LifeStance HEALTH

Code of Conduct



LifeStance HEALTH

To Our Teammates:

LifeStance is committed to operating in an ethical manner, in compliance with the laws and regulations that apply to our business, and with a compassionate approach to health care delivery. We have established a Corporate Compliance Program for LifeStance Health Group, Inc. and its affiliates and subsidiaries ("LifeStance" or "Company") that reflects this commitment and the core values we share that guide our conduct at the Company.

This Code of Conduct ("Code" or "Code of Conduct") formalizes LifeStance's ethical standards and serves as a cornerstone of our Corporate Compliance Program. It applies to all full and part-time employees, board members, contractors, volunteers/students, vendors, and agents (jointly referred herein as "Teammates"), establishing clear expectations for professional conduct across our organization. It is being provided to you because you are essential to building and supporting an organization that demonstrates integrity, ethics, compassionate care and best practices. We expect that each Teammate will behave in a manner that reflects a high level of integrity and will assume responsibility for encouraging other Teammates to act in the same manner. This Code provides guidance on the standards that the Company has adopted, and most importantly, communicates our expectation that all Teammates will adhere to these standards. Within this Code, you will find information regarding our nonretaliation policy and your responsibility to report any situation that you believe may violate our Code of Conduct. Every Teammate should review the Code of Conduct on an annual basis.

At the Company, the Corporate Compliance Officer and the Compliance Committee assist the Company's Board of Directors with its oversight responsibly for compliance. If you have any questions regarding the Corporate Compliance Program or the Code of Conduct, or you encounter any situation that you believe violates the law or our Code of Conduct, you should immediately consult your supervisor, department leadership, and/or the Compliance Officer. You have our personal assurances that there will be no retribution for asking questions or for good faith reporting of possible improper conduct.

Please review, and become familiar with, the contents of this Code of Conduct. We recognize that no Code of Conduct can be a substitute for our own internal sense of fairness, honesty and integrity. However, this Code is our attempt to address the complex legal and business ethical issues we face every day and to provide guidance and overall principles for our health care business.

In closing, the future of the Company depends on not only the skills, abilities and commitment of all Teammates, but also on our continued good judgment, self-discipline, common sense and integrity. We thank you for your contribution in making the Company an organization that demonstrates the ethics and values to which we are committed.

LifeStance Health Group, Inc.

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Introduction

Purpose of the Code of Conduct

As valued LifeStance Health (“LifeStance” and/or “Company”) full and part-time employees, board members, contractors, volunteers/students, vendors, and agents (jointly referred herein as “Teammates”), your commitment to compliant, ethical and professional conduct is central to delivering on our mission. This collective, unwavering dedication to doing the right thing protects our organization's reputation, enabling us to help people lead healthier, more fulfilling lives by improving access to trusted, affordable, and personalized mental healthcare.

Our Code of Conduct outlines the core responsibilities each of us has in creating and maintaining a compliant and ethical culture. It centers on our mission and serves as a framework to help us create and preserve trust by making ethical decisions. We must act, think, and talk about ethics and compliance on an ongoing basis, as building a culture of integrity and ethics requires consistent investment.

This Code of Conduct applies to all Teammates of LifeStance. The terms set forth in this Code of Conduct do not consitute an employment contract, and do not create any express or implied contractual rights.

This Code of Conduct shall serve as a guide for all Teammates conducting business on behalf of LifeStance. Reading, understanding, and following the Code of Conduct is everyone’s responsibility. One of our most vital responsibilities is to stay curious and courageous—to ask questions and raise concerns when something doesn’t seem right. Your voice is essential. By speaking up, you help safeguard the trust our patients, Teammates, partners, and communities place in LifeStance, ensuring we uphold the highest standards of integrity and care.

Teammate Expectations

- Read, understand and follow the Code of Conduct and the Company's compliance policies and procedures.
- Seek guidance when questions arise.
- Avoid unethical, non-compliant, or otherwise improper behavior.
- Report any known or suspected compliance violation. If you see something, you have an obligation to say something.
- Assist and support with compliance inquiries, audits and investigations.
- Be responsible and accountable for your conduct and practices.

LifeStance is committed to doing the right thing and being in full compliance with all federal and state health care program requirements. LifeStance may sanction or discipline any Teammate who fails to act in accordance with our Company policies and procedures, applicable laws and regulations, or this Code of Conduct.

This Code of Conduct is a key part of LifeStance's Corporate Compliance Program ("Compliance Program"). It reflects the core values and principles that guide LifeStance operations. The purpose and objective of the Code is to:

- Establish a code of conduct, setting forth the ethical standards to be followed by all Teammates;
- Communicate to all Teammates the standards they are expected to follow;
- Communicate to Teammates the ethical standards we have adopted;
- Communicate methods of reporting issues and concerns in order to prevent, detect and correct activities that are not consistent with the ethical standards LifeStance has adopted; and
- Document LifeStance's commitment to the highest professional standards.

The Code of Conduct is the cornerstone of our anti-fraud and abuse initiatives, designed to prevent, identify and correct potential occurrences of non-compliance or unethical activities.



Mission, Vision, and Values

Mission

The mission of LifeStance is to help people lead healthier, more fulfilling lives by improving access to trusted, affordable, and personalized mental healthcare.

All activities carried out on behalf of LifeStance by its Teammates will be in compliance with all applicable laws, rules and regulations and conducted according to the highest ethical and moral standards. We are committed to maintaining high standards of clinical and service excellence with the utmost integrity.

Vision

The name of the Company, LifeStance, has a direct connection to our mission and values. LifeStance signifies a person's relationship with what they accept as being of ultimate importance. It involves the presuppositions and theories upon which a stance could be made, a belief system and a commitment to working it out in your life. We value:

- **Delivering Compassion:** We care for people unconditionally and act with empathy always.
- **Building Relationships:** We are collaborative, building enduring relationships to achieve more together.
- **Celebrating Difference:** We respect the diversity of every individual's lived experiences.

Values

- **Belonging:** We foster an inclusive environment where every voice is valued, and everyone feels seen, respected, and empowered to thrive.
- **Courage:** We act with bravery—challenging the status quo, advocating for what's right, and embracing growth even when it's hard.
- **Empathy:** We meet every person with deep compassion, listening with our hearts to understand their unique needs and experiences.
- **One Team:** We rise together, breaking down barriers and collaborating with trust to deliver exceptional care and outcomes.

Code applies to all Teammates

LifeStance's Code of Conduct must be followed by all Teammates. We expect our Teammates to follow the highest ethical standards related to Company business and to report any suspected violation of the Code of Conduct. Failure to comply is a serious matter that may lead to disciplinary action up to and including termination. In addition, Teammates who violate a specific law may also be subject to legal prosecution.

Fundamental Principles

We are committed to fostering an inclusive, respectful, and collaborative environment. All members are expected to uphold the following core principles:

- Respect – Treat everyone with dignity, kindness, and empathy.
- Integrity – Act honestly, ethically, and with accountability.
- Inclusivity – Embrace diversity, promote belonging and equitable participation.
- Collaboration – Encourage open communication and constructive feedback.
- Responsibility – Prioritize safety, privacy, and the well-being of others.

Harassment, discrimination, retaliation, or any form of harmful behavior will not be tolerated. By participating, you agree to abide by these principles and contribute to a positive community.

Communication of the Code

This Code of Conduct applies to all Teammates. It is each individual's responsibility to read, understand, and adhere to these principles. LifeStance reserves the right to modify this Code of Conduct periodically to reflect evolving best practices, operational needs, and regulatory requirements. Such updates may occur without prior notice to Teammates. The most current version will always be available on the Company intranet ("Compass") for reference at any time. All Teammates are responsible for regularly reviewing the Code to ensure ongoing compliance with its provisions. Violations should be reported. Leadership is committed to enforcing these standards fairly and transparently.

