



CODE OF CONDUCT

2025



CODE OF CONDUCT

The FOXO Technologies, Inc. Code of Conduct is applicable to all FOXO Technologies employees as well as all the employees of all FOXO Technologies subsidiaries. Therefore, when referring to FOXO Technologies' employees in this document it is inclusive of all FOXO Technologies' subsidiaries. The Code of Conduct was designed to serve several purposes, including:

1. To communicate FOXO Technologies' corporate values and commitment to compliance with laws, regulations, standards of care, ethical business practices, and the basic standards expected in the workplace; and
2. To ensure all FOXO Technologies employees are educated and understand their responsibility for staying in full compliance with applicable laws, regulations, ethical business practices, and the basic standards expected in the workplace, and to promote client adherence to applicable standards of care.
3. To promote full, fair, accurate and complete disclosure in reports by FOXO Technologies which are filed or submitted both internally and outside the organization to governmental or regulatory agencies.
4. To facilitate prompt internal reporting to Corporate Compliance regarding violations of this Code of Conduct, laws, and other corporate policy or procedure.

The FOXO Technologies Code of Conduct has the full endorsement of FOXO Technologies Shareholders, Board of Directors, and the management team. The Code of Conduct is meant to be comprehensive but is not intended to be the employee's only source for governance. To provide additional direction, FOXO Technologies has developed a comprehensive set of policies and procedures which are available for each employee's review on the company's website. Employees are expected to familiarize themselves with this document and are accountable for adherence to this Code of Conduct and all other corporate policies.

Who We Are

We are creating the next generation of healthcare.

FOXO Technologies, Inc., is a healthcare services and technology company. We currently operate three synergistic divisions - an epigenetics diagnostics and interpretation division, a rural hospital division and a mental and behavioral health division. Each division is operated by wholly owned subsidiaries.

Corporate Values & Ethics

- We act with integrity and honesty in the way we live both our personal and professional lives.
- We conduct our business with an unwavering commitment to the legal and ethical standards which govern our industry.
- We treat our fellow employees, clients, and patients with fairness and compassion.
- We accept responsibility for our actions and choices and their consequences.

Mission

Our mission is to build healthier communities by encompassing technology and expertise to offer a diverse and adaptable range of healthcare services and solutions to improve the quality of healthcare and lives for those we serve.

Our Values

We make healthcare accessible by adapting to the needs of our ever-growing community through collaboration and innovation.

CHIEF EXECUTIVE OFFICER AND THE CHIEF FINANCIAL OFFICER

FOXO Technologies' Chief Executive Officer's (CEO) and Chief Financial Officer's (CFO) activities are governed not only by the Code of Conduct and applicable state and federal law as mentioned above for all employees but are also governed further by the Sarbanes-Oxley Act of 2002, related Securities and Exchange Commission (SEC) rules and National Association of Securities Dealers Automated Quotations (NASDAQ) rules. Pursuant to these governances, FOXO Technologies is mandated to disclose if it has a written Code of Conduct for its CFO and CEO. The purpose of this Code of Conduct is to deter wrongdoing and promote ethical and honest conduct and provide guidance on how to remain compliant with industry standards and laws.

The CEO and CFO are bound by all aspects of this Code of Conduct and particularly those associated with ethical conduct, conflicts of interest, compliance with federal and state law, and the internal reporting of violations of this Code of Conduct or any other existing policy or procedure. The CEO and CFO are also required to file full, fair, accurate, timely and comprehensible disclosures in the required reports filed with the SEC and the NASDAQ. The implementation of internal financial controls which allow the company to record, process, and summarize and accurately report financial data is also the responsibility of the CEO and CFO. Not only shall these controls allow accurate reporting of financial data, but shall also provide for the detection of fraud by management or other employees who have an operational role in the organization's revenue cycle.

Any deficiencies discovered within the internal controls and disclosure processes of FOXO Technologies shall be reported to the Board of Directors (Board) and the NASDAQ as required. The CEO and the CFO and CFO's staff shall promptly bring to the attention of the Board and CCO information they have regarding deficiencies in the internal control process which are or might impact the corporation's ability to record, process, and report financial data. In addition, any fraud, whether or not substantial, discovered by the CEO or CFO involving management or anyone involved in the revenue cycle must be reported.

