

Code of Ethics & Conduct



Babylon was founded with a single purpose: to put an accessible, affordable health service into the hands of every person on earth. Everything else flows from this; our values and the way we behave, what we expect, and the way we work with each other to deliver our mission.

Babylonians share three values: Dream big. Build fast. Be brilliant. But because values are only words until you put them into action, we live these values through six behaviours: Compassionate, Ownership, Positivity, Creativity, Tenacity, Inclusivity. These values are the foundation for how Babylonians relate to and interact with our mission, each other, our business partners, and our members.

The Code serves as your guide to how we conduct ourselves with the highest standards of ethics, integrity, and responsibility.

This Code of Ethics and Conduct (the “Code”) is born out of these behaviours. The Code serves as your guide to how we conduct ourselves with the highest standards of ethics, integrity, and responsibility. Since Babylon is a healthcare company, it is even more important to adhere to these standards. If you have a question regarding any aspect of this Code, please contact compliance@babylonhealth.com.

Introduction

This Code is designed to deter wrongdoing and to promote fair and accurate financial reporting; compliance with applicable laws, rules and regulations including, without limitation, full, fair, accurate, timely and understandable disclosure in reports and documents Babylon files with, or submits to, the U.S. Securities and Exchange Commission and in Babylon’s other public communications; the prompt internal reporting of violations of this Code as set forth in this Code; honest and ethical conduct, including the ethical handling of actual or apparent conflicts of interest; and a culture of honesty and accountability. All Babylonians (together with any subsidiaries, collectively “Babylonians”), including full-time and part-time employees, vendors, contractors, consultants, agents, trainees, management and employed medical staff, as well as all directors, officers, the Board, volunteers, and other entities

providing services on behalf of Babylon ("Workforce Members") must read and adhere to this Code of Ethics and Conduct.

This Code is meant as a guide to help you make good choices in your day-to-day work and conduct yourself in accordance with Babylon's values and our commitment to ethics and integrity. All Babylonians are expected to adhere to high standards of ethical conduct, and to comply with and assist Babylon in complying with all standards and policies, applicable law, and healthcare program or client contractual requirements. Violations of this Code should be reported, and all reports of potential violations of this Code will be taken seriously and investigated in accordance with Babylon's just culture approach to incident reporting and handling.

For purposes of this Code, Babylon's Head of Compliance serves as the Compliance Officer. The Compliance Officer may designate others, from time to time, to assist with the execution of his or her duties under this Code.

Employees are expected to read the policies set forth in this Code and ensure that they understand and comply with them. The Compliance Officer is responsible for applying these policies to specific situations in which questions may arise and has the authority to interpret these policies in any particular situation. You should direct any questions about this Code or the appropriate course of conduct in a particular situation to your manager, the Compliance Officer or human resources, who may consult with Babylon's outside legal counsel or Babylon's board of directors (the "Board"), as appropriate.

You should read this Code in conjunction with other policies applicable to employees.

Code of Ethics and Conduct

Ethical and Professional Standards

All Babylonians shall act with integrity and comply with and perform their services consistent with high ethical and professional standards. They shall treat patients, co-workers, and others in a professional manner with honesty, fairness, dignity and respect. Standards for professionalism may be determined by applicable laws and regulations, professional licensing boards, Babylon policies and procedures, and the standards of organizations in which Babylon participates, including the principles of the Association of British Health Industries (ABHI).

All Babylonians shall act with integrity and comply with and perform their services consistent with high ethical and professional standards.

Policies and Procedures

All Babylonians shall comply with all applicable Babylon policies and procedures, including but not limited to those policies and procedures relevant to Information Security, Privacy, Medical Device requirements, and to Governance, Risk and Compliance.

Laws, Regulations, and Program Requirements

Babylon is committed to obeying the law(s) and regulations of each of the jurisdictions we operate in, and we do not compromise on compliance. All Babylonians and any contractors or suppliers are expected to comply with all applicable country and state laws, regulations, healthcare programs and client contractual requirements.