To ensure ongoing compliance with legal and regulatory requirements, updates to this Code may be made without prior notice. All changes will be reflected on Compass upon implementation. Failure to adhere to these standards may result in disciplinary action, up to and including termination.

Our Fundamental Commitment to Patients

Quality of Care and Patient Safety

LifeStance is committed to providing consistently high-quality patient care services without regard to race, color, national origin, age, religion, disability, sex (including pregnancy, sexual orientation, gender identity, and sex characteristics). To avoid compromising the quality of care, clinical decisions (including tests, treatments and other interventions) are based on identified patient healthcare needs, not on financial circumstances.

It is our goal to provide high-quality healthcare services to our patients with skill, concern, and compassion. LifeStance offers a broad range of clinical services that are evidence-based and compassionately provided to ensure patient safety, superior clinical outcomes and the highest levels of satisfaction with a patient and family-centered focus.

Patient Rights

At LifeStance, we recognize that we are nothing without our patients. As such, we are dedicated to upholding and protecting every patient's rights. We provide compassionate, individualized care grounded in transparent communication about treatments and expectations. Patient privacy must at all times be safeguarded with the highest standards of confidentiality. Clinicians are expected to deliver evidence-based care that prioritizes patient well-being and safety. These principles, along with patient responsibilities, are detailed in our Patients' Rights and Responsibilities guidelines found here: LifeStance Patients' Rights and Responsibilities.

Patient Information Confidentiality

At LifeStance, we recognize that protecting our patients' sensitive health information is both a legal obligation and a sacred trust. We rigorously safeguard all protected health information (PHI), any personally identifiable information (PII), substance use and reproductive health records in strict compliance with HIPAA, its amendments, and all other applicable privacy and security laws. Every team member is accountable for upholding these standards through secure practices, continuous training, and a culture of respect for patient privacy—ensuring confidentiality remains at the heart of every interaction.

Patient Commitments

We honor our commitments to every patient by delivering on promises, respecting their time, and providing transparent communication about their care. We uphold these pledges through accountability, follow-through, and a dedication to ethical practices that prioritize patient well-being above all else.

Patient-Centered Care

We place patients at the heart of everything we do. Their unique needs, preferences, and goals guide our clinical decisions, ensuring compassionate, individualized care. Through active listening, shared decision-making, and cultural humility, we empower patients as partners in their treatment journey.

Accurate and timely record keeping

At LifeStance, all Teammates are responsible for maintaining complete, accurate, and timely patient records to ensure seamless continuity of care. Documentation must be factual, objective, and compliant with all applicable legal and regulatory requirements. Records must be updated promptly and securely to reflect patient interactions, treatments, and outcomes while rigorously protecting confidential health information. Falsification, omission, or delayed documentation is strictly prohibited and may result in disciplinary action. By upholding these standards, we preserve the integrity of patient care and meet our professional and ethical obligations.

Accurate and Timely Charge Entries

Charge entry serves as the foundation for billing integrity and must reflect only services actually rendered, as documented in the patient's medical record. Charges must be entered upon services rendered, rather than upon services ordered. Charges must also be entered within reasonable time frames as set forth in the Company's policies and procedures, see Timely Documentation Policy located on the Compass. All charges must be:

- Accurate: Precisely matching services provided and properly documented,
- Timely: Submitted within established timeframes to ensure compliance, and
- Valid: Based solely on performed services, not merely ordered procedures

LifeStance prohibits any form of misrepresentation, upcoding, or unbundling of charges. All Teammates involved in the billing process are responsible for maintaining these standards to uphold regulatory compliance and ethical billing practices.

Our Compliance Program

Our organization maintains a robust Compliance Program overseen by the Chief Compliance Officer and Compliance Team. All Teammates must adhere to our Policies and Procedures, Compliance Program Manual, and this Code of Conduct, which form the foundation of our ethical and compliant operations.

Chief Compliance Officer and the Compliance Team

Compliance Teammates administer the Compliance Program on a day-to-day basis and are always available to answer compliance-related questions, address concerns, and investigation reports. The Chief Compliance Officer provides oversight to the Compliance Program and Team, and they directly report to the Clinical Quality and Compliance Committee of the Board of Directors and the Chief Executive Officer (CEO).

Policies and Procedures and the Code of Conduct

LifeStance has established comprehensive policies and procedures, Compliance Program Manual, and this Code of Conduct to provide clear guidance for all Teammates located on the LifeStance Compass. The Compliance Department maintains these standards to ensure ethical business practices and regulatory adherence. While compliance policies address specific operational and clinical requirements, this Code of Conduct outlines our foundational principles for professional behavior. Together, these documents define expectations, promote accountability, and support our commitment to lawful and ethical operations. All Teammates are responsible for understanding and following these guidelines as part of their daily responsibilities.

Compliance Training

LifeStance mandates all new and existing Teammates to complete annual compliance training to ensure understanding of and adherence to regulatory requirements and organizational policies. These trainings cover essential topics including fraud, waste and abuse, privacy and security awareness, workplace conduct, and safety standards. Participation is compulsory for all Teammates, with completion records maintained to verify compliance. As a cornerstone of our Compliance Program, this training reinforces our shared commitment to ethical operations and regulatory adherence. Failure to complete required training may result in disciplinary action, up to and including termination.

Communicating Issues and Reporting Compliance Concerns

Unless otherwise outlined herein this Code, Teammates are encouraged to first discuss concerns with their direct supervisor or their department leadership, who is best positioned to address and resolve issues. If a concern is not adequately addressed or if the supervisor or department leadership is unable to provide a resolution, employees may escalate the matter to the next level of management. All supervisors, managers, and department leadership at LifeStance have an obligation to listen to concerns and take appropriate action.

If the issue remains unresolved or if a Teammate is uncomfortable discussing it with their supervisor, manager, or department leadership, they must make a Compliance Report as outlined below.

Obligation to Report

All LifeStance Teammates have an affirmative duty to immediately report any known or suspected compliance and regulatory violations of laws, regulations, company policies, or this Code of Conduct or ethical concerns. Reports must be made through proper channels, including:

- Your direct supervisor or department leadership
- The Compliance Hotline (1-800-308-0994)
  - Teammate Safety and Security Hotline, option #1
  - Employee Relations Hotline, option #2
  - Legal & Compliance Hotline, option #6
- Compliance@LifeStance.com
- ComplianceDesk

LifeStance encourages and values self-reporting of potential violations, which may be taken into account when determining appropriate corrective measures. However, self-reporting does not automatically absolve individuals from accountability for misconduct. Failure to report known violations constitutes a violation of this Code of Conduct and may result in disciplinary action, up to and including termination. Protecting LifeStance's integrity and maintaining our ethical standards is a shared responsibility that requires vigilance from every Teammate.

Confidential Compliance Hotline

LifeStance maintains a confidential Compliance Hotline (Toll-Free 1-800-308-0994 ext 6) to empower Teammates and stakeholders to report suspected violations of laws, policies, or ethical standards. Reports may be submitted anonymously where legally permitted, and all concerns undergo prompt, thorough investigation. This protected channel ensures safe reporting without fear of retaliation. Reports must be made in good faith—false claims or malicious allegations violate our Code of Conduct.

Non-Retaliation

All LifeStance team members are expected and encouraged to report compliance concerns in good faith. LifeStance strictly prohibits retaliation against any individual anyone who, in good faith, reports concerns, participates in an investigation, raises questions about potential misconduct, or participates in an investigation. LifeStance maintains confidentiality to the fullest extent permitted by law for all reports and protects the anonymity of reporters when possible.