Any violations of this Code of Conduct, other corporate policies or procedures, or federal and state law by the CEO and CFO, will be evaluated for appropriate actions by the Board. In assessing the significance of the violation, the severity, frequency, and nature (intentional or inadvertent) of the violation will be considered. The Board will also consider if the person(s) responsible had been previously advised that their conduct was noncompliant and also if the individual(s) had other compliance violations in the past.

- (2) Seek input from employees on the development of policies and procedures and encourage frank and forward-thinking discussions in furtherance of positive healthcare treatment.
- (3) Periodically review individual policies and procedures with the goal of ensuring existing policies are consistent with current legal requirements and industry standards.
- (4) Be sensitive to the evolving compliance and operational needs of its employees, clients and potential clients, and other stakeholders, and not lose sight of the complex interrelation between clinical and regulatory standards.
- (5) Assess their direct reports capabilities, provide them with training opportunities and utilize them to the maximum extent possible to ensure their growth and the growth of the company.

OUR COMMITMENT TO STAKEHOLDERS

- **FOXO Technologies Employees:** FOXO Technologies is committed to treating all employees with respect, equality and dignity. FOXO Technologies recognizes employees as the foundation of the organization and therefore is committed to providing employees training and development opportunities to foster growth and career development. The Company is an equal opportunity employer and is committed to promoting a diverse workplace environment where individual differences are appreciated and respected. It is the Company's policy to recruit, hire, train, and promote employees regardless of their race, color, national origin, religion, gender, sexual orientation, disability, age, or any other basis protected by Federal or State law. In addition, the Company does not tolerate discrimination against employees based on any of these factors.
- **Regulators:** We have a strong ethical corporate culture which is committed to being compliant with the laws and regulations which govern our industry. Our compliance program is devoted to monitoring and auditing the company's adherence to all the applicable laws and policies and ensuring the appropriate actions are taken when allegations are substantiated.
- **Patients:** We are devoted to providing prompt and quality care to our patients.

- **Third Party Payers:** We are dedicated to being transparent with our third-party payers in a way which is consistent with our contractual obligations while demonstrating a mutual commitment to quality and cost-efficient healthcare.
- **Shareholders:** We are devoted to hiring qualified well-trained professionals to lead and manage our organization to ensure innovative and efficient medical solutions to our clients, which in turn will provide the best chance for favorable return on shareholders' investments.

POLICY STATEMENT OF ETHICAL PRACTICE

FOXO Technologies has a policy of maintaining the highest level of ethical and professional standards in its business operations, and it is critically important to preserve its reputation for high ethical standards, honesty, and integrity. This Policy Statement is a reaffirmation of the importance of these principles.

Ethical and professional business operations can only be achieved and sustained through the actions and conduct of all FOXO Technologies personnel. Each employee, including management employees, is obligated to conduct him or herself in a manner that upholds these standards. Such actions are important factors in evaluating an employee's judgment and competence, and an important element in the evaluation of an employee for salary increases, bonuses and promotion. Employees who ignore or disregard the principles of this Policy will be subject to appropriate disciplinary actions.

FOXO Technologies' operations include healthcare operations and/or services. Each employee who is materially involved in any of these areas as part of his or her employment with FOXO Technologies has an obligation to familiarize themselves with all such applicable federal and state laws and regulations, and to always adhere to the requirements thereof. Where any question or uncertainty regarding these laws or regulations exists, each employee has an obligation and responsibility to seek guidance. FOXO Technologies has a range of expertise within the organization from whom the employee may seek guidance to include the Compliance Officer, and numerous functional experts and responsible executives.

FOXO Technologies employees are encouraged to report suspected violations of laws, state and local regulations, company policies and procedures to their supervisor, member of management or the Corporate Compliance Hotline at 1-844-340-2469

Without limitation, this Policy prohibits FOXO Technologies and its employees from directly or indirectly engaging or participating in any of the following:

1. IMPROPER CLAIMS

Presenting or causing to be presented to the United States government, through any federal health care benefit plan, or any other health care payer, any claim that fits one of the descriptors listed below:

- A. **False Claims.** For a medical service knowing (or should have known) that the claim is false or fraudulent.
- B. **Service Not Provided as Claimed.** For a medical service that such person knows or should know was not provided as claimed, including a pattern or practice of presenting or causing to be presented a claim for an item or service that is based on a code that such person knows or should know will result in a greater payment to FOXO Technologies than the code such person knows or should know is applicable to the service actually provided.
- C. **Service by an Unlicensed Practitioner.** For a practitioner's service (or an item or service incident to it) when such person knows or should know the individual who furnished (or supervised the furnishing of) the service (1) was not a licensed physician; (2) was licensed as a physician, but such license had been obtained through misrepresentation of a material fact; or (3) represented to the patient at the time the service was furnished that the physician was certified in an area of medical specialty by a medical specialty board when the individual was not so certified.
- D. **Service by an Excluded Practitioner.** For a medical service furnished during a period in which such a person knows or should know the ordering practitioner was excluded from the health insurance program under which the claim was made.

