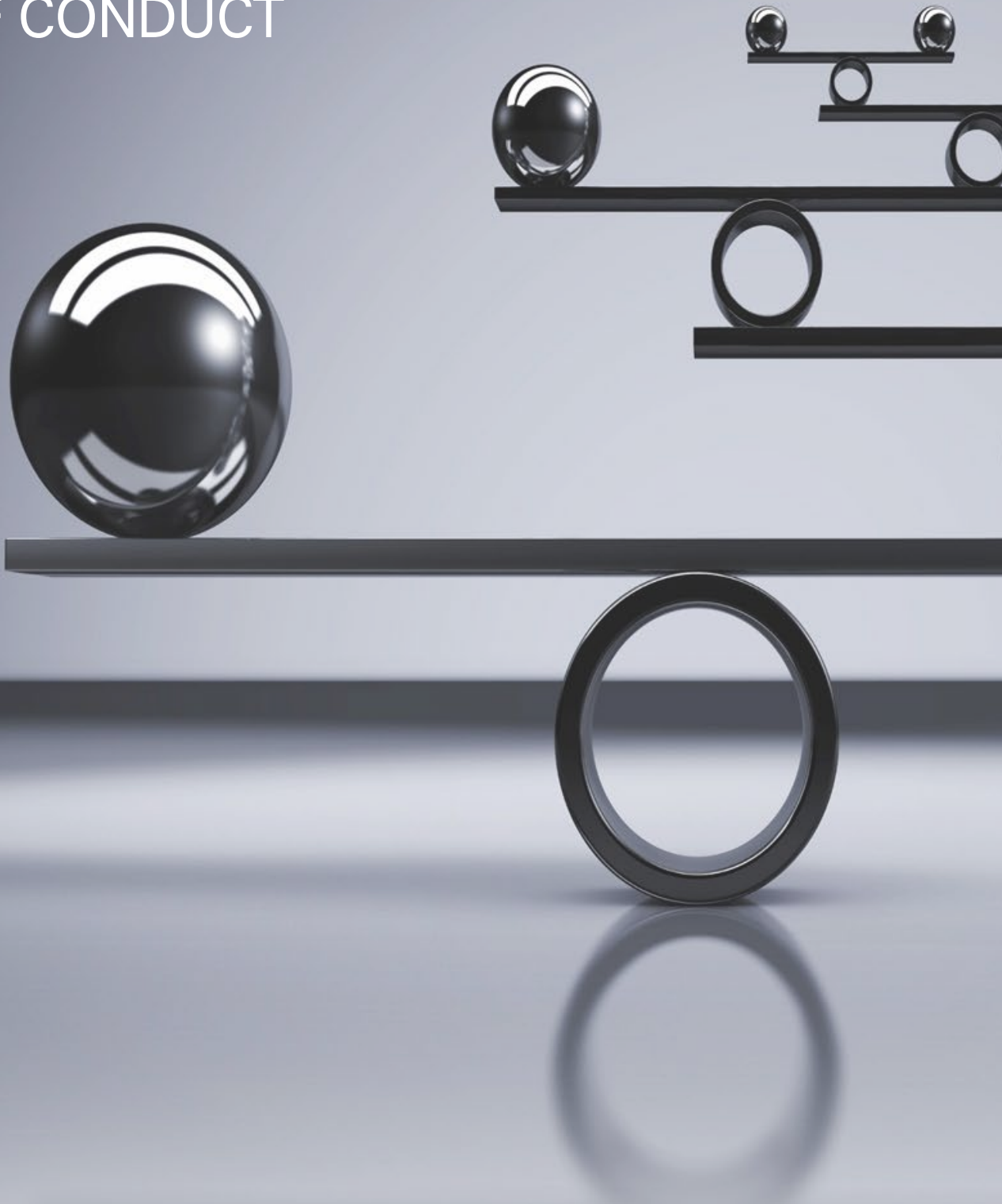


SONDER HEALTH PLANS CODE OF CONDUCT

2024



Sonder
HEALTH PLANS



MISSION

At Sonder Health Plans, our mission is to improve the overall health and well-being of our members and be recognized as a valued and trusted partner in their healthcare journey.

VISION

To make healthcare simple, personal, and affordable by delivering on our commitments and holding ourselves accountable.

