third party, in connection with your work for Bright Health Group.

HIPAA AND PHI

The Health Insurance Portability and Accountability Act (HIPAA) is a federal law that establishes the rules for managing protected health information (PHI) throughout the United States. Some states may have additional rules regarding medical information confidentiality. HIPAA ensures proper access to and confidentiality of medical records.

PHI is information or records, in any form or media, including electronic, paper, or oral, about an individual's mental or physical health, condition, or treatment, whether past, present, or future.

MINIMUM NECESSARY RULE

HIPAA limits the amount of information that may be shared, even when the individual has consented having their PHI shared. Disclosure is restricted to the minimum necessary that is needed to accomplish a task. Access to PHI should only happen on a "need to know" basis.

Do not access, acquire, examine, talk about, or share PHI unless it's required for your job. If you're authorized to disclosed PHI, follow the minimum necessary rule. Use de-identified PHI whenever possible. If PHI is needed, use a limited data set whenever possible.

PROTECTING PHI

Ensuring that PHI remains protected and confidential is not just good business, it's legally required. Companies and individuals who violate HIPAA laws regarding PHI can face major legal consequences, including loss of accreditation, fines, and jail time.

Best practices to protect PHI:

- Use the minimum necessary rule or limited data sets whenever possible



- Keep laptops, files, disks, offices, and filing cabinets that contain PHI locked
- Don't leave materials containing PHI in an unsecured location, such as a vehicle
- Make sure PHI is no longer accessible when it's discarded, such as by shredding it

E-PHI

The HIPAA Security Rule covers the physical movement of removable/transportable electronic storage media, such as carrying around a laptop (E-PHI). As the world becomes increasingly digital and faces higher cybersecurity threats, protecting E-PHI should be a top priority.

Best practices to protect E-PHI:

- Verify email addresses and numbers before sending E-PHI or documents
- Use secure encrypted systems to send E-PHI whenever possible
- Don't download unencrypted E-PHI outside the system to public or remote computers or copy it to media devices
- Don't leave devices or media containing E-PHI in a vehicle
- Make sure E-PHI is no longer accessible when it's discarded, such as by securely erasing it from a device or destroying data storage devices

Know what information is sensitive, be aware of potential opportunities for data security compromises, and take all precautions to protect information.

INSIDER TRADING POLICY

Insider trading is the illegal practice of trading on the stock exchange to your own advantage through having access to "material non-public information."

Material non-public information is generally considered to be information a reasonable investor would consider important when deciding to buy, sell, or hold a security and that information is not available to the general public.

As part of your job, you may learn Bright Health Group material non-public information. You should not participate in transactions of Bright Health Group securities (including but not limited to its common stock) or the securities of another company involved with Bright Health Group, or advise anyone else to do so, while you have material non-public information about Bright Health Group or that company.



This includes any transaction in Bright Health Group's securities, such as purchasing or selling Bright Health Group securities and exercising options. Our rule against insider trading applies to your family members, anyone else living in your household, and any individuals/entities over whose transactions in Bright Health Group securities you have influence or control.

Anyone who participates in insider trading or shares material non-public information is subject to severe punishment, including significant fines and up to imprisonment.

Additionally, you are not permitted to:

- Engage in any transactions, including prepaid variable forward contracts, equity swaps, collars, and exchange funds, that are designed to hedge or offset any decrease in the market value of Bright Health Group's equity securities
- Purchase Bright Health Group's securities on margin, borrow against any account in which the securities are held, or pledge securities as collateral for a loan without first obtaining pre-clearance from the General Counsel.

For more information, see our Insider Trading Policy, which is available on the company intranet.

USE OF COMPANY ASSETS

Use our company assets only to conduct business or for other professional reasons approved by your manager.

Company assets include:

- Electronic assets and communication tools: Telephone numbers, emails, and instant messages
- Funds: Cash, checks, and company credit cards
- Equipment: Office supplies, computer hardware and software, fax machines and copiers
- Information: Documents, data, and records

Don't use company assets for:

- Illegal activities
- Personal gain, including soliciting personal business or publicly advancing your individual views
- Sales of any products or services other than Bright Health Group's
- Harassment



- Creating, viewing, receiving, sending, or downloading chain emails (including jokes)
- Sexually explicit material
- Inflammatory or derogatory communication

PERSONAL USE

You may use electronic company assets for personal use in limited situations or as approved by your manager. Limited personal use means it doesn't affect your productivity, result in material cost to Bright Health Group, and follows all our policies about company confidentiality.

Take a look - Personal use in real life

- Watching Netflix during regular business hours.
- Sending an email from your personal Gmail account during your lunch break.