Lacking in Medical Necessity. For a medical service that such person knows or should know is not medically necessary.

2. FALSE STATEMENT IN DETERMINING THE RIGHTS TO BENEFITS. Making, using, or causing to be made or used any false record, statement or representation of a material fact for use in determining the rights to any benefit or payment under any health care program.

3. CONSPIRACY TO DEFRAUD. Conspiring to defraud the United States government or any other health care payer by getting a false claim allowed or paid.

4. HEALTH CARE FRAUD/FALSE STATEMENTS. Executing or attempting to execute a scheme or artifice to defraud any health care benefit program or insurer.

5. ANTI-KICKBACK. Except as otherwise provided in 42 USC §1320a-7b(b) (the "Federal Anti-Kickback Law") and regulations promulgated thereunder, (1) knowingly and willfully soliciting or receiving any remuneration (including any kickback, bribe, or rebate) directly or indirectly, overtly or covertly, in cash or in kind (a) in return for referring an individual to a person for the furnishing or arranging for the furnishing of any item or service for which payment may be made in whole or in part under a Federal health care program; or (b) in return for purchasing, leasing, ordering, or arranging for or recommending purchasing, leasing, or ordering any good, facility, service or item for which payment may be made in whole or in part under a Federal health care program; or (2) offering or paying any remuneration (including any kickback, bribe, or rebate) directly or indirectly, overtly or covertly, in cash or in kind to any person to induce such person either: (a) to refer an individual to a person for the furnishing or arranging for the furnishing of any item or service for which payment may be made in whole or in part under a Federal health care program; or (b) to purchase, lease, order, or arrange for or recommend purchasing, leasing or ordering any good, facility, service or item for which payment may be made in whole or in part under a Federal health care program.

Simply stated, employees are prohibited from offering or paying anything of value (including but not limited to money) to induce the referral of business to FOXO Technologies. There are many exceptions to this law, and it is a complicated area. Employees are not expected to analyze or understand the nuances of this law. Instead, employees are expected to avoid the law's general prohibition and know when the circumstances suggest that there may be a concern in this area, in that event, the employee should bring the concern to the attention of the Compliance Officer for direct handling.

6. STARK LAW PROHIBITIONS. Presenting or causing to be presented a claim for reimbursement to Medicare or Medicaid or other entity for clinical laboratory services which were furnished pursuant to a referral by a physician or family member of a physician who has a prohibited financial relationship with FOXO Technologies, as that term is defined by Title 42 USC §1395nn (the "Stark Law"). Like the Federal Anti-Kickback Law, the Stark Law is implicated when a physician makes a referral to a clinical laboratory in which he or an immediate family member has an ownership interest or some type of financial or

compensation relationship. Again, the law has many exceptions and complexities. Employees are not expected to fully understand the law, but simply to comply with its general prohibition by avoiding offering inducements to physicians and their family members, and to report circumstances that suggest there may be a problem to the Compliance Officer.

7. ANTITRUST. Engaging in any activity, including without limitation being a member of a multi-provider network or other joint venture or affiliation, which is in restraint of trade or which monopolizes, or attempts to monopolize, any part of interstate trade or commerce.

8. FAILURE TO REPORT VIOLATIONS TO A COMPLIANCE OFFICER. Failing to promptly report to the Compliance Officer any instance described in the paragraphs above with respect to FOXO Technologies or any of its employees which is known to such a person.

9. HIPAA POLICY. Employees must comply with state and federal laws governing the confidentiality of certain patient information, including HIPAA, which regulates the use and disclosure of patient health information. All employees encounter personal health information at some time in their employment with the Company. HIPAA applies whether you work in the field or whether you work at a Company location or service center and provide billing services. Should you become aware of a breach in the confidentiality of personal health information, you must report it immediately to the Compliance Officer or the Compliance Department.