Sonder Health Plans is inventing the future by learning from the past. We seek to eliminate our members' financial barriers to healthcare by offering innovative, cost-effective health plan choices.

CORE VALUES

Integrity



Compassion



Community Partner



High Performance



Diversity

A NOTE FROM SUZANNA ROBERTS, CHIEF EXECUTIVE OFFICER

At Sonder Health Plans, we have designed our plans around our members; what they want and what they need from their healthcare. We deliver a high-touch service to every member and provider.

As we continue to grow and have the opportunity to serve more Medicare beneficiaries, our commitment to our core values remains unwavering. We will act with Integrity, show Compassion, be a Community Partner, deliver High Performance, and support Diversity. We value caring for our health plan members, communities we serve, providers, suppliers, payors, and our colleagues. Nothing is more important than maintaining the trust of those we serve. This is a guide for how we conduct ourselves with integrity in all aspects of the company's business and sets expectation in how we operate and achieve results. It is important for all employees to read and follow the Code of Conduct to ensure a respectful and productive work environment.

Sincerely,

Suzanna Roberts

Suzanna Roberts
Chief Executive Officer
Sonder Health Plans, Inc.

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ETHICAL CONDUCT

Sonder Health Plans (Sonder) conducts business honestly and ethically in all of our endeavors. We strive to improve the quality of our services, products, and operations and will maintain a reputation for honesty, fairness, respect, responsibility, integrity, trust, and sound business judgment. Our team adheres to high standards of business and personal integrity at all times.

Sonder's core values start with Integrity. All members of our team are required to behave, perform and represent the company with Integrity. To Sonder Health Plans, this means:

- **Honesty.** Be honest with your coworkers, our members, vendors, partners and all other stakeholders. Do not misrepresent the company internally or externally to stakeholders or anyone else.
- **Accountability.** Take responsibility for what you do. If you make a mistake, acknowledge it, and learn from it. If you don't know the answer, admit it. If you are responsible for a task, complete it.
- **Compliance.** All laws and regulations are followed in every aspect of our business. Follow the policies and procedures whether they are departmental, company wide, Human Resources, Compliance, Operational or otherwise.
- **Work Environment.** Make the work environment the type of place you want to work. Treat your coworkers, members, partners and others with respect and compassion. We expect everyone on the team to support each other in fulfilling our shared Mission and realizing our Vision.

Unethical behavior or actions will result in discipline, up to and including termination of employment. The degree of discipline imposed may be influenced by the existence of voluntary disclosure of any ethical violation and whether or not the violator cooperated in any subsequent investigation.

CODE APPLICABILITY AND DISTRIBUTION

Sonder establishes and adheres to this Code of Conduct. The Compliance Department reviews and can update the Code annually to ensure it remains consistent with applicable regulations and current operations. The Code is disseminated and/or made available to employees, the governing body, subcontractors, providers (referred to as "applicable individuals") within 90 days upon commencement of an employment or other contractual arrangement and annually thereafter. Sonder obtains attestations from employees documenting their review, understanding, and commitment to adhering to the Code. This is expected at the time of annual training and collection of conflict of interest information.

REPORTING VIOLATIONS

How to Report

Sonder is committed to establishing and maintaining an environment which fosters effective communication throughout all levels of the organization. As such, Sonder has adopted an open-door policy where employees are free to ask questions, provide feedback, report potential instances of fraud and abuse, or discuss other potential compliance violations or issues in a confidential setting without fear of retaliation, intimidation, or harassment.

The Chief Compliance Officer (CCO) encourages effective communication by being available to all board members, officers, directors, managers, employees, first tier, downstream and related entities (FDRs) for the reporting of potential instances of fraud, waste, and abuse (FWA), or other compliance related concerns. The CCO maintains a “no wrong door” policy, which means reports don’t have to come through any particular portal or person. The CCO receives reports through direct contact, telephone calls, emails, or anonymous contacts through the Compliance Hotline. As the Sonder lead advocate for compliance-related issues and conduct, the CCO will work closely with all levels of management throughout the organization to ensure Sonder is operating in compliance applicable state and federal laws and regulations. The CCO also ensures the organization maintains a system to track and respond to reports of potential noncompliance or potential FWA received from any source, through any reporting method (e.g., hotline, mail, or in- person).