Retaliation is a serious violation of policy and will result in disciplinary action. Teammates who believe they have experienced retaliation should contact the Compliance Team immediately.

Internal Investigations

LifeStance is committed to conducting prompt, thorough, and impartial investigations into all reported concerns. Confidentiality is maintained to the greatest extent possible, consistent with the need to conduct a fair and effective investigation. All investigations are approached objectively without presumption of outcomes. All team members are required to fully cooperate, including providing requested information and documentation. Failure to cooperate or attempts to interfere with an investigation may result in disciplinary action. Corrective actions resulting from an investigation are based on the findings and aligned with LifeStance's policies and values.

Responding to External Investigations

LifeStance maintains a policy of full cooperation with all lawful government inquiries, audits, and investigations. We prohibit any interference with or obstruction of such proceedings. When interacting with government officials responsible for administering or enforcing the law, we are committed to providing complete, accurate, and transparent information in accordance with legal requirements.

If contacted by a government or regulatory agency as part of an external investigation, Teammates must notify the Compliance Team immediately by submitting a ComplianceDesk ticket or emailing Compliance@LifeStance.com and follow Company protocols. No information should be disclosed without prior authorization. The Compliance Team will coordinate responses to ensure legal and regulatory obligations are met.

Disciplinary Action for Violations of the Code of Conduct

Teammates who are found to have violated any of the standards contained in this Code of Conduct may be subject to disciplinary action. The appropriate LifeStance leaders will work in collaboration with Human Resources to take appropriate disciplinary action based on the nature and severity of the violation. All disciplinary actions are taken on a fair and equitable basis

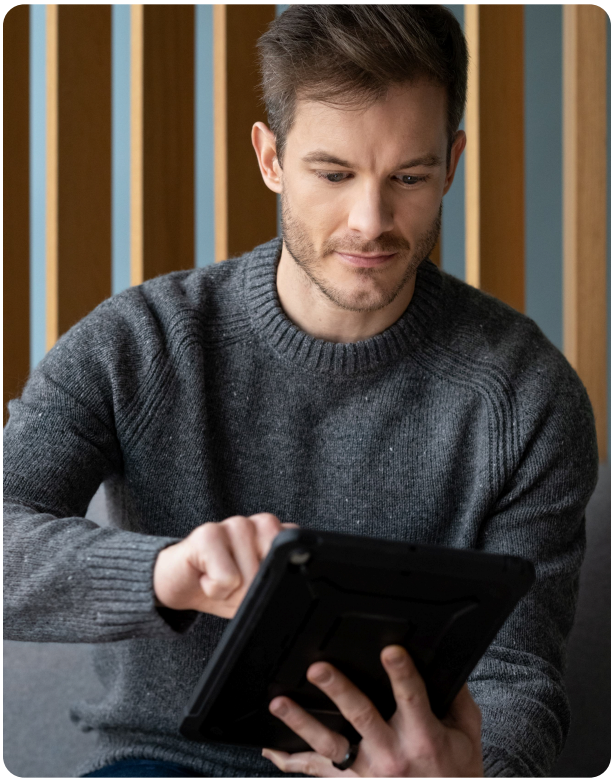
Amendments and Waivers to the Code of Conduct

LifeStance maintains strict adherence to its Code of Conduct and rarely grants exceptions to its provisions. Waivers may only be considered under extraordinary circumstances and require formal approval through established governance channels.

For non-executive employees, waiver requests must receive joint approval from both the Chief Compliance Officer or Chief Legal Officer and the Chief Executive Officer. In the case of directors or executive officers, the Board of Directors must approve any waiver, with such approvals being publicly disclosed as mandated by applicable securities laws and stock exchange requirements.

All waiver inquiries should be directed to either the Chief Compliance Officer or Chief Legal Officer for evaluation. This rigorous approval process ensures consistent application of our ethical standards across the organization while maintaining compliance with regulatory obligations.

Compliance and Obeying Laws and Regulations



It is the policy of LifeStance to fully comply with all applicable federal and state laws, regulations, standards and other compliance requirements at all levels of government and within the various professions employed by the health system. Our ethical standards are built upon this principle. We will not pursue any business opportunity that requires unethical or illegal activity. Teammates also are expected to be aware of and comply with these requirements.

The healthcare industry is one of the most highly regulated industries in the United States, due to regulations ranging from those dealing with patient care to those dealing with submission of claims. While it is impossible to discuss every law, rule and regulation that applies to the healthcare industry, what follows is a discussion of topics that are especially important and central to our commitment to excellence in patient care and moral integrity.

Antitrust Laws

We are committed to conducting business in full compliance with antitrust and competition laws, which promote free, open, and fair competition. These laws apply to all levels of our organization and prohibit activities that harm competitive markets.

Prohibited Conduct Includes:

- Anti-competitive agreements with competitors—including discussions or arrangements on bids, pricing, sales terms, customer allocation, or market division.
- Unlawful non-compete or non-solicitation agreements that unreasonably restrict competition.
- Abuse of market power, such as predatory practices or exclusionary conduct.
- Sharing confidential business information (e.g., pricing, strategies) with competitors.
- Transactions or conduct that substantially lessen competition, create monopolies, or unfairly dominate markets.

We compete ethically and on merit—never through anti-competitive behavior. If you have questions or concerns about potential antitrust risks, consult the Legal Department before proceeding.

Anti-Corruption and Anti-Bribery Laws

LifeStance is committed to upholding the highest ethical standards in all international business dealings. Compliance with the U.S. Foreign Corrupt Practices Act (FCPA) and the anti-corruption and anti-bribery laws of all operating countries is mandatory. These laws generally adhere to three key principles:

1. **Prohibition of Bribes to Government Officials** – No bribes or improper payments may be made to government officials or employees.
2. **Prohibition of Private Commercial Bribery** – Bribes to individuals associated with non-government entities are strictly prohibited.
3. **Accurate Recordkeeping** – Maintaining precise books, records, and internal accounting controls is required.

LifeStance prohibits directly or indirectly giving, offering, or promising anything of value to any government official, employee, or other party to secure business or an unfair advantage. This expectation extends to business partners, vendors, and third parties acting on behalf of LifeStance.

All payments must be fully documented with a clear and legitimate business purpose. Additionally, soliciting or accepting anything of value from any entity conducting business with LifeStance is prohibited if it could influence or appear to influence impartial decision-making or may compromise or appear to compromise our business decisions.

Anti-Money Laundering and Anti-Terrorism

LifeStance adheres to all applicable U.S. and international laws prohibiting money laundering, terrorist financing, and economic sanctions. This includes restrictions on conducting business with sanctioned countries, individuals, or entities designated as "specially designated nationals" or "blocked persons" by the U.S. Treasury Department's Office of Foreign Assets Control (OFAC). Money laundering—the concealment of illegally obtained funds to make them appear legitimate—is strictly prohibited. LifeStance engages only with reputable vendors, suppliers, and business partners involved in lawful activities and funded through legitimate sources. Any suspicious financial activity must be reported in accordance with company policies and legal requirements.

Anti-Kickback Laws

LifeStance maintains strict adherence to all applicable anti-kickback laws and regulations when engaging with physicians and other referral sources. In the U.S., these laws prohibit offering, soliciting, or receiving any form of compensation intended to influence referrals or business involving government-funded healthcare programs, such as Medicare or Medicaid. LifeStance prohibits any improper exchange of value—whether direct or indirect—that could be construed as an inducement for referrals or business generation. All team members are responsible for understanding and complying with the company's anti-kickback policies, as well as all relevant federal and state laws governing these practices. Upholding these standards ensures ethical business conduct and protects the integrity of our operations.