Non-Discrimination

Babylon does not tolerate any discrimination or harassment on the basis of race, gender, religion, sexual orientation, gender identity and/or expression, national origin, ancestry, citizenship status, marital status, age, disabilities, genetic information, status with respect to public assistance, veteran status, or any other characteristic protected by national, federal, state, or local laws.

Modern Slavery

Babylon Holdings Limited (including Group companies) (the “Company” or “Babylon”) is committed to carrying on its business fairly, honestly and openly. We take a zero-tolerance approach to modern slavery in both our business and our supply chain.

We have reviewed our existing risk management processes following the introduction of the Modern Slavery Act 2015 (“MSA”) to determine to what extent measures already exist, and what further measures may be required to prevent slavery and human trafficking taking place in any part of our businesses or in our supply chains.

Financial Reports and Other Records - Disclosure

All Babylonians are responsible for the accurate and complete reporting of financial information within their respective areas and for the timely notification to senior management of financial and non-financial information that may be material to Babylon to ensure full, fair, accurate, timely and understandable disclosure in reports and documents that Babylon files with government agencies or releases to the general public.

Each employee involved in Babylon's disclosure process must familiarize themselves with the disclosure requirements applicable to Babylon and the business and financial operations of Babylon, and must not knowingly misrepresent, or cause others to misrepresent, facts about Babylon to others, whether within or outside Babylon, including to Babylon's independent auditors, governmental regulators and self-regulatory organizations.

Employees must maintain all of Babylon's books, records, accounts and financial statements in reasonable detail, and reflect the matters to which they relate accurately, fairly and completely. Furthermore, employees must ensure that all books, records, accounts and financial statements conform both to applicable legal requirements and to Babylon's system of internal controls. Employees must carefully and properly account for all assets of Babylon. Employees may not establish any undisclosed or unrecorded account or fund for any purpose. Employees shall not make any false or misleading entries in Babylon's books or records for any reason, or disburse any corporate funds or other corporate property without adequate supporting documentation and authorization. Employees shall not misclassify transactions related to accounts, business units or accounting periods. Each employee bears responsibility for ensuring that they are not party to a false or misleading accounting entry.

Anti-Bribery / Anti-Corruption

The Company has a "zero tolerance" policy and strictly prohibits all forms of bribery and corruption, regardless of whether they involve a public official or a private person. Bribery and corruption are antithetical to the Company's commitment to operating with the utmost integrity and transparency. Employees may only transact business on behalf of the Company in foreign markets and with foreign government officials in accordance with the Company's established policies regarding foreign corrupt practices and/or any applicable law, including the United States Foreign Corrupt Practices Act (the "FCPA"), the United Kingdom Bribery Act of 2010 (the "UK Bribery Act"), the United States Travel Act and Title 18 of the United States Code section 201. Employees must never engage in any bribery, kickbacks or other types of corruption when dealing with customers, suppliers or other third parties regardless of local practices or competitive intensity. Specifically, employees must never directly or indirectly via a third party make or provide a payment (including cash or any other items of value such as meals, gifts, travel, entertainment, etc.) to a foreign official or government employee to corruptly influence the foreign official or government

employee, obtain or retain business for the Company or to acquire any improper advantage.

If employees are unaware of the legal rules involving these activities, they should consult with the Compliance Officer before taking any such action. For more information about the FCPA, the UK Bribery Act, and the rules governing providing things of value to foreign officials, please reference our Global Anti-Bribery and Anti-Corruption Policy, which can be found on the Company's internal website, or contact the Compliance Officer.

Conflicts of Interest

A conflict of interest is any activity or interest that is inconsistent with or opposed to the best interests of Babylon. Your decisions and actions in the course of employment or other relationship with Babylon should be based on Babylon's best interests and not based on personal relationships or benefits. You should avoid situations where your personal activities and relationships conflict, or appear to conflict, with Babylon's interests. Any situation, transaction or relationship that may give rise to an actual or potential conflict of interest must be disclosed to Babylon and shall be avoided, unless approved by Babylon.