COMPANY REVIEW

You should not have an expectation of privacy regarding the use of Bright Health Group's information resources. Any information you create, share, or download onto the company systems or equipment belongs to the company. Bright Health Group has the right to review, record, audit, investigate, intercept, access, delete, and disclose any information you create, share, or download onto the Company's systems or equipment, including your work computer. The contents of electronic storage may be disclosed within the company to those who need to know and outside the company, including law enforcement or government agencies, without your knowledge or permission.

All your Bright Health Group electronic communication systems and work property, including your laptop, are not private. The company can review and disclose any information whenever is deemed necessary by the company's sole discretion.



RECORD KEEPING AND FINANCIAL INTEGRITY

Bright Health Group has a duty to provide accurate, timely, and complete financial disclosures as required by the laws and regulations that govern our company. You have a duty to act with honesty when recording and reporting financial information about company operations. If you provide, review, or certify financial information in connection with any internal control or procedure, such as timesheets, expense reports, revenue vouchers, or other financial statements, you must provide accurate, timely, and complete information. Making or approving false or misleading records or documentation, or failing to properly disclose any asset or liability is strictly prohibited.

RECORD RETENTION AND DISCLOSURE

Employees must comply with recordkeeping and retention requirements for corporate documents. Destroying or disposing of company records is not something you may do based on your individual discretion. Bright Health Group's record retention policy governs the appropriate disposal of records once the applicable record retention period has expired. Destruction or alteration of records to avoid disclosure in a legal or government investigation may be a criminal offense.

DISCLOSURES, INVESTIGATIONS, AND AUDITS

We cooperate with properly conducted audits or investigations in a truthful and ethical manner. Refusal to cooperate with properly conducted audits or investigations might harm our reputation as a responsible and ethical company. If it is part of your responsibility to respond to a request for information for disclosure publicly or to a government agency, you must make full, fair, accurate, timely, and understandable disclosures. In addition, if it is part of your responsibility to provide information for such communications, disclosures, or reports, you must ensure that the information you provide is accurate and complete. You also must make open and full disclosure to and cooperate fully with auditors and/or investigators in connection with any corporate or external audit or review.

Despite anything to the contrary in this Code, you may communicate, cooperate, or file a complaint with any government or law enforcement entity about possible violations of any legal or regulatory requirement. You may make disclosures to any governmental entity that is protected under the whistleblower provisions of any applicable law or regulation, so long as these conditions are met:



- The communications and disclosures are consistent with applicable law
- The information disclosed was not obtained through a communication that was subject to the attorney-client privilege (unless disclosure of that information would otherwise be permitted by an attorney consistent with the applicable federal law, attorney conduct rules, or otherwise)

Any agreement inconsistent with the above language between Bright Health Group and any employee is deemed invalid and will not be enforced by the company.



Conducting business

CONFLICTS OF INTEREST

What is a conflict of interest?

A conflict of interest is when your interests or actions – actual or perceived – compromise or influence your ability to act in Bright Health Group’s best interests.

Conflicts of interest may result from:

- Receiving profits, gain, or other benefits as a result of your position that’s not part of your normal compensation
- An activity is detrimental to Bright Health Group
- An activity that results in improper or illegal personal gain
- Having or seeking a business, contractual, or other financial relationship with a Bright Health Group vendor or consultant
- Having a family interest in the outcome of a decision involving an employee’s spouse, parent, or dependent child
- Having served as an officer, director, or consultant for another organization within the last year

As an as an employee or director of Bright Health Group, you are legally obligated not to participate in conflicts of interest, unless approved by Bright Health Group.

What if I think I have conflict of interest?

You are obligated to disclose any actual or perceived conflicts of interest to Bright Health Group. Email the Chief Compliance Officer at Compliance@BrightHealthPlan.com or any member of the legal team to get started.

For more information on our conflict of interest policies, log in to your Workday account and go to **Employee Resources > Policies & Processes > Conflicts of Interest Policy**.

CORPORATE OPPORTUNITIES

You have a responsibility to Bright Health Group to advance its legitimate interests with the opportunity arises. Any opportunity that you discover through your posi-



Take a look: conflicts of interest in real life

Barry works in the hiring department. His niece, Ally, is a recent college graduate and is looking for a job. She asks Barry to recommend her for an open position on the company's marketing team. However, Ally didn't study marketing at school and has never held a related position before.

THE PROBLEM: Barry could use his influence to help a family member - someone who he has a close and personal relationship with - to get her hired for a role she's not qualified for.