State Fee Splitting Laws

LifeStance adheres to all applicable state laws prohibiting fee splitting, which generally ban the sharing of professional fees with individuals or entities that did not directly provide the associated healthcare services. These laws protect against conflicts of interest and ensure that patient care decisions remain independent of financial incentives. All financial arrangements with healthcare providers, contractors, or third parties must comply with state-specific regulations and be structured to reflect fair market value for actual services rendered. Team members must avoid any arrangement that could be interpreted as improper fee sharing and should consult Legal or Compliance Teammates when evaluating potential business relationships.

Self-Referral – Stark Law

LifeStance strictly complies with the federal Stark Law, which prohibits physicians from referring Medicare/Medicaid patients to entities with which they (or immediate family members) have a financial relationship—unless an exception applies. This law also bars billing for services resulting from prohibited referrals. All financial relationships with physicians, including compensation arrangements, leases, and ownership interests, must be carefully structured to meet Stark Law exceptions (e.g., fair market value, commercially reasonable terms). Team members must proactively disclose and review any potential physician financial relationships with the Legal or Compliance department to ensure adherence to these requirements. Violations may result in severe penalties, including fines and exclusion from federal healthcare programs.

Patient Inducement Prohibition Laws

LifeStance is committed to ethical patient engagement practices that comply with all applicable laws prohibiting inappropriate inducements. Federal regulations, including the Civil Monetary Penalty Law, strictly prohibit offering gifts, financial incentives, or other items of value to Medicare or Medicaid beneficiaries when such offerings could influence their choice of healthcare provider. This prohibition extends to any arrangement that may unduly affect a patient's decision to seek or continue treatment with LifeStance.

All interactions with patients must be based on the quality of care and professional services provided, never on improper incentives. Team members should consult the Compliance department with any questions regarding permissible patient engagement activities. By maintaining these standards, we ensure our patient relationships remain ethical, compliant, and focused on delivering exceptional care.

False Claims Act

LifeStance maintains a strong commitment to preventing fraud, waste, and abuse in healthcare through rigorous compliance measures. Our comprehensive program includes policies, procedures, and training to educate both employees and business partners about their responsibilities under the U.S. False Claims Act (FCA) and other anti-fraud laws.

The FCA prohibits knowingly submitting false or fraudulent claims to federal healthcare programs, as well as improperly retaining government overpayments. LifeStance strictly adheres to these requirements and has implemented robust controls to ensure accurate billing practices and proper identification/return of any overpayments.

All team members play a critical role in upholding these standards by remaining vigilant against potential fraud, waste, or abuse. Suspected violations must be reported immediately through proper channels as outlined in company policies. Together, we maintain the integrity of our services and protect vital healthcare resources.

Information Privacy and Security Laws

LifeStance is committed to protecting the confidentiality, integrity, and security of patient and employee information in compliance with all applicable privacy laws, including HIPAA, state-specific regulations, and international data protection standards if and as applicable. We implement robust administrative, technical, and physical safeguards to secure sensitive data against unauthorized access, use, or disclosure.

All team members must adhere to strict protocols when handling protected health information (PHI), personally identifiable information (PII), reproductive and substance use health records, including proper storage, transmission, and disposal methods (protected information). Any access to any protected information and sensitive data must be limited to authorized personnel with a legitimate business need.

All protected information must only be accessed, stored, or processed using LifeStance-provided computer equipment or LifeStance-approved security measures. Unauthorized devices, personal equipment, or unapproved software/services are strictly prohibited for handling sensitive data.

Teammates must adhere to all organizational policies, including encryption, access controls, and secure authentication methods, to ensure compliance with HIPAA and other applicable regulations. Violations may result in disciplinary action, up to and including termination.

Given the serious nature and need for immediate mitigation, suspected privacy breaches or security incidents must be reported immediately to the Compliance and IT Security team. By maintaining rigorous data protection practices, we uphold our ethical obligation to safeguard information while delivering trusted healthcare services.

Marketing and Advertising Practices

LifeStance maintains the highest standards of integrity in all marketing and advertising practices. As a public company, we ensure all communications are truthful, transparent, and compliant with applicable securities laws, advertising regulations, and FTC guidelines. Our marketing initiatives—including public education campaigns, partnerships, service promotions, and recruitment efforts—are designed to provide accurate information while avoiding misleading claims or deceptive practices.

When making forward-looking statements, we adhere to SEC regulations and include appropriate cautionary language. Specific marketing materials must be reviewed and approved through proper channels to verify compliance with legal requirements and corporate standards. The process will be established by Legal, Compliance, and the Marketing Department leaders. By upholding these principles, we protect our reputation, maintain stakeholder trust, and demonstrate our commitment to ethical business practices.

Americans with Disabilities Act and Limited English Proficiency

LifeStance upholds the principles and requirements of the Americans with Disabilities Act (ADA) for both Teammates and patients. The organization provides reasonable accommodations to qualified individuals with disabilities, ensuring equal access to employment opportunities, services, and facilities. All employment decisions, patient care delivery, and facility operations comply with ADA standards, prohibiting discrimination based on disability. Teammates must engage in the interactive accommodation process when requested, while maintaining confidentiality of disability-related information, see the LifeStance Teammate Handbook for more information. Facilities and digital platforms maintain accessibility standards to serve patients with diverse needs. Concerns regarding ADA compliance should be reported to Human Resources for employment matters or the Compliance Department for escalated patient care issues.

LifeStance complies with the Affordable Care Act's (ACA) requirements to ensure meaningful access to care for patients with Limited English Proficiency.

Qualified language assistance services, including professional interpretation and translation, are provided at no cost to patients throughout all stages of care—from scheduling to treatment and billing. The Company prohibits the use of family members, friends, or minor children as interpreters, except in emergency situations when a professional interpreter cannot be immediately accessed. Concerns or assistance with language access services for patients should be directed to the Compliance Department.

Occupational Safety and Health – OSHA

LifeStance is committed to maintaining a safe and healthy work environment for all team members in compliance with the Occupational Safety and Health Act (OSHA) and other applicable regulations. We prioritize accident prevention, hazard mitigation, and the promotion of workplace safety through established policies, regular training, and proper equipment maintenance. All Teammates are responsible for following safety protocols, reporting potential hazards, and adhering to ergonomic best practices. Managers must ensure their teams have the necessary resources and knowledge to perform duties safely. The Company's OSHA manual and written exposure plan is located on the Compass. Any workplace injuries, near misses, or safety concerns must be reported immediately to enable prompt corrective action. By fostering a culture of safety awareness and accountability, we protect our most valuable asset—our people—while delivering quality care.

Our Teammates will be provided a safe workplace and a safe environment. Threats, threatening language or any other acts of aggression or violence are not tolerated. All potentially dangerous situations should be reported immediately to a manager, supervisor, department leadership, the Security Officer, or Human Resources.

Relationships with Others

At LifeStance, we are committed to fostering compliant, professional, ethical, and respectful relationships with colleagues, patients, referral sources, and business partners. All interactions should reflect our values of integrity and transparency while complying with company policies and applicable laws which include but are not limited to the laws outlined herein this Code.

In any situation where interpretation of this Code of Conduct creates ambiguity or presents conflicting guidance, LifeStance's formal policies and procedures shall serve as the definitive authority for all Teammates. By maintaining clear boundaries and ethical standards in all relationships, we uphold trust, fairness, and accountability in every aspect of our work.