The following are some examples of Conflicts of Interest to be avoided:

Family Members: Employees may not conduct business on behalf of Babylon with family members or an organization with which a family member is associated, unless such business relationship has been disclosed to, and authorized by, Babylon and is a bona fide arms-length transaction. "Family members" include a child, stepchild, parent, stepparent, spouse, sibling, mother-in-law, father-in-law, son-in-law, daughter-in-law, brother-in-law, sister-in-law and any person (other than a tenant or employee) sharing the household of an employee.

Interests in Other Businesses: Employees may not accept compensation in any form for services performed for Babylon from any source other than Babylon. Employees should not have an undisclosed material financial interest in a competitor, supplier, customer or business partner of Babylon.

Improper Conduct and Activities: Employees may not engage in any conduct or activities that materially disrupt or impair Babylon's relationship with any person or entity with which Babylon has or proposes to enter into a business or contractual relationship.

All Babylonians must act in the best interests of Babylon and must have no relationships, financial or otherwise, with any entity or vendor that might conflict or

appear to conflict with the Workforce Member's duty to act in Babylon's best interest. If a vendor's employee has a family or other personal relationship with a Babylon Workforce Member, or if a Babylon Workforce Member or their spouse, domestic partner, or other family member or relative holds a significant financial interest in the vendor, the vendor must disclose this fact to Babylon and discuss whether there may be a conflict of interest to resolve. When in doubt, the vendor should notify Babylon in a timely fashion with the details of the relationship so the conflict can be resolved or mitigated.

Evaluating whether a conflict of interest exists can be difficult and may involve a number of considerations. Please reference the Company's Global Anti-Bribery and Anti-Corruption Policy for further information. Employees should seek guidance from their manager, the Compliance Officer or human resources when they have any questions or doubts.

If an employee is aware of an actual or potential conflict of interest where their interests may conflict with the Company's interests, or is concerned that a conflict might develop, they should discuss with your manager and then obtain approval from the Compliance Officer or their designee before engaging in that activity or accepting something of value.

Professional Courtesies, Gifts/Gratuities, Inducements

This Code does not prohibit modest meals, gifts, or entertainment to or from private third parties that conduct business with Babylon, provided the value is reasonable (not lavish or excessive), is in good taste, related to a legitimate business purpose, lawful under local laws, and properly recorded in Babylon's books and records. You should, however, be mindful that public officials may be restricted in the benefits they can accept for performing their duties, including non-cash benefits such as travel, meals and entertainment. The practice of giving business gifts and taking part in corporate hospitality or undertaking speaking engagements varies between countries, regions and industries. What may be normal and acceptable in one may not be in another. The test to be applied is whether in all the circumstances the gift or hospitality is reasonable and justifiable (both from the perspective of the provider and recipient) rather than lavish and extraordinary; bearing in mind that what may normally be viewed as small or insignificant in some countries can be of significant value in another. The intention behind the gift should always be considered and nothing should be explicitly or implicitly expected or demanded in return. The giving of gifts and corporate hospitality or entertainment is not prohibited, if the following requirements are met:

- it is done in the normal course of Babylon's business and without the intention of, or without a reasonable prospect of, influencing a third party to obtain or retain an improper business advantage, or to reward the provision or retention of an improper business advantage, or in explicit or implicit exchange for favors or benefits
- it complies with applicable law
- it does not include cash or a cash equivalent
- it must be properly recorded and disclosed, and not paid personally to avoid any approval or disclosure requirements
- taking into account the reason for the gift or hospitality, it is of an appropriate type and value in the applicable country/region and given at an appropriate time
- it is given openly and in Babylon's name, not secretly
- it is not given or received frequently between the same individuals, and
- gifts or hospitality should not be offered to public officials or government representatives, or politicians or political parties, without the prior approval of the Compliance Officer

Any questions about gifts and gratuities should be directed to the Compliance Officer.