Internal Reporting of Potential FWA and Significant Non-Compliance

As described in this Code of Conduct, any person, including Sonder FDRs, may confidentially or anonymously report suspected issues of non-compliance or fraud, waste, and abuse by calling the Compliance Hotline toll-free at 888-217-1112 or the Fraud Hotline toll-free at 888-572-0004. If the phone is not answered the caller will hear an automated message, they have reached a confidential voicemail. An individual calling the Hotline may do so anonymously or may choose to self identify. Individuals are encouraged to provide their name and extension, so the Compliance Department can contact them should additional information be required. Compliance makes every effort to maintain the confidentiality of individuals, within the limits of applicable laws.

Suspected issues of non-compliance or fraud, waste and abuse may also be reported in person or in writing to the Compliance Officer:

Amber Dreyer
Chief Compliance Officer
Sonder Health Plans, Inc.
6190 Powers Ferry Rd, Suite 320
Atlanta, FL 30339
adreyer@sonderhealthplans.com

Non-retaliation

Sonder will not tolerate acts of retaliation or intimidation against any individual who makes a good-faith report of known or suspected ethical issues or misconduct. Employees who report in good faith, ask questions, or raise compliance concerns are protected as by this Code and by federal law when engaging in whistleblowing activities. It should be noted that deliberately making a false report via the hotlines, in person or in writing may subject one to disciplinary action, up to and including termination.

External Reporting and Voluntary Self Disclosure

Sonder is required to report fraud, waste, and abuse to the Office of the Inspector General (OIG) and the National Benefit Integrity Medicare Drug Integrity Contract (NBI MEDIC). Investigations of potential fraud, waste, and abuse will be conducted within a reasonable time period after the activity is discovered. If after conducting a reasonable inquiry a determination of potential fraud, waste or abuse related to the Medicare Parts C or D programs has occurred, the matter should be referred to the NBI MEDIC promptly.

CONFLICTS OF INTEREST

Sonder Health Plans is concerned with conflicts of interest that create actual or potential job-related concerns. A conflict of interest is defined as a situation when you have a personal interest that impacts your ability to put Sonder interests first.

Examples of potential conflicts include, but are not limited to:

- Personal relationships with vendors, contractors, investors
- Outside employment such as a second, full time job or personal business
- Use of company assets or reimbursement for political activities
- Relationships in the workplace where direct supervision exists

If there is any actual or potential conflict of interest, you must disclose it to management. If an actual or potential conflict of interest is determined to exist, the company will take such steps as it deems necessary to manage or eliminate the conflict. All employees will be required to sign an annual Conflict of Interest Statement and report any potential conflicts of interest and are expected to file interim statements, if a conflict arises.

Outside Employment

Outside employment that creates a conflict of interest or that affects the quality or value of your work performance or availability at Sonder Health Plans is prohibited. Sonder recognizes that you may seek additional employment during off hours, but in all cases expects that any outside employment will not affect your attendance, job performance, productivity, work hours, or scheduling, or would otherwise adversely affect your ability to effectively perform your duties or in any way create a conflict of interest.

Political Activities

Sonder fully expects employees will participate in political activities and exercise their right to support the politicians or causes that are meaningful to them. This must be done on the employee's personal time and may not involve any company funds or assets.

Personal and Financial Relationships

Sonder believes personal relationships between other individuals in Sonder or an individuals with whom Sonder has a contract that adversely impacts the company have a potential for a conflict. There may be situations when a relationship involves direct supervision of individuals who are extended / immediate family or a romantic or close personal relationship. These relationships should be reported to Compliance to determine if a conflict actually exists and if mitigation is possible.

Gifts & Entertainment

The giving and accepting of gifts in business transactions needs to be cautiously considered, due to the fact they could be interpreted as a tool to influence decisions and interfere with the integrity of business relationships. You may not accept any gift if it could compromise your decision-making on behalf of Sonder. Generally, no gifts or business courtesies are permissible when state or federal officials or regulators are involved. Any situations where an employee is uncertain about permissible activities should be reported to the Compliance Department for review.

