



To Our Colleagues:

LifeStance is committed to operating its behavioral health company 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 (the “Company”) that reflects this commitment and the core values we share that guide our conduct at the Company.

In order to communicate our ethical standards to all Colleagues (as defined below), we have developed this Code of Conduct as part of our Corporate Compliance Program that is intended to communicate our ethical standards to all Colleagues. 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 employee, director, physician, volunteer, officer, vendor and contractor of the Company (referred to in this Code as “Colleagues”) will behave in a manner that reflects a high level of integrity and will assume responsibility for encouraging other Colleagues 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 Colleagues 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 Colleague 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 at the Company. If you have any questions regarding the Corporate Compliance Program or the Code of Conduct, or you encounter any situation which you believe violates the law or our Code of Conduct, you should immediately consult your supervisor and/or the Compliance Officer. You have our personal assurances that there will be no retribution for asking questions or for reporting 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 Colleagues, but also on our continued good judgment, self-discipline, common sense and integrity. I thank you for your contribution in making the Company an organization that demonstrates the ethical and values to which we are committed.

LifeStance Health Group, Inc.

CODE OF CONDUCT

The mission of LifeStance is to inspire and empower the patients, staff and clinicians of LifeStance and the communities we serve, provide the highest quality treatment services to our patients and to create the highest quality practice environment for our clinician partners.

All activities carried out on behalf of LifeStance by its employees, officers, directors, physicians, volunteers, vendors and contractors of the Company (referred to in this Code as “Colleagues”) 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. This Code of Conduct applies to all Colleagues of LifeStance Health Group, Inc. and its affiliates and subsidiaries (“LifeStance”).

Our Values:

The name of the Company, LifeStance, has a direct connection to our mission and values. LifeStance signifies a person’s relationship with what he or she accepts 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:

Integrity and Honesty — in all our actions and decisions.

Compassion — for those we serve.

People — our greatest asset: our employees, our physicians, Board members, officers, vendors, and volunteers.

Excellence — in all we do: customer service, patient care, relationships and organizational performance.

Stewardship — to manage resources prudently and ethically to ensure the future ability to fulfill our mission.

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 ethical standards to be followed by all Colleagues;
- Communicate to all Colleagues the standards they are expected to follow;
- Communicate to Colleagues 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 is the cornerstone of our anti-fraud and abuse initiatives, designed to prevent, identify and correct potential occurrences of non-compliance or unethical activities.

LifeStance’s Code of Conduct must be followed by all Colleagues. No one, no matter what his or her employment position or relationship with the Company, is exempt from the standards in the Code. Failure to comply is a serious matter that may lead to disciplinary action up to and including termination. In addition, Colleagues who violate a specific law may be subject to legal prosecution.

We expect our vendors, contractors and volunteers to follow the highest ethical standards related to Company business and to report any suspected violation of the Code. The reporting mechanisms available to our employees are also available to our directors, officers, vendors, contractors and volunteers.

Board Responsibilities

LifeStance’s board of directors (the “Board”) is responsible for oversight for compliance at the Company. It plays a vital role in setting the tone for compliant and ethical conduct and culture from the top of the organization. Board members must be knowledgeable about and oversee the Compliance Program. Board members will serve as an example to others in the Company for integrity with regard to Company business as a behavioral health care provider.

Compliance Officer, Compliance Committee and Compliance Liaison Responsibilities

The Board has appointed a Corporate Compliance Officer (“CCO”) to direct compliance activities and administer the Corporate Compliance Program. The CCO is available to you to answer questions and provide advice or accept reports about compliance concerns. A Compliance Committee, made up of members of the Board of directors, has been established to assist the CCO, with consultation from senior management. Additionally, the Company has designated a Compliance Liaison in each platform to serve as a connection between the CCO and Colleagues in locations remote from the corporate headquarters. Colleagues may raise questions or report compliance concerns to the Compliance Liaison who will, in turn, report such issues to the CCO. The Compliance Liaisons will assist the CCO with implementation of compliance activities in the remote locations. The CCO, Compliance Committee members and Compliance Liaisons will serve as an example to others in the Company for ethical conduct related to Company business.