Babylon US Products/Services: US federal and state laws prohibit paying, offering or receiving anything of value ("kickback") to induce referrals for healthcare business unless certain specific conditions are met. A "kickback" can be any offering or receiving of any money, gifts, free or discounted items or services, professional courtesies, or other arrangements with the intent to induce referrals. This applies to any such transactions involving potential referral sources, including transactions with other healthcare providers, suppliers, or patients, including waiving or discounting of potential or current client/patient co-pays unless such discount complies with Babylon's and clients' policies and procedures. Under no circumstances shall any Babylon Workforce Member offer, solicit, pay or accept anything of value in exchange for healthcare referrals or offer any other discount, gift, free items or service, or other inducements to potential or current clients/patients without first obtaining approval from Compliance. Violations may subject Babylon and responsible Workforce Members to criminal and civil penalties.

US federal and state laws affect contracts, agreements, and other financial relationships with physicians, practitioners, vendors and other referral sources. Babylon Workforce Members shall not enter any contract or other financial

arrangement with an outside physician, a physician's family member, or other referral source without the prior approval of Risk and Compliance. If Babylon has a contract or other financial relationship with an outside physician or a member of the physician's family, Babylon Workforce Members shall not bill US government programs (e.g., Medicare, Medicaid) for any items or services referred by that physician without the prior approval of Risk and Compliance.

Personal Use of Company Assets

Employees should treat Company owned equipment with care and use the equipment and tools with Babylon's interests in mind. Employees should also use good judgment in using Company assets for personal matters. Babylon permits reasonable personal use of Company owned equipment, but employees should be aware that all electronic information and equipment remain the sole property of Babylon.

Corporate Opportunities

Except as otherwise set forth in the Company's memorandum and articles of association, employees owe a duty to the Company to advance the Company's business interests when the opportunity to do so arises. Employees are prohibited from taking or directing to a third party to take, a business opportunity that is discovered through the use of corporate property, information or position, unless the Company has already been offered the opportunity and turned it down. Employees are further prohibited from competing with the Company directly or indirectly during their employment with the Company and as otherwise provided in any written agreement with the Company.

Sometimes the line between personal and Company benefits is difficult to draw, and sometimes there are both personal and Company benefits in certain activities. Employees should discuss with their manager, the Compliance Officer or Human Resources if they have any questions.

Protection of Assets, Confidentiality and Communications

All employees should endeavor to protect the Company's assets and ensure their efficient use. Any suspected incident of fraud or theft should be reported immediately to the employee's manager or the Compliance Officer for investigation.

In carrying out the Company's business, employees may learn confidential or proprietary information about the Company, its customers, suppliers or business partners. Confidential or proprietary information of the Company, and of other

companies, includes any non-public information that would be harmful to the relevant company or useful to competitors if disclosed.

Employees must maintain the confidentiality of information about the Company and other companies entrusted to them by the Company, use the information only for permissible business purposes and in accordance with any restrictions imposed by the disclosing party, and limit dissemination of the confidential information, both inside and outside the Company, to people who need to know the information for business purposes and who are bound by similar obligations of confidentiality, unless disclosure is authorized or legally mandated.

The obligation to protect confidential information does not end when an employee leaves the Company. Any questions about whether information is confidential should be directed to the Compliance Officer.

Any employee who is contacted by a member of the financial community, the press or any other outside organization or individual may not provide information regarding the Company's business except pursuant to the External Communications Policy on the Company's internal website, which includes information concerning Regulation FD compliance. This includes, among other things, answers to questions on overall business trends, business in different geographies, pricing, suppliers, new products or technologies, lawsuits or disputes.

Fair Dealing

Babylon has a history of succeeding through honest business competition. Babylon does not seek competitive advantages through illegal or unethical business practices. Each employee should endeavor to deal fairly with the Company's customers, service providers, suppliers, competitors, business partners and employees. No employee should take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts or any unfair dealing practice.