Business courtesies as part of a legitimate business activity can be accepted or given if they meet these conditions:

- Gift is nominal in value, generally no more than \$100 in value
- Gift is not cash or cash equivalent
- Gift is not related to approval of a contract or other negotiation of business

WORKPLACE CONDUCT

We believe Sonder and its employees will be the most successful if everyone contributes to a workplace culture of professionalism, respect, and individual accountability. Under our common sense rules of conduct, we expect all employees to exhibit honesty by:

- Respecting all people, systems, processes, and policies. Talking openly and often to your manager about workplace opportunities or concerns to ensure all people receive fair and equitable treatment.
- Ensuring all information entered in company systems or records is accurate and complete.
- Using company property and resources only when reasonable, necessary, and business related.
- Safeguarding member data and other confidential information from unauthorized disclosure or transmission outside of company systems.

- Treating every customer, client, or visitor with the utmost respect and courtesy during your working time. You should never argue or act in a disrespectful manner towards a visitor, customer or fellow employee.

Standards of Conduct

To ensure safety and security and provide the best possible work environment, Sonder expects employees to follow basic, common sense rules of conduct that will protect everyone's interests and safety. The purpose of these rules is not to restrict employees' rights to express themselves or advocate for change, but rather to be certain that each employee understands what conduct is expected and necessary to support our mission and engage employees in achieving both business and personal goals. It is not possible to list all forms of behavior that are considered unacceptable in the workplace, but the following are examples of infractions of rules that may result in disciplinary action up to and including termination of employment:

- Dishonesty; falsification, misrepresentation, or omission on application for employment or other work records; unauthorized alteration of company records or other company documents; deliberately entering inaccurate or misleading information in systems.
- Falsification of any timecard or record, entering time for or permitting time to be entered by someone else; altering time records to make them reflect more or less time than that worked; directing, coercing, or encouraging someone to work "off the clock" or submit inaccurate time records.
- Working overtime without authorization or unreasonably refusing to work assigned hours.
- Having an unreasonable pattern or excessive number of absences (absences that are protected by law or policy will not be considered as unreasonable or excessive).
- Failing to observe working schedules, including meals and scheduled breaks.
- Refusing to meet expectations established by managers about the job role, including whether the job requires being in a particular workspace, such as in the office.
- Theft or the deliberate or careless damage or waste or appropriation of any company property or the property of any employee or client, including failure to report damage to or caused by company equipment.
- Abuse of Sonder's electronic resources for non-work purposes during working time or in a manner that interferes with the employee's work performance.
- Unauthorized disclosures or handling of information including violating HIPAA regulations; deliberate or repeated failure to follow information security policies; unauthorized disclosure of confidential information; violating confidentiality obligations or restrictive employment agreements from a prior employer or business associate while conducting company business; use of personal computers to conduct Sonder business.
- Possessing, distributing, selling, transferring, using or being under the influence of alcohol or illegal drugs or drugs prescribed for someone else in the workplace or at a company or company sponsored event.
- Provoking a physical fight or engaging in physical fighting during working hours or on

premises owned or occupied by the company or at any company or company sponsored event.

- Carrying firearms, weapons, or dangerous substances at any time, on premises owned or occupied by the company or at a company or company sponsored event, unless state law provides otherwise.
- Using abusive, violent, threatening, or vulgar language at any time during working hours or while on premises owned or occupied by Sonder.
- Engaging in controversial conversations about religion, politics, and sex that can/will cause offense to others.
- Abusing, misusing, or improperly obtaining company benefits, including leaves and time off.
- Violating any Sonder policy, rule, or procedure.

Open Door/Conflict Resolution Policy

Sonder Health Plans strives to provide a comfortable, productive, legal, and ethical work environment. To this end, we want you to bring any problems, concerns, or grievances you have about the workplace to the attention of your manager and, if necessary, to Human Resources or upper-level management.

If you believe there is inappropriate conduct or activity on the part of Sonder, management, its employees, vendors, customers, or any other persons or entities related to Sonder, bring your concerns to the attention of your manager at a time and place that will allow the person to properly listen to your concern. Most problems can be resolved informally through dialogue between you and your immediate supervisor. If you have already brought this matter to the attention of your manager previously and do not believe you have received a sufficient response, or if you believe that person is the source of the problem, present your concerns to Human Resources or the CCO.