Interactions with Patients

At LifeStance, we transform lives by delivering clinically excellent, compassionate care to every patient. We treat individuals with warmth, respect, and dignity, providing medically necessary and evidence-based interventions tailored to their unique needs. Patients should be actively engaged as partners in their care, with involvement in treatment planning and decisions whenever appropriate.

We uphold strict non-discrimination policies across all aspects of care, ensuring equitable access and unwavering commitment to each person's well-being. Through this approach, we honor our mission to help people lead healthier, more fulfilling lives by improving access to trusted, affordable, and personalized mental healthcare.

Appropriate Patient Relationships

At LifeStance, all Teammates must maintain strictly professional relationships with patients, characterized by respect, ethical conduct, and appropriate boundaries. These standards protect both patient well-being and clinician integrity, ensuring all interactions remain therapeutic, objective, and focused on clinical needs. Romantic, financial, or other personal relationships with current patients are strictly prohibited, as are any actions that could exploit trust, create conflicts of interest, or compromise impartiality. Teammates must immediately report any circumstance that may blur these boundaries to their supervisor, department leadership, Employee Relations Hotline (800-308-0994 option 2), or the Human Resources Department. Adherence to these principles is essential to preserving trust and safety at the core of our patient care mission. Teammates must at all times adhere to and comply with LifeStance's Romantic or Sexual Relationships with Employees or Patients Policy located on the Compass.

Business Relationships

LifeStance conducts all business interactions with integrity, transparency, and compliance with applicable laws. Relationships with vendors, partners, and payers must avoid conflicts of interest and never involve kickbacks, improper inducements, or preferential treatment. All financial arrangements (e.g., contracts, referrals) must be documented, fair-market-valued, and aligned with regulatory requirements. Teammates must disclose potential conflicts to the Compliance Department.

Physician and Other Provider Relationship

Collaborations with physicians and licensed healthcare providers must adhere to strict ethical and legal standards. All referrals and financial arrangements (e.g., leases, service agreements) must comply with anti-kickback statutes, Stark Law, and Company policies. No remuneration or benefit may be offered or accepted to influence patient referrals. Relationships must be formally documented, commercially reasonable, and reviewed by Legal/Compliance. Suspected violations must be reported immediately.

Interactions with Referral Sources

At LifeStance, we maintain ethical, compliant relationships with referral sources in full alignment with federal and state laws, including the Anti-Kickback Statute and Stark Law. If relationships with actual or potential referral sources are properly structured, but not diligently administered, failure to administer the arrangements as agreed may result in violations of the law and serious consequences for the Company.

All financial or referral arrangements must serve legitimate business purposes, be documented in writing, receive prior approval from Compliance and/or Legal Teammates, and be monitored for ongoing adherence.

We prohibit any improper inducements for patient referrals and expect all team members to uphold these standards diligently. Violations will result in disciplinary action. Detailed policies and procedures are located on the Compass.

Gift and Business Courtesies

LifeStance maintains the highest ethical standards in all business relationships. While gifts and professional courtesies (such as meals or modest gifts) may occasionally be exchanged as expressions of goodwill or routine business practice, these interactions are permitted only in limited circumstances compliant with regulations and our policies. Any gift or business courtesy—whether offered, solicited, or received—that could influence patient referrals or other business payable by health insurance plans are strictly prohibited.

We categorically forbid gifts, incentives, or benefits that could improperly influence decisions, as well as all forms of bribery, kickbacks, or inducements.

Teammates must adhere to LifeStance's Gift Policy and Business Courtesy to Referral Sources Policy located on the Compass, which govern the exchange of gifts, hospitality, or other courtesies.

These policies ensure that relationships remain appropriate, free from actual/perceived conflicts of interest, and compliant with anti-kickback and anti-bribery laws. Any gifts or business courtesies—whether given or received—must be properly documented and pre-approved when required. Accepting items, services, or meals above a de minimis value from actual or potential vendors/suppliers could trigger various reporting obligations, such as the Sunshine Act reporting and must be avoided.

Government interactions carry heightened scrutiny: no items of value may be provided to officials or intermediaries unless expressly permitted by both LifeStance policies and applicable laws. All Teammates and partners must adhere to these standards without exception, ensuring relationships remain transparent, ethical, and beyond reproach. When in doubt, consult the Compliance Department before accepting or offering any item of value.

Dealing Honestly With Third-Party Payors

Fraud and Abuse Prohibition.

LifeStance strictly prohibits fraud or abuse in all business dealings. Fraud is defined as:

- A deliberate misrepresentation of material facts to secure undue benefit (fraud by commission)
- Intentional omission of material facts that results in misrepresentation (fraud by omission)

Abuse refers to practices that unnecessarily increase costs to Medicare, Medicaid, or commercial payors, regardless of intent. The distinction between fraud and abuse hinges on whether acts are willful or negligent.

Billing and Claims Integrity

The Company prohibits any Teammates of the Company from knowingly presenting or causing to be presented claims for payment or approval which are false, fictitious or fraudulent. The Company will bill only for services as rendered. LifeStance bills exclusively for services actually provided. All claims submitted to government programs, private insurers, or patients must:

- Accurately reflect services rendered
- Comply with all applicable federal/state laws
- Never include false, fictitious, or misleading information

Documentation Standards

To avoid allegations of fraudulent claims and to support payment for the services, Teammates must accurately and completely document clinical and financial/billing information. Teammates must document patient or financial/billing information in a manner that is not misleading, inaccurate or untrue. The clinical records must accurately reflect information to support the medical necessity for the service and appropriate utilization. Documentation must be provided for all services rendered. Clinical records and notes used as the basis for a claim submission will be prepared timely, appropriately organized and in a legible form so that they can be audited and reviewed. Clinical records may be amended to correct an error or to complete documentation only in accordance with established medical records procedures, but not for the purpose of covering up errors or obtaining a payment to which the Company is not entitled. Clinical and billing records must:

- Support medical necessity and service utilization
- Be completed contemporaneously, legibly, and audit-ready
- Never be altered to conceal errors or secure improper payments
- Allow amendments only per established medical records policies

Coding

The Company will prepare claims for services using only billing codes, including procedure and diagnosis codes, that accurately describe the services that were provided and the services and medical conditions that were accurately documented in the medical record. Teammates shall not engage in any improper coding techniques that would result in a classification and payment higher than one that properly reflects the service actually performed (upcoding). Teammates shall not improperly bill services separately that are required to be billed together (unbundling). Claims must use only codes that:

- Precisely match documented services and diagnoses
- Avoid prohibited practices (e.g., upcoding, unbundling)

Communication to Assure Correct Billing- Interdepartmental Coordination

Clinical and billing teams must maintain clear communication to ensure accuracy. Compensation structures for billing personnel may not incentivize improper coding. Diagnosis and procedures reported on reimbursement claims will be based on the clinical record and other documentation.

Billing Questions – Reporting Obligations

Teammates with billing/coding concerns must report these concerns via this process:

1. Immediately notify their supervisor or department leadership
2. If not resolved or explained to the Teammate's satisfaction, escalate unresolved issues through management chains and make a Compliance report as outlined above.

Contact the Revenue Cycle Manager or use approved reporting channels if uncomfortable with supervisor or department leadership disclosure, or report through the Compliance Hotline.

Fair Treatment of Fellow Teammates/Harassment

LifeStance is committed to providing an environment in which Teammates are treated with dignity and respect. An environment that is free from all forms of harassment or discrimination helps our Teammates perform effectively and gain both personal and professional satisfaction from their work.