Many laws and regulations define and promote fair business practices to protect the competitive environment. US federal and state antitrust laws prevent certain anti-competitive conduct, including collusive agreements among competitors to set prices; dividing patient care or services and boycotting other entities. To comply with these laws, all Babylonians shall deal fairly with customers, service providers, suppliers, and employees. Workforce Members shall not engage in collusive discussions with competitors over such things as prices, employee wages, services to be rendered or eliminated, or division of patients or patient services. Similarly, Workforce Members should not discuss exclusive arrangements with third-party clients, suppliers, and

providers without first discussing the matter with the Compliance Officer. Finally, employees should not engage in any deceptive acts or practices relating to Babylon.

Compliance with Laws, Rules and Regulations

All employees must respect and obey all laws when carrying out responsibilities on behalf of the Company and refrain from illegal conduct.

Employees have an obligation to be knowledgeable about specific laws, rules and regulations that apply to their areas of responsibility. If a law conflicts with a policy in this Code, employees must comply with the law.

Any questions as to the applicability of any law should be directed to the Compliance Officer.

Antitrust

Antitrust laws (or, as they are known in most of the world, “competition” laws) are designed to foster competitive markets and prohibit activities that unreasonably restrain trade. In general, actions taken in combination with another company that unreasonably reduce competition may violate antitrust laws. Certain types of agreements with competitors (including, but not limited to, agreements on prices and output) are always illegal and may result in criminal penalties such as prison terms for the individuals involved and large fines for the corporations involved. In addition, unilateral actions by a company with market power in the sale or purchase of a particular good or service may violate antitrust laws if those actions unfairly exclude competition. As a result of the numerous antitrust laws and enforcement regimes in various jurisdictions, at times it is possible that certain actions may simultaneously violate some jurisdictions’ antitrust laws while not violating other jurisdictions’ antitrust laws.

The Company is dedicated to complying with the numerous laws that govern competition. Any activity that undermines this commitment is unacceptable. The laws governing this area are complex, and employees should reach out to the Compliance Officer before taking any action that may implicate these laws whenever appropriate.

Health, Safety and Environment

The Company works to conduct its business activities and operations in a manner that promotes protection of people and the environment to the extent practicable. Employees are responsible for complying with all applicable laws, rules and regulations governing health, safety and the environment.

Fair Employment Practices

The Company strives to maintain a work environment in which all individuals are treated with respect and dignity. Every individual has the right to work in a professional atmosphere that promotes equal employment opportunities and where discriminatory practices, including harassment, are prohibited.

The Company requires each employee to treat all colleagues in a respectful manner and to forge working relationships that are uniformly free of bias, prejudice and harassment. The Company prohibits discrimination against or harassment of any team member on the basis of race, religion or religious creed (including religious dress and grooming practices), color, ethnic or national origin, sex (including pregnancy, childbirth, breastfeeding or related medical conditions), nationality, national origin, ancestry, immigration status or citizenship, age, physical or mental disability, medical condition (including genetic information or characteristics, or those of a family member), military service or veteran status, marital status or family care status, sexual orientation, family medical leave, gender (including gender identity, gender expression, transgender status or sexual stereotypes), political views or activity, status as a victim of domestic violence, sexual assault or stalking, or any other basis or classification protected by applicable federal, state or local law.

Any employee who is found to have discriminated against another employee is subject to discipline up to and including termination.

No individual will suffer any reprisals or retaliation for making complaints or reporting any incidents of discrimination or perceived discrimination, or for participating in any investigation of incidents of discrimination or perceived discrimination.

Insider Trading

Under federal and state securities laws, it is illegal to trade in the securities of a company while in possession of material non-public information about that company. Because employees will have knowledge of specific confidential information that is not disclosed outside the Company which will constitute material nonpublic information, trading in the Company's securities or in the securities of those companies with which the Company does business by employees or persons employees provide material nonpublic information to could constitute insider trading, violating the law. It is an employee's responsibility to comply with these laws and not to share material nonpublic information.

