

Amendments to Code of Business Conduct and Ethics

December 6, 2023

Effective December 6, 2023, the Board of Directors of Clover Health Investments, Corp. (the “Company,” or “Clover”) adopted certain amendments to its Code of Business Conduct and Ethics (the “Amended and Restated Code”). The Amended and Restated Code applies to all employees, officers, directors and consultants of the Company. The Amended and Restated Code was adopted to reflect what the Company considers to be current best governance practices and policies for the Company and to make certain technical, administrative, non-substantive amendments to the prior Code of Business Conduct and Ethics. The adoption of the Amended and Restated Code did not relate to, or result in, any waiver, explicit or implicit, of any provision of the prior Code of Business Conduct and Ethics. The amendments are as follows:

- Clarifying that gifts to third parties with which Clover conducts business in amounts less than \$15 per recipient per instance must be approved by the GC and CFO if they are part of a broader program, formal or informal, involving the disbursement of more than \$500 in gifts per year.
- Including training and new employee onboarding training, content regarding Clover’s policies relating to the provision of gifts to third parties with which Clover conducts business.
- Other than for Medicare and other healthcare regulatory compliance items, the Chief Corporate Compliance Officer shall be charged with primary responsibility for education and training pursuant to this Code in respect of general risk assessments and compliance.
- Implementing training shall be mandatory for all directors, officers, and employees of Clover. Training shall be annual for all such persons, and in the event a person is appointed or hired after the annual training for a particular year, a special training session shall be held for such individual within ninety (90) business days of his or her appointment or hiring.
- Implementing training shall include coverage of Clover’s Code of Conduct and manuals or policies established by Clover concerning legal or ethical standards of conduct to be observed in connection with work performed for Clover (including those discussed herein), and rules and regulations related to the healthcare industry and Medicare, including, but not limited to, the Federal False Claims Act, Federal Health Care Fraud Fund, and the Stark Act.
- Implementing training for employees involved in (i) preparing the Company’s financial statements; (ii) communications with the Company’s independent auditor; and (iii) disseminating or producing the Company’s public statements shall include, but not be limited to, coverage of pertinent GAAP principles and the laws and regulations regarding public disclosures.