Federal and state laws also require that the Company maintain certain business and patient records for minimum periods of time. All employees are also required to comply with the Company's document retention policies and procedures. Personnel who engage in violations of the Anti-Kickback Statute, False Claims Act, or HIPAA will be treated according to company policies.

FOXO TECHNOLOGIES'S ETHICS/COMPLIANCE EMAIL & HOTLINE

All FOXO Technologies Personnel are encouraged to Report Suspected Violations. FOXO Technologies encourages its employees, management, officers, professional consultants, and practitioner clients to be proactive about compliance. FOXO Technologies has instituted a Compliance email address and an "Integrity Hotline" system for reporting suspected ethical and legal violations, or anything that may suggest the appearance of an impropriety in company operations and relationships with its clients, including most directly healthcare practitioners.

1 RIGHT TO REPORT

Each FOXO Technologies employee, manager, officer, client or professional consultant SHALL have the right to report suspected ethical or legal violations, or even the appearance of the same, to this hotline. REPORTS MAY BE MADE ANONYMOUSLY, if desired. The Compliance Office Staff will take all reasonable steps to preserve the confidentiality of those who give their names when reporting.

2 ACT OF REPORTING PROTECTED BY COMPANY POLICIES

FOXO Technologies will not tolerate retaliation against employees and professional staff who report suspected violations in good faith. Any person who attempts to retaliate will be subject to discipline, up to and including termination. Certain additional protections are provided by federal and state laws; See your employee handbook for more details.

3 COMPLIANCE HOTLINE DETAILS

1-844-340-2469

4 REPORTS TAKEN SERIOUSLY

FOXO Technologies takes all reports seriously. Questions? Contact Human Resources or the Compliance Officer.

AUDITING AND MONITORING

FOXO Technologies is committed to the use of auditing and monitoring to ensure the effectiveness and utility of its operations and Compliance Program.

FOXO Technologies' CFO will oversee an internal auditor responsible for conducting financial audits of areas of risk as identified by the CFO or CEO. Results of these audits will be shared with the Compensation Committee and Compliance. The CFO will also ensure external audits are conducted as required by the SEC and NASDAQ.

DOCUMENT MANAGEMENT

Every FOXO Technologies employee is accountable for the validity and accuracy of company records and documents. Company documents and records may not be altered or falsified and should never be destroyed to prevent access by government authorities. The definition of records is far reaching and includes, but is not limited to, computer files, medical bills, lab orders, lab results, computer files, disks, or other medium used to store data.

FOXO Technologies records shall be retained in accordance with the law and FOXO Technologies' Record and Retention Policy. The use of company records for personal gain is strictly prohibited and in some cases is contrary to law. The protection of both employee and patient personal information is paramount and such data, in any format, must be kept and stored in locked cabinets when not under the immediate control of the employee.

INFORMATION SECURITY

The integrity of our information security is paramount. All company provided mechanisms of communication, to include but not limited to phones, computers; electronic email accounts; and voice mail are primarily for business use only and remain the property of FOXO Technologies. Use of company electronic media to access pornographic, threatening, or illegal materials is strictly prohibited. Limited personal use of these devices is permitted as set forth in the Acceptable Use Policy. Ensuring the integrity of your electronic device and the content contained thereon are the responsibility of the employee. Employees should not leave their portable computer or their device unattended or unsecured without a password at any time. All office computers must be secured by a username and password. Employees are not permitted to share their login credentials with anyone or leave their login information in a location which could be exploited.

FOXO Technologies employees are prohibited from using any technique to penetrate or access the FOXO Technologies computer network or those of any other company. Any employee who abuses the company's communication system will be punished including the loss of company privileges, dismissal, or criminal prosecution.

Use of Artificial Intelligence

Artificial intelligence is defined as the theory and development of computer systems able to perform tasks that normally require human intelligence such as visual perception, speech recognition, decision-

making, and translation between languages. The rapidly expanding use of AI in health care can enhance various aspects of healthcare delivery, including, improve and predict patient/clinical outcomes, improve assessment and screening for appropriate care, personalized treatment, improve patient engagement, streamline administrative tasks and ease the burden of clinical documentation. FOXO is committed to ensuring that AI is utilized in safe, legal, ethical and effective ways that comply with our policies.