Any form of unlawful harassment or discrimination based upon protected classes and factors is strictly prohibited and will not be tolerated. Any employee who reports discrimination or harassment is protected from retaliation for making the report. Any manager who observes an incident or has received a report of an incident is required to report the information immediately to Human Resources.

Conflicts Of Interest

LifeStance should refrain from conducting or entering into business, financial or other relationships that conflict with the interests of LifeStance or our ability to perform our LifeStance duties or that otherwise compromise our professional judgment. We do not accept employment or fees from business partners, vendors, contractors, patients, competitors, physicians or other referral sources, governments or other third parties if we have the ability to influence their relationship with LifeStance. Each section applies to all Teammates unless otherwise specified therein. For more information, review the Company's Employee Handbook and Conflict of Interest policy on the Compass.

General Principles

Teammates must refrain from engaging in business, financial, or personal relationships that conflict with LifeStance's interests. This includes employment, consulting, or financial arrangements with business partners, vendors, competitors, referral sources, or government entities if they could impact impartial decision-making. All potential conflicts must be disclosed promptly using the company's conflict-of-interest disclosure process.

Examples of Conflicts

A conflict may exist if, for example, a Teammate involved in procurement has a close personal relationship with a supplier who stands to benefit from their decisions. Such situations require review by management or the Compliance team to determine appropriate mitigation steps.

Outside Employment & Moonlighting

External employment or activities must not interfere with LifeStance duties, compete with the organization's services, or create actual or perceived conflicts of interest. All Teammates must disclose outside roles and comply with policies governing secondary employment. Teammates owe undivided allegiance to the Company during their employment, prioritizing organizational interests over personal gain or competing activities.

Business Opportunities & Relationships

Opportunities arising from work at LifeStance belong exclusively to the organization. Teammates may not use company resources, confidential information, or their position for personal gain. Personal relationships with vendors, patients, or referral sources must not influence business decisions—any such connections should be disclosed to ensure objectivity. Any outside ownership or financial interest by our Teammates or their immediate family with an actual or potential vendor, supplier, partner, or contractor, must be immediately reported pursuant to the LifeStance Conflict of Interest policy on the Compass.

Friends and Relatives

LifeStance requires all business decisions to be made objectively, free from undue influence by personal relationships. Teammates must recuse themselves from decisions involving individuals with whom they have close personal connections, including but not limited to business partners, vendors, patients, competitors, or government officials. While such relationships do not inherently constitute conflicts of interest, they require proactive disclosure to supervisors, department leadership, and the Compliance Department for evaluation. Transparency ensures proper safeguards are implemented to maintain integrity in all business dealings. This policy applies to both existing and potential decisions where personal relationships could reasonably be perceived as compromising impartial judgment. All Teammates bear responsibility for identifying and reporting these situations promptly.

Compliance & Accountability

Failure to disclose conflicts may result in disciplinary action up to and including termination. By prioritizing transparency, we uphold ethical standards and protect the integrity of our operations.

Honorariums

Directors and above Teammates may accept honorariums only with prior written approval from the Compliance team, which evaluates each request to ensure compliance with company policies and absence of conflicts of interest. The Compliance team will assess the nature of the engagement, its relationship to company business, and all relevant compliance considerations before granting approval. This structured approval process maintains our ethical standards while allowing appropriate professional opportunities when properly vetted. Materials being used may require prior legal and compliance review. All honorarium arrangements must be reviewed and pre-approved; violations of this policy may result in disciplinary action.

Everyone's Responsibilities

Confidentiality Of Business-Related Records

LifeStance maintains strict protocols governing the protection and handling of all business records, which constitute confidential and proprietary Company information if not otherwise known to the public. Various federal and state regulations mandate minimum retention periods for specific document categories, while business needs often require rapid retrieval of corporate records. Employees may only access, use, or disclose business information when directly related to their job responsibilities. Unauthorized removal or electronic transmission of Company records—including copies—without proper managerial approval constitutes a violation of Company policy.

Confidentiality/Security of Electronic Records

The digital nature of modern business and medical records creates heightened vulnerability to unauthorized access. All personnel must implement appropriate safeguards for electronic systems, including:

- Exclusive use of assigned passwords for authorized job functions
- Diligent protection of login credentials
- Securing work areas where confidential information may be visible
- Compliance with the organization's comprehensive Privacy and Security Program, located on the Compass

LifeStance implements rigorous safeguards for all protected information, including:

- Confidential business and proprietary data
- Protected health information (PHI) under HIPAA
- Personally identifiable information (PII)
- Sensitive health records (reproductive/SUD treatment)

The organization maintains specialized security controls, access restrictions, and handling policies. Any suspected privacy breaches—affecting either patients or employees—require immediate reporting to the Compliance Department through designated channels outlined in this Code.

Safeguarding Assets

All LifeStance Teammates bear responsibility for protecting and properly utilizing company resources, including funds, property, equipment, intellectual assets, and information systems. Company assets must be used exclusively for legitimate business purposes in accordance with established policies and procedures.

Key Responsibilities Include:

- Exercising diligence in the expenditure of Company funds and use of physical assets
- Protecting all technology systems from unauthorized access or misuse
- Maintaining proper stewardship of patient and customer information
- Complying with software licensing agreements and copyright requirements
- Disposing of Company property only through approved methods

Information Security Requirements: LifeStance computers and systems do not guarantee personal privacy. All Teammates must:

- Safeguard intellectual property, trade secrets, and confidential business information
- Restrict sharing of proprietary information for authorized business purposes only
- Exercise extreme caution when using AI tools, ensuring no protected health information (PHI) or personally identifiable information (PII) is entered
- Obtain proper authorization before disclosing any company information externally

Prohibited Actions Include:

- Unauthorized use or disposal of Company property (considered theft)
- Personal use of business equipment and supplies
- Disclosure of confidential information without proper authorization
- Making external statements to media without approval from Communications/Legal

These obligations continue even after employment ends. Violations may result in disciplinary action, up to and including termination and legal consequences. The use of a LifeStance computer does not guarantee personal privacy.

Social Media

LifeStance recognizes the importance of social media while establishing clear guidelines to protect confidential information and maintain professional standards. As a Teammate of LifeStance, you have access to confidential information, such as business records, patient information and marketing strategies. Teammates are prohibited from using social media (including the disclosure of photographs) to disclose confidential patient and business information.

The Marketing Department manages LifeStance's social media channels. All official company communications require prior authorization from the Marketing Department, see the LifeStance's Social Media Guidelines located on the Compass for more information. Teammates must comply with copyright, trademark, and financial disclosure laws, and may not speak on behalf of LifeStance without written permission. When personal social media profiles identify an association with LifeStance, Teammates must clearly state that their views are personal and not representative of the organization. These standards apply to all current and emerging social platforms, including but not limited to Facebook, LinkedIn, Twitter/X, blogs, and wikis, with violations potentially resulting in disciplinary action up to and including termination.

Insider Trading

LifeStance strictly prohibits the use of material non-public information for personal benefit or securities trading. During the course of work, Teammates may access confidential information about LifeStance or its publicly traded partners that is not available to the general public (e.g., upcoming mergers, financial results). Such insider information must never be used for personal financial gain to buy/sell stock or sharing it with others for trading purposes, as these actions violate both company policy and U.S. securities laws, and grounds for termination and legal action.

If your role involves regular access to material nonpublic information (typically Officers, Vice Presidents, members of the finance team and certain other individuals, all transactions involving LifeStance securities (LFST) require advance approval from the Chief Legal Officer and you are prohibited from trading during designated blackout periods. These restrictions apply regardless of how the non-public information was obtained or whether the individual is actively employed at the time of trading.