HEALTHY WORK ENVIRONMENT

Sonder Health Plans is committed to providing a safe, healthy, and productive work environment. Consistent with this commitment, it is the intent of Sonder to maintain a drug and alcohol-free workplace. Being under the influence of alcohol, illegal drugs (as classified under federal, state, or local laws), or other impairing substances while on the job may pose a serious health and safety risk to others and will not be tolerated.

Drugs and Alcohol Policy

Sonder expressly prohibits employees from engaging in the following activities when they are on duty or conducting company business or on company premises (whether or not they are working):

- The use, abuse, or being under the influence of alcohol, illegal drugs, or other impairing substances.

- The possession, sale, purchase, transfer, or transit of any illegal or unauthorized drug, including prescription medication that is not prescribed to the individual, or drug-related paraphernalia.
- The illegal use or abuse of prescription drugs.

While the use of marijuana has been legalized under some state laws for medicinal and/or recreational uses, it remains an illegal drug under federal law. Sonder does not discriminate against employees solely based on their lawful off-duty use of marijuana. You may not consume or be under the influence of marijuana while on duty or at work. If you have a valid prescription for medical marijuana, refer to the Sonder Disability Accommodation policy for additional information.

Nothing in this policy is meant to prohibit your appropriate use of over-the-counter medication or other medication that can legally be prescribed under both federal and state law if it does not impair your job performance or safety or the safety of others. If you take over-the-counter medication or other medication that can legally be prescribed under both federal and state law to treat a disability, inform your Manager if you believe the medication may impair your job performance, safety, or the safety of others or if you believe you need a reasonable accommodation before reporting to work while under the influence of that medication.

Possessing, distributing, selling, transferring, using or being under the influence of alcohol or illegal drugs or drugs prescribed for someone else in the workplace is strictly prohibited and is cause for discipline, up to and including termination of employment.

Tobacco Usage

Sonder Health Plans is committed to maintaining a safe and healthy workplace. Tobacco usage is permitted only in designated outside areas and is banned in any area inside company buildings or facilities. This applies to all types of tobacco, including smokeless forms. We ask employees who have visitors to clearly inform them of this policy to prevent violations.

Employer-Sponsored Events

From time to time, Sonder may sponsor social or business-related events where alcohol may be served. This policy does not prohibit the use or consumption of alcohol at these events. However, if you choose to consume alcohol at such events, you must do so responsibly and maintain your obligation to always conduct yourself properly and professionally.

Violations

Violation of this policy may result in disciplinary action, up to and including termination of employment.

Policy Against Workplace Violence

As the safety and security of our employees, vendors, contractors, and the public is of the utmost importance to Sonder Health Plans, we are committed to working with our employees to provide a work environment free from violence, intimidation, and other disruptive behavior.

Zero Tolerance Policy

Sonder has a zero-tolerance policy regarding workplace violence and will not tolerate acts or threats of violence, harassment, intimidation, and other disruptive behavior, either physical or verbal, which occurs in the workplace or outside the workplace. This applies to management, coworkers, employees, and non-employees such as contractors, customers, and visitors.

Workplace violence can include verbal or written statements, gestures, or expressions that communicate a direct or indirect threat of physical harm, damage to property, or any intentional behavior that may cause a person to feel threatened.

Reporting Incidents of Violence

Report to your Supervisor, Manager, Senior Leadership or the Human Resources department, in accordance with this policy, any behavior that compromises our ability to maintain a safe work environment. All reports will be investigated immediately and kept confidential, except where there is a legitimate need to know. You are expected to cooperate with any investigation of workplace violence.

Anti-Harassment/Discrimination

Sonder is committed to providing a work environment that is free of harassment, discrimination, or retaliation based on any protected characteristics. As a result, Sonder maintains a strict policy prohibiting sexual harassment and harassment against employees, applicants for employment, individuals providing services in the workplace pursuant to a contract, unpaid interns or volunteers based on any legally-recognized basis, including, but not limited to, their actual or perceived race, religious creed, color, national origin, ancestry, physical or mental disability, medical condition, genetic information, marital status (including registered domestic partnership status where applicable), sex (including pregnancy, childbirth, lactation and related medical conditions), gender (including gender identity and expression), age (as defined by state law), sexual orientation, military and veteran status and any other consideration protected by federal, state or local law (sometimes referred to, collectively, as “protected characteristics”). All such harassment is prohibited.