Guidelines for responsible use of FOXO Technologies:

- Be aware of the potential risks across lines of business to guard against over-or under-utilization of resources or services, data breaches, inattention based on over-reliance on automation and/or predictive technology. Ask questions if you do not understand an AI-generated recommendation or output. Clinical as well as non-clinical uses of AI should follow these general guidelines.
- Remember that AI is an assistive tool that augments human clinical decision-making capabilities but does not replace them. The clinician and clinical team remain in control of health-care decisions, the plan of care and other clinically driven care decisions.
- Although AI technology may perform, automate or expedite specific tasks, it remains the responsibility of the clinician and clinical team to ensure that the tasks are carried out and documented appropriately.
- Clinicians are responsible for ensuring the accuracy of documentation and the clinical record and should not include any AI-generated text in the record or sign off on changes to the record without reviewing for accuracy.
- New uses of AI technologies must go through existing approval channels and/or vendor deployment, ensuring quality testing and review by Information Security, Compliance and other stakeholders.

USE OF COMPANY PROPERTY

All company property provided to the employee to include communication systems (computers, email, intranet access, and phones) are the property of the organization. The use of company property is primarily for business purposes. Limited personal use of electronic systems is permissible, as further described in the Acceptable Use Policy, but the employee must understand these communications are not private. When using a company issued electronic device employees have no expectation of privacy, and the organization reserves the right to monitor and access these communications pursuant to company policy.

CONFIDENTIALITY/NON-DISCLOSURE

Employees are prohibited from sharing Confidential Information regarding the company either during or after their employment with the company. Confidential Information means any information about the company, or any of its customers, clients, suppliers, or vendors in any form, however and whenever acquired, that is not generally known to business competitors or the general public. Confidential Information includes without limitation:

- Confidential, secret, and/or proprietary knowledge, data, or information;
- Any "trade secret," as that term is defined by the Florida Uniform Trade Secrets Act ("FUTSA"), § 688.000, et seq., or as defined by any other state or federal law governing trade secrets, including the Uniform Trade Secrets Act;
- Inventions, ideas, products, processes, formulas, patterns, compilations, devices, methods, techniques, processes, data, research, programs, know-how, improvements, discoveries, computer programs, source codes, and database structures;
- Business methods, operations, plans, projects, finances, prices and costs, sales and shipping information/techniques, market studies, competitive analyses, accounts receivable or payable, billing methods, pricing policies, and other non-public financial information;
- Information concerning internal affairs, memoranda, policies, legal affairs, and security methods; and
- Customer, client, vendor, and supplier names and addresses, lists, financial information, data, purchasing and supply histories.

By signing the Code of Conduct Employee Certification, the employee agrees all Confidential Information is and shall remain the Company's property and the employee will not remove any Confidential Information from Company premises. Additionally, any intellectual property, including patent, copyright and trademark rights, that are created by employees, within the scope of employment during the period of employment with the Company, are irrevocably assigned to the company.

INSIDER TRADING AND INFORMATION

As an Employee of FOXO Technologies, you may become aware of company restricted information which is not available to the public which would be relevant to an investor or any outside third party to buy or sell the organization's securities. Company restricted information (non-public information) may include but not be limited to marketing plans, financial results, merger plans or other business decisions without limitation. Employees are strictly prohibited from releasing this information to any outsider or using this information to support their own buying or selling of the organization's securities. Doing so is contrary to law and serves to degrade the general public's ability to have complete and timely information on which to base their investment decisions.

MARKETING AND ADVERTISING

Marketing and advertising are important elements to the success of our organization. The medical environment is extremely competitive and one which requires the highest standards and level of integrity. When marketing our products it is critical we follow state and federal antitrust laws and only communicate truthful informative information regarding the capabilities of our products and services. The use of inflated and deceptive information regarding the abilities and quality of our products and services is strictly prohibited. It is appropriate to compare and contrast our pricing and services with our competitors, but it is not appropriate to maliciously malign other persons or business for either your personal gain or the gain of the company. Marketing practices often create concerns under state and federal anti-kickback and physician referral laws. Employees should consult with the Compliance Officer any time these concerns become a possibility.

FOREIGN CORRUPT PRACTICES ACT

FOXO Technologies may become a global company as it may have workers and services located outside of the United States. These dynamic places additional requirements of the Foreign Corrupt Practices Act (FCPA) on the corporation. Simply stated, the FCPA disallows the payment of bribes to foreign officials to secure or maintain a contract. These bribes are not necessarily restricted to a direct payment of currency but can include other inducements or favors. The FCPA is applicable to publicly traded companies and their officers and extends to prohibited conduct anywhere in the world. The SEC, in collaboration with the Department of Justice, are responsible

for enforcement of the FCPA.