We have also adopted an Insider Trading Policy with which you must comply. For more information about insider trading laws, please reference our Insider Trading Policy, which can be found on the Company's internal website.

Improper Billing Practices

Babylon Workforce Members shall not engage in false, fraudulent, improper, or questionable billing practices. Such improper activities include, but are not limited to: billing for items or services that were not actually rendered, billing for or rendering items or services that were not medically necessary, submitting a claim for physician services when the services were actually rendered by a non-physician, or where a physician failed to provide the level of supervision required by applicable laws or regulations, submitting a claim for payment without adequate documentation to support the claim, signing a form for a physician without the physician's authorization, improperly altering medical records, prescribing medications and procedures without proper authorization, using a billing code that provides a higher payment rate than the correct billing code (i.e., "upcoding"), submitting bills in fragmented fashion to maximize reimbursement even though third-party payers require the procedures to be billed together (i.e., "unbundling"), or submitting more than one claim for the same service (i.e., "duplicate billing"). If Workforce Members have a question about the proper standard or procedure for documenting or submitting a claim, they should contact Compliance.

Ethical Research

Any academic research conducted by Babylon shall comply with all applicable laws, regulations and standards, and researchers' own professional codes of conduct. Babylon shall also ensure appropriate clinical investigation or clinical trial transparency in relation to research activities and results, including appropriate disclosure of information about research activities in external public registries and peer-reviewed journals.

Use/Development of Health Technology

Babylon shall comply with all applicable laws, regulations, and professional standards including the principles of the Association of British Health Industries (ABHI) and the US Centers for Disease Control and Prevention to ensure the safe and effective use of health technology, and appropriate collaboration as essential to the development and evolution of health technologies and related services.

Safeguarding

Safeguarding adults, children and young people is everyone's responsibility and Babylon is committed to protecting from harm all people who benefit from the work of Babylon including staff, volunteers, beneficiaries and other people who come into contact with us through our work. We have relevant policies and processes in place. Our colleagues will maintain the highest standards of conduct and are carefully selected to ensure they are suitable to carry out their roles. We have measures and controls in place that demonstrate our commitment to ensure that abuse and exploitation does not take place in the course of our work and we obey the laws of the countries where we work.

Patient Safety

All Babylonians have a responsibility to manage risk and implement reasonable and appropriate measures that fully support patient safety. Workforce Members must comply with applicable laws and regulations with respect to patient safety. In the event a patient safety or clinical safety incident does occur, the Workforce Member is responsible to report the incident timely and work with the all relevant teams such as but not limited to Clinical Safety, Clin Ops and Technology and others as necessary to immediately mitigate the effects of the issue and implement appropriate corrective action.

Privacy, Data Protection and Confidentiality

All Babylonians shall maintain the confidentiality of the personal data it collects, processes, creates, and maintains, as required by Babylon's data protection and privacy policies, contractual requirements, and applicable laws globally, such as the General Data Protection Regulation (GDPR) and the Health Insurance Portability and Accountability Act (HIPAA) and its accompanying regulations and formal guidance. All Babylonians must report privacy incidents or general privacy concerns to the Data Protection Office or appropriate local Privacy Officers. Babylon Workforce Members shall not access personal data unless they have a need to access the information and the access is justified, proportionate, necessary and consistent with their job duties.

To the extent feasible, consistent with existing policies, and allowed by law, Workforce Members shall maintain the confidentiality of communications and records containing confidential information concerning co-workers; communications and records relating to Babylon's confidential financial or business operations, trade secrets, credentialing or peer review actions; documents prepared in anticipation of litigation; and communications with legal counsel for Babylon. This section shall not be construed to

prohibit activity protected by the US National Labor Relations Act (NLRA) or other local regulation.