Violations of this policy may result in severe consequences, including disciplinary action up to and including termination, as well as potential civil and criminal penalties. Teammates with questions about permissible trading activities should consult with the Chief Legal Officer before executing any transactions. A copy of the Insider Trading policy can be accessed on the Compass located here.

Public Company Disclosure Obligations

LifeStance business affairs are also subject to certain internal and external disclosure obligations and recordkeeping procedures. As a public company, we are committed to abiding by our disclosure obligations in a full, fair, accurate, timely and understandable manner. Only with reliable records and clear disclosure procedures can we make informed and responsible business decisions.

When disclosing information to the public, it is the Company's policy to provide consistent and accurate information. To maintain consistency and accuracy, specific Company spokespersons are designated to respond to questions from the public. Only these individuals are authorized to release information to the public at appropriate times. All inquiries from the media or investors should be forwarded immediately to the Marketing Department.

Our internal control procedures are further regulated by the Sarbanes-Oxley Act of 2002. We take seriously the reliance our investors place on us to provide accurate and timely information about our business. In support of our disclosure obligations, it is our policy to always:

- Comply with generally accepted accounting principles;
- Maintain a system of internal accounting and disclosure controls and procedures that provides management with reasonable assurances that transactions are properly recorded, and that material information is made known to management;
- Maintain books and records that accurately and fairly reflect transactions; and
- Prohibit establishment of material undisclosed or unrecorded funds or assets.

Contracts and Arrangements with Physicians

All arrangements with clinicians, physicians, and other referral sources must be in writing and must identify the specific service that the professional is paid to provide. Agreements must include specific and realistic time commitments and compensation rates for the services that are at fair market value. The compensation rate cannot be based on the volume or value of any business referred to LifeStance. All decisions regarding patient care should be made based on what is best for the patient, not on the value of a business arrangement.

All payments or other benefits provided to clinicians must be supported with documentation adequate to justify the legal business purpose for which the payment is being made. Documentation must also confirm that the services contracted were, in fact, provided.

The Federal Anti-Kickback Statute prohibits payments or other consideration given to clinicians for referrals for services. State laws often have similar prohibitions. When dealing with a physician, no employee will take anything from, or offer to give anything to, the physician in exchange for the referral of patients or patient-related services to or from the physician, see the LifeStance Gift and Business Courtesy Policies, and Compliance with the Anti-Kickback Statute Policy located on the Compass.

Prior to entering into any arrangement with, or making any payment to, a physician or other healthcare provider, contact the Legal and the Compliance team. All contracts with or payments to clinicians must be pre-approved by the Compliance Officer, or a lawyer from our Legal Team specifically designated for this purpose by the Company, before finalizing the contract with the physician. This is done to ensure that any contractual arrangements do not violate the Federal Anti-Kickback Statute, the Stark Law, or any other law or internal policy.

Self-Referral Prohibitions

LifeStance will not knowingly submit a bill or charge for certain services in which the referring physician/clinician (or an immediate family member) has a financial relationship with the Company, unless certain exceptions are met.

Because of the complexity of these laws, approval from the Compliance Officer, or a lawyer from our Legal Team specifically designated for this purpose by the Company, must be obtained prior to establishing a financial relationship with any physician, clinician, actual or potential referral source.

Record Management

LifeStance maintains a comprehensive records management program to ensure the proper retention, protection, and disposal of company documents in compliance with legal, regulatory, and operational requirements. The formal records retention schedule specifies document categories, corresponding retention periods, and appropriate storage methods. This systematic approach applies to all physical and electronic records, including but not limited to financial documents, patient records, human resources files, and operational reports.

Special protocols govern documents related to actual or anticipated litigation, government investigations, or compliance matters. Such records must be immediately identified and preserved under legal “Document Hold” procedures that prevent alteration or destruction. The Legal Department oversees these preservation requirements and provides guidance on exceptional circumstances.

All Teammates share responsibility for adhering to records management procedures. These policies, procedures, and retention schedules are located on the Compass should be reviewed prior to any document or data disposal.

Clinician Responsibilities

All licensed healthcare professionals ("clinicians") are expected to deliver care in alignment with national and local standards of care, evidence-based care and treatment, and applicable clinical, ethical, and regulatory guidelines—including professional licensing requirements.

Clinical staff who work for LifeStance are required to adhere to LifeStance's policies and procedures, applicable laws and regulations, accrediting body regulations, this Code, Clinical Governing Bylaws, clinical policies and protocols, employment agreements, and the Company's Teammate Handbook. Compliance with these expectations is mandatory, and violations may result in corrective action, up to and including termination.

Quality Patient Care

We transform lives by delivering compassionate mental healthcare tailored to each patient's needs. Every individual receives respectful, dignified treatment without discrimination, grounded in medical necessity and clinical appropriateness. We actively engage patients in their care decisions, empowering them as partners in their treatment journey. At LifeStance, we are dedicated to delivering the highest standard of patient care, grounded in evidence-based practices and clinical excellence. All care provided must align with current medical research, professional guidelines, and best practices to ensure optimal patient outcomes.

Qualified Providers

Our clinicians are licensed, qualified professionals who deliver evidence-based mental healthcare with integrity and expertise. They uphold the highest standards of clinical practice, ensuring treatments are tailored to each patient's needs, grounded in current research, and aligned with ethical guidelines.

Before they are allowed to treat LifeStance patients, Clinicians are appropriately credentialed and privileged as required by applicable laws and regulations. Clinical staff who work for LifeStance are required to adhere to LifeStance policies and procedures, applicable laws and regulations, and this Code of Conduct

Credentials and Excluded Parties

LifeStance ensures patient safety and regulatory compliance by requiring all clinical professionals to maintain current, valid licenses and credentials. The Company prohibits employment or contracting with any individual or entity excluded from federal or state healthcare programs, including OIG LEIE and SAM databases, or convicted of disqualifying offenses. All Teammates undergo thorough background screenings at hire and at regular intervals thereafter, including verification of professional licenses, exclusion list status, and criminal history.

Any individual found to violate these standards will be immediately disqualified from providing services. These measures demonstrate our commitment to maintaining qualified, trustworthy care teams in full compliance with healthcare regulations.

Clinician Teammate Reporting

Clinician Teammates agree to maintain all necessary and applicable state and federal licenses, certifications, and authorizations to perform the Services, as determined by Company. Clinician Teammates are required to immediately report to LifeStance in the event of any of the following voluntary or involuntary changes and/or occurrences:

- had their professional license, DEA license, Medicare or Medicaid provider status or staff privileges at any hospital or medical facility suspended, relinquished, terminated or revoked;
- been reprimanded, sanctioned, disciplined, suspended, debarred or excluded by any licensing board or any federal, state or local society or agency, governmental body, hospital, third party payer or specialty board;
- in the last six (6) years, had a final judgment or settlement without judgment entered against him or her in connection with a malpractice or similar action; and/or
- in the last six (6) years, been a party to a lawsuit, governmental or administrative proceeding or investigation, related to the practice of Provider's profession, nor, to the knowledge of Provider, have any of the foregoing been threatened.

Teammate Responsibilities



All LifeStance Teammates must adhere to applicable laws, regulations, and company policies, including this Code of Conduct. To support compliance, Teammates complete mandatory annual training on the Compliance Program, relevant laws, and job-specific regulations, with certification of completion required.

Teammates bear responsibility for reporting suspected violations of the Code, Compliance Program, or laws through designated channels to either their supervisor, department leadership, or the Chief Compliance Officer.

The Company conducts initial and periodic background screenings to verify eligibility for employment and participation in federal healthcare programs.