THE SOLUTION: Barry tells Ally he can't help her get this role at his company. Instead, he offers to help her job hunt in his free time for a position she's qualified for.



tion with the company or using Bright Health Group's property or information belongs to Bright Health Group. You should not take such opportunity for yourself or offer it to any other person unless Bright Health Group has waived the right to such opportunity (in the case of directors, subject to Bright Health Group's certificate of incorporation and bylaws). You should not compete with Bright Health Group while serving as one of its employees or directors, or attempt to use corporate property or information for personal gain.

GIFTS, ENTERTAINMENT, AND CHARITIES

Avoid soliciting gifts, items of value, entertainment, favors, or services from present or potential vendors or contractors.

Do not accept gifts, items of value, entertainment, favors, and services that appear to be offered with the intent to influence your performance, duties, or any decisions made on behalf of Bright Health Group.

Do not accept gifts, items of value, entertainment, favors, or services that other coworkers would consider excessive or lavish for personal use from any present or potential vendor, contractor, or entity doing business with Bright Health Group.

Exceptions include:

- Promotional items of nominal value, such as mugs, water bottles, and tote bags
- Occasional, reasonably priced meals
- Gifts based on outside business or employment relationships (such as a birthday gift from a friend)
- Invitations to large events where people with common interests may attend
- Gifts of limited value extended as a business courtesy

In the case of Medicare and Medicaid beneficiaries such will not exceed the values set forth in regulations.

You may not use Bright Health Group funds for improper or illegal activities. You will not make payments to government officials to secure sales or obtain a favorable treatment. Gifts to or entertainment of government officials or employees are prohibited because these actions could be construed as attempts to influence government decisions.



FAIR DEALING

You should deal fairly with all of Bright Health Group's customers, vendors, suppliers, consultants, competitors, and employees at all times. You should behave ethically and respectfully at all times and not take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any other unfair dealing practice.

SECURITY TRADING POLICY

Interaction with government officials

Bright Health Group may engage with officials in state and federal government to advocate our position on public policy through a variety of activities and communications.

State and federal governments have strictly enforced laws regarding contracting government offices. These laws may include restrictions on lobbying or other contacts with government officials.

Business needs

For any business need that requires meeting with a government official, email **Compliance@BrightHealthPlan.com** for guidance.

Gifts

Federal law prohibits giving gifts to executive and legislative branch officials. State and local laws may include additional restrictions. Always get approval from **Compliance@BrightHealthPlan.com** before giving a gift to a state or local government official.

If an employee contacts any government official outside of their official capacity with Bright Health Group, they must let it be known the views expressed are theirs alone and not of Bright Health Group.

Kickbacks

A kickback is an improper incentive offered by an organization or company to encourage providers to use or prescribe their goods. Incentives can be financial or in the form of gifts and other benefits.



The Anti-Kickback Statute makes it a federal crime to solicit, receive, offer, or pay any kickback, bribe, or rebate, directly or indirectly, in cash or in kind for referring a person to a provider for services covered by Medicare, and for purchasing, leasing, or ordering goods or services covered by Medicare.

False Claims

The False Claims Act (FCA) prohibits knowingly presenting, or causing to be presented, to the federal government a false or fraudulent claim for payment or approval. It also prohibits knowingly or using, or causing to be used, a false record or statement to get a false or fraudulent claim paid or approved by the federal government or its agents. The FA protects individuals from retaliation for reporting suspected violations.

ANTI-DISCRIMINATION IN MARKETING AND ENROLLMENT

Bright Health Group does not engage in discriminatory marketing, enrollment, disenrollment, medical management, benefit design, provider contracting, or other policy or practice designed to inappropriately prevent or discourage enrollment in, or encourage disenrollment from a health plan based on race, color, ethnicity, national origin, religion, age, gender, gender identity, mental or physical disabilities, sexual orientation, genetic information, including pregnancy and expected length of life, present or predicted disability, degree of medical dependency, quality of life, or other health condition or health status.

Federal laws also forbid discrimination against providers serving high-risk groups or that specialize in conditions requiring costly treatment. We will not select or reject providers based on these factors. All of our government sponsored health plans are subject to restrictions on, and requirements for, marketing and other promotional and/or sales activities and the content of materials.

MEDIA RELATIONS AND SOCIAL MEDIA

In order to provide accurate and complete information about our business to the media, investment analysts, and the investor community, Bright Health Group will respond to the news media in a timely and professional manner only through our designated spokespersons. Employees should contact Corporate Communications if they receive a media outreach.



Social media use

If you participate in electronic communication such as social network sites, blogs, chat rooms, Facebook, Twitter, Instagram, or any similar form of communication, you must not disclose any Bright Health Group confidential information. You must also make clear that the views you express are solely yours and not representative of Bright Health Group's views. The content of your messages may not be discriminatory or harassing towards any person or entity including other associates, managers, members, competitors, or any business partners of the company.





Bright Health Group™