This policy applies to all persons involved in our operations, including coworkers, supervisors, managers, temporary or seasonal workers, agents, clients, vendors, customers, or any other third party interacting with Sonder (“third parties”) and prohibits proscribed harassing conduct by any employee or third party of Sonder, including nonsupervisory employees, supervisors, and managers. If such harassment occurs on Sonder’s premises or is directed toward an employee or a third party interacting with Sonder, the procedures in this policy should be followed.

Sexual Harassment Defined

Sexual harassment is defined as unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature when:

1. Submission to such conduct is made either explicitly or implicitly a term or condition of an

individual's employment.

2. Submission to, or rejection of such conduct by an individual is used as the basis for employment decisions affecting such individual; or
3. Such conduct has the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile, or offensive work environment.

Sexual harassment also includes various forms of offensive behavior based on sex and includes gender-based harassment of a person of the same sex as the harasser. While it is not possible to identify every act that constitutes or may constitute sexual harassment, the following are some examples of sexual harassment:

- Unwelcome requests for sexual favors.
- Lewd or derogatory comments or jokes.
- Comments regarding sexual behavior or the body of another.
- Sexual innuendo and other vocal activity such as catcalls or whistles.
- Obscene letters, notes, emails, invitations, photographs, cartoons, articles, or other written or pictorial materials of a sexual nature.
- Repeated requests for dates after being informed that interest is unwelcome.
- Retaliating against another for refusing a sexual advance or reporting an incident of possible sexual harassment to Sonder or any government agency.
- Offering or providing favors or employment benefits such as promotions, favorable evaluations, favorable assigned duties or shifts, etc., in exchange for sexual favors; and
- Any unwanted physical touching or assaults or blocking or impeding movements.

Other Types of Harassment

Sonder Health Plans has a strict policy against all types of workplace harassment, including other forms of workplace harassment based upon an individual's age, race, color, national origin, ancestry, religion, sex, sexual orientation (including transgender status, gender identity or expression), pregnancy (including childbirth, lactation, and related medical conditions), physical or mental disability, genetic information (including testing and characteristics), veteran status, uniformed servicemember status, or any other status protected by federal, state, or local laws. All forms of harassment of, or by, employees, vendors, visitors, customers, and clients are strictly prohibited and will not be tolerated. While it is not possible to list all the circumstances that may constitute other forms of workplace harassment, the following are some examples of conduct that may constitute workplace harassment:

- The use of disparaging or abusive words or phrases, slurs, negative stereotyping, or threatening, intimidating, or hostile acts that relate to the above protected categories.
- Written or graphic material that insults, stereotypes, or shows aversion or hostility toward an individual or group because of one of the above protected characteristics and that is placed on walls, bulletin boards, email, voicemail, or elsewhere on our premises, or circulated in the workplace; and

- A display of symbols, slogans, or items that are associated with hate or intolerance toward any select group.

Reporting Discrimination and Harassment

If you feel that you have witnessed or have been subjected to any form of discrimination or harassment, immediately notify Human Resources or any member of management.

Sonder prohibits retaliation against employees who, based on a reasonable belief, provide information about, complain, or assist in the investigation of any complaint of harassment or discrimination. We will promptly and thoroughly investigate any claim and take appropriate action where we find a claim has merit. To the extent possible, we will maintain the confidentiality of those who report suspected or alleged violations of the harassment policy. Discipline for violation of this policy may include, but is not limited to, reprimand, suspension, demotion, transfer, and discharge.

If Sonder determines that harassment or discrimination occurred, corrective action will be taken to effectively end the harassment. As necessary, Sonder may monitor any incident of harassment or discrimination to ensure that the inappropriate behavior has stopped. In all cases, Sonder will follow up as necessary to ensure that no individual is retaliated against for making a complaint or cooperating with an investigation.

Protection Against Retaliation

Retaliation is prohibited against any person by another employee or by Sonder for using Sonder's complaint procedure, reporting discrimination or harassment, or filing, testifying, assisting, or participating in any manner in any investigation, proceeding or hearing conducted by a Governmental enforcement agency.