RECEIVING GIFTS

A gift is described as, but not limited to, a favor, gratuity, gift certificate, tickets to a sporting or social event, cash, or other item having a monetary value. The acceptance of sporting events or social event tickets from an outside source or business associates, including potential referral sources, should be minimal (infrequent) to limit the appearance of impropriety. Specifically, employees may accept such invitations when the total cost is less than \$392.00. The employee shall not accept free lodging or transportation from an outside source no matter the cost.

FOXO Technologies employees may accept a gift(s) from an individual with whom FOXO Technologies has a business relationship, but the value or aggregate value cannot be greater than \$392.00 in any given year. The reception of such gifts must be reported to compliance in writing within 5 business days of reception. The fair market value of the item will be assessed and recorded to ensure adherence to this requirement.

PROVIDING GIFTS

FOXO Technologies employees may wish to extend an invitation to a business associate or client (referral source) to attend a sporting event, social event, meal, reception, etc. These events are permissible with certain limitations:

- Business must be discussed
- The gift must not be solicited by the person receiving the gift.
- These events must be infrequent.
- Travel and lodging costs must not be provided.
- The cost of the one event or aggregate of all events may not exceed \$392.00 in any given year.

Employees are strictly prohibited from providing cash or a cash equivalent to a business associate or client. Employees are required to report all such expenditures to finance. The clients provided the gift must be identified and the amount spent must be reported to ensure adherence to the \$392.00 limit.

BUSINESS EVENTS

FOXO Technologies may host or sponsor an event for legitimate business purposes provided they are reasonable and prudent. Meals are permitted to be offered during these events.

INTERNAL INVESTIGATIONS

FOXO Technologies is committed to investigating all reported compliance concerns, to include without limitation violation of this Code of Conduct and violations of FOXO Technologies policies, swiftly and confidentially if the circumstances allow. The Compliance Officer will coordinate and oversee all internal investigations. Following the conclusion of all corporate led investigations, the Compliance Officer will review the findings with corporate's internal counsel and the CEO. The Compliance Officer will then recommend the necessary corrective action or changes to the Board for approval.

Remediation

When an investigation validates a reported compliance concern it is the policy of FOXO Technologies to initiate curative action to include making reimbursements of overpayments when applicable, notifying

the necessary government agency, imposing the necessary internal disciplinary action if appropriate, and instituting process changes to prevent a repeated incident.

Employee Obligations & Performance Assessment

Our Compliance Policy imposes several obligations on FOXO Technologies employees, all of which will be enforced by the standard disciplinary measures available to FOXO Technologies as an employer. Adherence to the Compliance Program will be considered in personnel evaluations. FOXO Technologies places a premium on compliance with the spirit and specific provisions of its Compliance Program.

- A. Obligations – Each employee has personal responsibility for reporting any activity which is a violation of this Code of Conduct, company policy and procedure, accreditation standards, medical standards, or applicable local and federal laws.
- B. Assessment of Employee Performance under Compliance Program – Employees will be evaluated by their supervisors on their individual job performance but will also be assessed on their allegiance to the policy and procedures as well as the legislation which governs their operational environment.
- C. Discipline – All violators of FOXO Technologies' Code of Conduct will face disciplinary action. The imposition of discipline will vary and will be contingent on the type, severity and frequency of the violation and could result in any or all of the following:
 - Oral reprimand
 - Written reprimand
 - Probation
 - Suspension
 - Termination

MANAGEMENT TEAM

As indicated, this Code of Conduct is required to be followed by all FOXO Technologies employees regardless of their status within the company. The management team is viewed by the company as the leaders of the organization and as such should set an example and tone for their employees. Accordingly, leaders are expected to ensure their team has the necessary information and training to be compliant with internal policy and procedure, industry standards, and state and federal law. Leaders must also work to instill the FOXO Technologies' ethical standards and values in their employees by maintaining an open dialog with their personnel so they will be willing to share concerns when they arise.

FOXO Technologies relies on its management team to:

- (1) Exercise care and common sense when drafting policies making it a point to create well-balanced policies that are not overly or under-restrictive and are easily understood.