

## **EHEALTH, INC.**

### **VENDOR CODE OF CONDUCT**

**Adopted on June 8, 2021**

eHealth, Inc. and its subsidiaries (collectively, “eHealth”) are committed to conducting their business in an ethical, legal, and socially responsible manner. eHealth seeks suppliers (as defined below) with a shared commitment to our business standards and values and expects suppliers to comply with the principles in this Vendor Code of Conduct (“Code”), which identifies minimum requirements for establishing and maintaining a supplier relationship with us.

This Code applies to suppliers of goods and services, and their employees, in their work with eHealth. The group referred to herein as “vendors” includes suppliers, subcontractors, service providers, professional service providers, consultants, intermediaries and agents.

eHealth’s commitment to integrity extends to our vendors. This commitment includes providing opportunities for a diverse vendor base that reflects our customers, associates and communities we serve, along with our values. eHealth expects all vendors, regardless of location, to adhere to the principles in this Code when performing services for, or related to, eHealth. eHealth expects its vendors to operate according to the highest ethical and legal principles. Vendors shall treat all workers with dignity and respect. Vendors must not subject workers to, or threaten to subject workers to, harsh and inhumane treatment, including but not limited to corporal punishment, mental or physical coercion or verbal abuse, sexual harassment or sexual abuse. Disciplinary policies and procedures related to this requirement shall be clearly communicated to workers.

- Vendors will not engage in, or support the use of, child labor, and suppliers shall comply with all applicable local child labor laws and employ only workers who meet the applicable minimum legal age requirement for their location.
- Vendors will not utilize or source products or services from entities associated with forced, bonded, indentured, involuntary or exploitative prison, trafficked or slave labor. Involuntary labor includes transporting, harboring, recruiting, transferring, receiving or employing persons by means of threat, force, coercion, abduction or fraud for labor or services. All work must be voluntary and workers shall be free to terminate their employment at any time.
- Vendors who provide residential facilities for their employees must also provide safe and healthy facilities. Vendor-provided facilities must meet the host country housing and safety standards. There shall be no unreasonable restrictions on entering, exiting or movement within company-provided facilities. Vendors will take reasonable efforts to ensure that their own suppliers comply with this requirement.
- Vendors must comply with all applicable wage and hour laws, including those relating to minimum wage, overtime hours, and other elements of compensation, and must provide all legally mandated benefits. Vendors will not require employees to work more than the maximum number of hours permitted under applicable laws.

- Vendors must respect workers' rights to freedom of association in compliance with existing local laws and without discrimination, intimidation or harassment as well as respect the right of workers to refrain from such activities. Workers and/or their representatives shall be able to openly communicate and share ideas and good faith concerns with management regarding working conditions and management practices without fear of discrimination, intimidation or harassment.
- Vendors must treat their employees with respect and dignity and to refrain from any unlawful harassment and discrimination. Vendors will not discriminate against any person because of their race, color, gender, religion, ethnicity or national origin, caste, age, disability or other medical condition, sexual orientation, gender identity, genetic information, pregnancy, marital status, veteran status, political affiliation, union membership or any other basis protected by applicable national or local law.
- Vendors should strive to minimize their environmental impact and promote health and safety in conducting their business. Vendors must comply with all applicable environmental, health and safety laws and regulations, provide workers with a safe and healthy work environment, and implement corrective actions to eliminate causes of injury. Vendors should reduce their impact on the environment through the conservation of natural resources, minimization of emissions and waste, responsible chemicals management and other practices.
- Vendors should work against corruption in all its forms and are prohibited from engaging in corruption, extortion or embezzlement. Vendors must comply with all applicable anti-corruption laws and regulations of the countries in which they operate such as the U.S. Foreign Corrupt Practices Act, and as applicable, the UK Anti-Bribery Act, the OECD Anti-Bribery Convention and any other international anti-corruption conventions. Vendors will not offer or accept bribes or employ other means to obtain an undue or improper advantage. Bribes, kickbacks, facilitating payments and similar payments to government officials or to eHealth employees or agents acting on eHealth's behalf are prohibited. eHealth employees may not accept gifts of more than nominal value or lavish entertainment from suppliers. When business meals and entertainment are appropriate to further a legitimate business purpose, those expenses may not be extravagant in nature.
- Vendors must respect and refrain from infringing upon the intellectual property rights of others, including patents, trademarks, copyrights and other proprietary rights.
- Vendors are expected to deal fairly with eHealth employees as well as their other business partners and should not take unfair advantage through manipulation, concealment, abuse, misrepresentation of material facts or any other unfair dealing. Vendors will not engage in collusive bidding, price fixing, price discrimination or other unfair trade practices in violation of applicable antitrust and competition laws. Vendors will uphold fair business standards in advertising, sales and competition.
- Vendors must protect the Confidential Information entrusted to them by eHealth, its affiliates, customers or suppliers. Confidential Information may only be used and disclosed in a manner authorized by eHealth. Confidential Information includes any business information of eHealth, its customers or suppliers that is not generally known to the public.

Vendors using subcontractors to provide goods and services to eHealth will also be responsible for subcontractor observance of the principles in this Code. eHealth reserves the right to monitor vendor compliance with this Code through vendor surveys and certifications as well as other means that eHealth deems appropriate. If a vendor is found in violation of this Code, eHealth will require the vendor to take prompt, remedial measures to address the violation, including instituting action plans to ensure compliance with this Code.