Prohibited retaliation includes, but is not limited to, termination, demotion, suspension, failure to hire or consider for hire, failure to give equal consideration in making employment decisions, failure to make employment recommendations impartially, adversely affecting working conditions or otherwise denying any employment benefit.

Employee Complaint and Investigation Process

It is Sonder's policy to develop a work climate that encourages management and employees to openly express ideas and feelings about their employment at Sonder. We want to identify causes of dissatisfaction and ensure that all employees receive fair and equitable treatment. It is the intent of Sonder to resolve employee concerns at the lowest possible level without external involvement. For this reason, concerns should first be discussed with your Supervisor/Manager or departmental leadership, and if they are not able to resolve, then you should contact Human Resources.

USE OF COMPANY ASSETS AND USE OF TECHNOLOGY

Company Communications Systems

This policy is intended to provide Sonder Health Plans employees with the guidelines associated with the use of Sonder information technology (IT) resources and communication systems. Sonder Health Plans is committed to respecting privacy and keeping important personal information confidential. We expect the same from employees when utilizing information technology tools.

Security Requirements

All devices used for Sonder or on behalf of Sonder must be registered with and authorized by the company and its Information Technology services provider. Use of a personal device to contact your supervisor is permitted (for example, to inform your supervisor of an unexpected absence). To protect Sonder's confidential business information from being lost or becoming public, you must immediately report any device used for Sonder's business or on behalf of Sonder that is lost, stolen, accessed by unauthorized persons or otherwise compromised so Sonder can assess the risk and, if necessary, remotely erase the entire device. You must also promptly provide Sonder with access to the device when requested or required for Sonder's legitimate business purposes, including in the event of any security incident or investigation.

Sonder's IT Resources and Communications Systems Policy applies to all uses of your device for Sonder's business or on behalf of the company. In addition to requirements outlined in company's IT Resources and Communications Systems Policy, you must:

- Install security software at Sonder's request and consent to Sonder's efforts to manage the device and secure its data, including providing the company with any necessary passwords.
- Comply with Sonder's device configuration requirements.
- Maintain the device's original operating system and keep it current with security patches and updates.
- Do not download and install software unless explicitly authorized by the company.
- Do not alter the security settings of the device without Sonder's consent.
- Prohibit use of the device by anyone not authorized by Sonder, including your family, friends and business associates.
- Do not download or transfer work product or sensitive business content to a personal device or computer, for example, via e-mail attachments. You must erase any such information that is inadvertently downloaded to your device.
- Do not back up your device locally or to cloud-based storage or services that is not part of Sonder's network. Any such backups inadvertently created must be deleted immediately.

PROTECTION OF INFORMATION

Confidentiality and Nondisclosure of Trade Secrets

As a condition of employment, Sonder Health Plans employees are required to protect the confidentiality of company trade secrets, proprietary information, and confidential commercially sensitive information (i.e., financial or sales records/reports, marketing or business strategies/plans, product development, customer lists, patents, trademarks, etc.) related to Sonder. Access to this information should be limited to a "need to know" basis and should not be used for personal benefit, disclosed, or released without prior authorization from management.

If you have information that leads you to suspect that employees are sharing such information in violation of this policy and/or competitors are obtaining such information, you are required to inform your Supervisor or appropriate department. Violation of this policy may result in disciplinary action up to and including termination, and may subject the violator to civil liability.

Sonder's confidential information and intellectual property, including trade secrets, are extremely valuable to the company. You must treat them accordingly and not jeopardize them through your use of your own device. Disclosure of Sonder's confidential information to anyone outside Sonder and use of Sonder's intellectual property is subject to Sonder's Confidential Information policy.

Any work product created, stored or maintained by you or your device is subject to Sonder's Confidential Information policy. You will be subject to disciplinary action up to and including termination of employment for violation of this policy.

Record Retention

Sonder complies with CMS regulations by maintaining files for a period of current contract year plus 10 years. The records that must be retained include those that will allow for routine or targeted auditing of:

- Financial records and supporting data and documentation
- All information related to bid development
- Services and transactions performed under Sonder's contracts with CMS

These records may be documents, policies, system data, contracts, and financial / tax statements. No data, documents or electronic files are to be permanently deleted or destroyed without a review by the CCO to determine if it must be retained to meet the requirements described above.