

CLOVER HEALTH INVESTMENTS, CORP. MARKETING POLICY

(Adopted December 6, 2023)

1. Purpose

Clover Health Investments, Corp. (collectively with its subsidiaries, the “**Company**”) is committed to promoting high standards of honest and ethical business conduct and compliance with applicable laws, rules and regulations. As part of this commitment, the Company has adopted this Marketing Policy (this “**Policy**”). The Company has adopted this Policy to set expectations regarding marketing conduct and provide guidance applicable to all members (“**directors**”) of the Company’s Board of Directors (the “**Board**”) and officers, employees, independent contractors and consultants of the Company (all such persons for purposes of this Policy, “**employees**”). All employees are responsible for reading and understanding this Policy, and using it as a guide to the performance of their responsibilities for the Company, and such Policy shall form a part of employee training.

Anyone who violates the standards in this Policy will be subject to appropriate action, which, in certain circumstances, may include (a) for directors, removal from the Board, legal action or referral for criminal prosecution and (b) for employees, termination of employment or service provider relationship for cause, legal action or referral for criminal prosecution.

2. Marketing Practices

The Company is committed to promoting its products and services responsibly and reporting about its business practices in a fashion that promotes transparency. The Company adheres to all applicable laws and regulations as well as to industry standards. The Company’s marketing activities should follow the highest ethical standards of integrity, honesty, responsibilities and compliance with the laws and regulations that govern the Company’s business operations.

As an entity within the healthcare industry, and one operating Medicare plans, the Company is subject to comprehensive federal, state, and international laws and the Company is regulated by various regulatory agencies, including the Centers for Medicare and Medicaid Services (“**CMS**”). These laws and regulations address, among other things, marketing. The Company is committed to complying with all applicable state and federal laws and regulations. Employees are expected to be familiar with the laws that govern the Company and the services it provides.

The Company is committed to presenting information in a clear and professional manner and being honest, truthful, and forthcoming in all of its marketing materials. The use of deceptive and improper marketing practices is prohibited.

The Company’s sales and marketing efforts seek to accurately inform health decisions and consumer choices. The Company is committed to avoiding unfair commercial practices and coercive selling. The Company seeks to provide consumers with detailed information about products, services and associated risks and benefits. Marketing materials should conform to all appropriate laws, regulations, and Company policies. Appropriate internal approvals should be obtained for marketing materials before they are published.

3. Policy Compliance

Employees are encouraged to talk to their supervisors, managers and other appropriate personnel (including the Chief Corporate Compliance Officer) when in doubt about the application of any provision of this Policy.

4. No Rights Created

This Policy is a statement of fundamental principles, policies and procedures that govern the conduct of the Company's employees. It is not intended to and does not create any legal rights for any business partner, supplier, vendor, competitor, stockholder or any other non-employee or entity.

5. Policy Administration

The Audit Committee and the Risk Committee are each responsible for reviewing this Policy. The Audit and Risk Committees may each request reports from the Company's executive officers about the implementation of this Policy from time to time and may take any steps in connection with the implementation of this Policy as it deems necessary. Each of the Audit and Risk Committee will have the authority to review and assess this Policy and recommend revisions for approval by the Board. The Company will notify directors of any material changes to this Policy.