Information Security

All Babylonians are responsible for complying with Babylon's security policies in order to protect our patient and customer data, as well as ensuring the responsible and respectful use of Babylon's information and information systems and the intellectual property of others. Users are accountable for all actions made using their own access credentials and must not attempt to gain unauthorised access to systems or resources.

Computing equipment, information systems and data must always be used and handled in accordance with Babylon's Acceptable Use and Information Classification Policies.

Privileged users and management with additional responsibilities for the development of products, protection of systems and systems access are expected to exercise the utmost care and diligence at all times to ensure that security cannot be compromised.

All Babylonians have a responsibility to identify information security risks and implement reasonable and appropriate security measures. Workforce Members must comply with applicable laws and regulations with respect to computer use and the protection of personal data (including for clarity, health information). In the event a security incident does occur, the Workforce Member is responsible to report the incident timely and work with the Technology Compliance team and others as necessary to immediately mitigate the effects of the issue and implement appropriate corrective action.

Cooperation with Government Entities and Investigations

All Babylonians are expected to cooperate with any internal or external auditor and any government entity or investigation. Babylon depends on the cooperation of all Workforce Members when conducting internal audits or investigations or complying with government investigations and enquiries. Refusal to cooperate with an internal or external audit or investigation may result in disciplinary action up to and including termination. If you are approached by any government entity, please engage the appropriate internal contacts and stakeholders in the relevant regulatory and compliance functions.

Contracting Entities

All Babylonians shall ensure that vendors and other entities which contract with Babylon comply with this Code and the Vendor Code of Conduct provided to all suppliers contracted by Babylon, as well as cooperate with Babylon's compliance efforts. If a contract or arrangement with an outside entity implicates any of the compliance concerns discussed above, Workforce Members should refer the contract or matter to appropriate internal contacts and stakeholders (e.g., regulatory, compliance, privacy, legal, procurement, HR) for review. Nothing in this Code or in any Babylon policy and procedure shall be construed as an undertaking by Babylon to inspect, assume liability for or guarantee the performance of work or activities by independent contractors or other agents.

Your Responsibilities

Seeking Guidance

Employees are encouraged to seek guidance from supervisors, managers or other appropriate Company personnel when in doubt about the best course of action to take in a particular situation. In most instances, questions regarding this Code should be brought to the attention of the Compliance Officer.

If you have questions on, or need advice about this Code of Ethics and Conduct, ask your supervisor or email compliance@babylonhealth.com.

Reporting Suspected Violations

All Babylonians have a responsibility not only to comply with applicable laws, regulations, policies, and healthcare program or client contractual requirements; but also to immediately report suspected violations or compliance concerns to their manager, department leader, People team, or the Compliance and Risk team. If you have a concern, please raise it, even if it is the way things have always been done.

If an employee knows of or suspects a violation of this Code, or of applicable laws and regulations (including complaints or concerns about accounting, internal accounting controls or auditing matters), or an employee has concerns about a situation that they believe does not reflect the Company's culture and values, the employee must report it immediately to the Compliance Officer. An employee may also report concerns anonymously. See the Corporate Whistleblower Policy for more information about making anonymous reports.

If you do not believe that your concern is being adequately addressed, or you are not comfortable speaking with one of the above-noted contacts, then please report your report suspected violations or compliance concerns (confidentially and anonymously, if you wish) via the Company's confidential independent secure web portal at www.lighthouse-services.com/babylonhealth/ or reporting hotline 24 hours per day, seven days per week at:

- a. UK: Dial: +44 (0)-800-890-011, then dial: 800-603-2869
- b. US/Canada: Dial: 1-855-222-0816

All reports will be kept confidential, to the extent practical, except where disclosure is required to investigate a report or mandated by law. The Company does not permit retaliation of any kind for good faith reports of violations or possible violations.

All Babylonians are expected to report suspected violations through the internal reporting channels referenced in this Code and in Babylon policies rather than other channels (e.g., third parties, social media). Reporting violations internally allows Babylon to quickly and thoroughly address issues, and also helps identify opportunities to provide guidance on how the Code and our policies apply in specific situations.