LifeStance maintains an open-door policy for compliance-related questions, encouraging consultation with supervisors or the Compliance Department. Active participation in monitoring activities and cooperation with investigations represent essential responsibilities. Compliance with these standards factors into performance evaluations, while violations may result in disciplinary action up to and including termination.

Drugs and Alcohol

LifeStance maintains a strict substance-free workplace to ensure the safety, health, and well-being of our patients, Teammates, and partners. The unauthorized use, possession, or distribution of illegal drugs or the misuse of prescription medications or alcohol is strictly prohibited. These substances compromise our ability to maintain a secure, productive, and professional environment. All Teammates are expected to report to work free from the influence of any impairing substances. Violations of this policy may result in disciplinary action, up to and including termination of employment.

While alcohol may be served at approved Company events where legally and culturally appropriate, Teammates must exercise sound judgment regarding consumption. The Company encourages Teammates struggling with substance abuse to seek assistance through available support resources.

Leadership Responsibilities

Supervisor/Managers/Department Leadership - Responsibilities

LifeStance supervisors, managers, and department leadership bear critical responsibility for upholding compliance standards within their teams. All management and leadership personnel must maintain openness to compliance concerns while demonstrating exemplary ethical conduct.

Key responsibilities include ensuring proper hiring practices that screen for ethical alignment, clearly communicating compliance expectations as a condition of employment, working knowledge of policies and procedures, being available for questions and report, and providing job-specific ethics training.

Ethical alignment, for purposes of this code shall mean, behavior and interactions that align with LifeStance's mission, visual, values, and this Code of Conduct.

Managers and leaders serve as role models by actively supporting the Compliance Program in both words and actions. This includes diligently monitoring for potential issues, detection-reporting of wrongdoing, promptly addressing reported concerns without retaliation, and incorporating compliance adherence into performance evaluations. The organization strictly prohibits any form of retaliation against Teammates who raise compliance questions or report potential violations.

All compliance concerns brought to management or leadership's attention require immediate reporting to the Chief Compliance Officer or the Compliance team for proper handling according to established protocols.

Management and leadership's promotion of and commitment to compliance standards directly factors into performance assessments, with potential sanctions for insufficient diligence in these responsibilities.

Code of Ethics for Senior Financial Officers and Chief Executive Officer

Under the Sarbanes-Oxley Act of 2002 and related Securities and Exchange Commission (SEC) rules, the Company is required to disclose whether it has adopted a written Code of Conduct for its Senior Financial Officers and the Chief Executive Officer (CEO). Any amendments to, or implicit or explicit waiver of, the Code of Ethics for Senior Financial Officers and the CEO must be publicly disclosed as required by SEC and New York Stock Exchange (NYSE) rules. “Senior Financial Officers” include, but are not limited to, the Company’s Chief Financial Officer (CFO), controller, and corporate officers with financial accounting and reporting responsibilities.

The Code must be reasonably designed to deter wrongdoing and to promote: honest and ethical conduct, including the ethical handling of actual or apparent conflicts of interest between personal and professional relationships; full, fair, accurate, timely and understandable SEC filings and submissions and other public communications by the Company; compliance with applicable governmental laws, rules and regulations; prompt internal reporting of violations of the Code; and accountability for adherence to the Code.

The CEO and all Senior Financial Officers are bound by all provisions of this Code of Conduct, including, but not limited to, those provisions relating to ethical conduct, conflicts of interest, compliance with law, and internal reporting of violations of the Code. The CEO and all Senior Financial Officers also have responsibility for full, fair, accurate, timely and understandable disclosure in the periodic reports and submissions filed by the Company with the SEC as well as in other public communications made by the Company (“Public Communications”).

Accordingly, it is the responsibility of the CEO and each Senior Financial Officer promptly to bring to the attention of the internal working group responsible for the review of the Company’s periodic SEC reports any information of which he or she may become aware that materially affects the disclosures made by the Company in its Public Communications. The CEO and each Senior Financial Officer also shall promptly bring to the attention of the Disclosure Committee any information he or she may have concerning significant deficiencies in the design or operation of internal controls that could adversely affect the company’s ability to record, process, summarize and report financial data; or any fraud, whether or not material, that involves management or other employees who have a significant role in the Company’s financial reporting, disclosures or internal controls.

Any waiver of or amendments to the Code of Conduct for Senior Financial Officers and the CEO must be approved by the Audit and Compliance Committee of the Board of Directors and disclosed in accordance with SEC and NYSE rules.

Board Responsibilities

The LifeStance Board of Directors maintains oversight responsibility for the Company's compliance program and ethical culture. As governance leaders, Board members must demonstrate exemplary integrity and maintain working knowledge of the Compliance Program to effectively guide organizational standards. Their leadership establishes the foundation for ethical conduct throughout LifeStance as both a public company and mental healthcare provider.

Compliance Officer and Compliance Committee Responsibilities

The Board has appointed a Chief Compliance Officer to direct compliance activities and administer the Corporate Compliance Program. The Chief Compliance Officer and members of the Compliance department are available to answer questions and provide advice or accept reports about compliance concerns. A Board Clinical Quality and Compliance Committee, made up of members of the Board of Directors and senior management, has been established to assist the Chief Compliance Officer in the oversight and prioritization of the LifeStance Compliance Program.

Teammates may raise questions or report compliance concerns to a Compliance team member who may report such issues to the Chief Compliance Officer if necessary and appropriate. The Compliance team members will assist with implementation of compliance activities. The Chief Compliance Officer, Compliance team members, and Compliance Committee members will serve as an example to others in the Company for ethical conduct related to Company business.

Company Responsibilities

Respecting Human Rights

LifeStance upholds fundamental human rights throughout our organization. LifeStance prohibits the use of illegal child labor and does not accept any form of forced labor including human trafficking in our operations.

Equal Employment Opportunity Workplace

LifeStance fosters an inclusive work environment free from discrimination. Employment decisions, including hiring and promotions, are based solely on merit, job performance, and the ability to meet patient and business needs. All Teammates must maintain professional, objective interactions and comply with anti-discrimination laws. The organization provides reasonable accommodations for qualified individuals with disabilities as required by law. Concerns regarding discrimination or harassment should be reported immediately to a supervisor, department leadership, or Human Resources

Legal Employment

LifeStance maintains strict adherence to all applicable employment laws. Teammates must possess and keep current all required professional licenses, certifications, and credentials for their positions.

LifeStance maintains strict adherence to all applicable employment laws. Teammates must possess and keep current all required professional licenses, certifications, and credentials for their positions. The Company conducts regular screenings against government sanction lists, including, but not limited to:

- OIG Exclusions List
- NPDB List
- GSA's SAM database
- Medicaid disbarment or exclusions

Any Teammate who becomes aware of potential sanctions or exclusions must notify the Human Resources and Compliance Department without delay.

Contractor/Vendor Responsibilities

From time to time, the Company will contract with individuals and entities for services and supplies. Such contractors/vendors will be made aware of the Compliance Program and will be required to comply with training requirements and the Compliance Program as relevant to the services or supplies they provide to the Company.

In Conclusion

As valued members of the LifeStance team, we collectively uphold the highest standards of integrity and professionalism. This Code of Conduct serves as the foundation for our ethical business practices, supported by comprehensive policies, training, and resources. We trust each Teammate to exercise sound judgment aligned with our Core Values in all situations.

For guidance regarding this Code or any compliance concerns, Teammates are encouraged to consult with their manager, Compliance Teammates, Chief Compliance Officer, Human Resources, or Legal Department. Anonymous reporting is also available through the Compliance Hotline. Together, we maintain a culture of accountability, transparency, and excellence in all aspects of our work.

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