If you have a concern, please raise it, even if it is the way things have always been done.

The failure to report a suspected violation of which the Workforce Member has information may subject the Workforce Member to discipline in accordance with Babylon's Disciplinary Policy.

Investigations

Reported violations will be promptly and thoroughly investigated. As a general matter, the Board will oversee investigations of potential violations by directors or executive officers, and the Compliance Officer will oversee investigations of potential violations by other employees. However, it is imperative that the person reporting the violation not conduct an investigation on their own. Employees are expected to cooperate fully with any appropriately authorized investigation, whether internal or external, into reported violations. Employees should never withhold, tamper with or fail to communicate relevant information in connection with an appropriately authorized investigation.

In addition, employees are expected to maintain and safeguard the confidentiality of an investigation to the extent possible, except as otherwise provided below or by

applicable law. Making false statements to or otherwise misleading internal or external auditors, investigators, legal counsel, Company representatives, regulators or other governmental entities may be grounds for immediate termination of employment or other relationship with the Company and also be a criminal act that can result in severe penalties.

Sanctions

Employees who violate this Code may be subject to disciplinary action, up to and including termination of employment. Moreover, employees who direct or approve of any conduct in violation of this Code, or who have knowledge of such conduct but do not immediately report it may also be subject to disciplinary action, up to and including termination of employment. A director who violates this Code or directs or approves conduct in violation of this Code shall be subject to action as determined by the Board.

Furthermore, violations of some provisions of this Code are illegal and may subject employees to civil and criminal liability.

Disclosure

Employees who violate this Code may be subject to disciplinary action, up to and including termination of employment. Moreover, employees who direct or approve of any conduct in violation of this Code, or who have knowledge of such conduct but do not immediately report it may also be subject to disciplinary action, up to and including termination of employment. A director who violates this Code or directs or approves conduct in violation of this Code shall be subject to action as determined by the Board. Nothing in this Code limits or prohibits employees from engaging for a lawful purpose in any "Protected Activity." "Protected Activity" means filing a charge or complaint, or otherwise communicating, cooperating or participating, with any state, federal or other governmental agency, including the Securities and Exchange Commission, the Equal Employment Opportunity Commission and the National Labor Relations Board. Notwithstanding any other policies in this Code (or elsewhere), employees are not required to obtain authorization from the Company prior to disclosing information to, or communicating with, such agencies, nor are employees obligated to advise the Company as to any such disclosures or communications. Notwithstanding, in making any such disclosures or communications, employees must take all reasonable precautions to prevent any unauthorized use or disclosure of any information that may constitute Company confidential information to any parties other than the relevant government agencies. "Protected Activity" does not include the

disclosure of any Company attorney-client privileged communications; any such disclosure, without the Company's written consent, violates Company policy.

Non-Retaliation

Babylonians shall not retaliate against any person for reporting suspected violations of this Code of Ethics and Conduct, the Compliance Program, Babylon policies, or laws, regulations, and client contractual requirements.

Waivers of this Code

Any amendment or waiver of any provision of this Code must be approved in writing by the Board or, if appropriate, its delegate(s), and promptly disclosed pursuant to applicable laws and regulations. Any waiver or modification of this Code for a director or the principal executive officer, principal financial officer, other executive officer, principal accounting officer, controller, or any other persons performing similar functions in the Company will be promptly publicly disclosed if and as required by applicable law, the rules and regulations of the Securities and Exchange Commission or the rules of the stock exchange on which the securities of the Company are listed.

Amendment

Babylon reserves the right to amend this Code at any time, for any reason, subject to applicable laws, rules and regulations.

Acknowledgment

All new employees must sign an acknowledgment form confirming that they have read this Code and that they understand and agree to comply with its provisions. Signed acknowledgment forms will be kept in employee personnel files. Failure to read this Code or to sign an acknowledgment form does not excuse any person from the terms of this Code.

Last Updated: October 21, 2021