Employee Responsibilities

As a Colleague of the Company, you must conform to all laws and regulations that apply to the Company’s business, as well as this Code of Conduct and policies of the Company. To help you comply with the law and these policies, you will be required to attend training at least annually on the Compliance Program and this Code of Conduct, as well as the laws and policies that govern your work related to the Company. You will certify completion of such training. Additionally, you have the duty to report any suspected violation of the Code of Conduct, the Compliance Program, or the law to your supervisor or the CCO by one of the methods described

in this Code of Conduct. LifeStance performs background screening on all Colleagues at hire and periodically to ensure that its Colleagues are not excluded from any federal health care programs and have not been convicted of certain crimes.

The Company maintains an “open door” policy and you should consult with your supervisor or the CCO whenever you have a question related to a compliance or integrity issue or the Compliance Program. You are expected to participate in monitoring and auditing activities and cooperate with the Company in investigations into improper conduct. Your cooperation and compliance with the objectives of the Compliance Program will be considered as part of your employee evaluation process. You may be subject to disciplinary action, including termination, for failing to comply with the Compliance Program policies and procedures.

Supervisor/Management Responsibilities

The Company’s supervisors and managers must be open to Colleagues’ concerns about compliance issues. You should hire and delegate appropriately, taking care not to hire or delegate to individuals with a propensity to commit unethical or illegal acts. It is your responsibility as a supervisor or manager to communicate to your Colleagues the importance of operating in accordance with the high ethical standards outlined in this Code. You are also obligated to train your Colleagues on the legal and ethical standards contained in the Code of Conduct and those uniquely associated with their jobs. You must inform Colleagues that strict adherence to the Compliance Program is a condition of employment or a contractual relationship at the Company. Even if an employee raises an uncomfortable question or criticizes you, be open to the issues and, as needed, seek assistance in addressing them.

As a supervisor or manager, you must be an example for the people who report to you, in your behavior and in your commitment to the Compliance Program. Managers and supervisors must use reasonable diligence to detect a problem and sanctions may be imposed for failure to make such diligent efforts. Managers’ and supervisors’ promotion of, and adherence to, the Compliance Program will be a factor in evaluating the managers’ and/or supervisors’ performance. Similarly, you must consider a Colleague’s compliance with the Compliance Program in evaluating the performance of Colleagues you supervise. The Company will not tolerate retaliation of any kind against a Colleague who reports a suspected Compliance Program violation or raises compliance concerns.

You should report to the CCO any compliance concerns communicated to you by any Colleague so that the concerns/reports can be handled in accordance with Company policies and procedures.

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.

Communicating Issues and Reporting Compliance Concerns

Talk to your supervisor about your concerns. Your supervisor is in a good position to listen to you and understand the concerns you have. Give your supervisor an opportunity to resolve the issue.

If you have raised an issue and you do not think it is getting proper attention or if your supervisor cannot find the appropriate answer, you may relate your concerns to the next management level. All supervisors and managers throughout LifeStance have a responsibility to listen to your concerns and take the appropriate actions to resolve them.

If your supervisor or next-level manager is unable to resolve the issue satisfactorily, or you are not comfortable talking to them, contact any of the following until the issue is resolved to your satisfaction: the CCO, the Human Resources Department, any vice president or any executive officer. Additionally, the Compliance Liaison is available to speak with you regarding compliance concerns. The name and contact information of the Compliance Liaison will be communicated to you by your supervisor and through signs in the remote locations.

The Company takes all reports of potential non-compliance with the Compliance Program or this Code of Conduct seriously and Colleagues can be assured that the Company will look into such reports and investigate credible reports and respond with appropriate action to correct any confirmed problems.

Compliance Resources

Compliance contact numbers are listed below.

- Corporate Compliance Officer - Ryan Pardo / Contact: 800-308-0994
ryan.pardo@lifestance.com
- Chief People Officer – Felicia Gorcyca / Contact: 310-210-6987 /
felicia.gorcyca@lifestance.com
- General Compliance Hotline - 800-308-0994
- Financial Reporting Whistleblower Hotline – 866-454-2201
- Compliance Email - corporatecompliance@lifestance.com

Compliance Hotline and Email

If you do not feel comfortable discussing your concerns directly with your supervisor or one of the compliance contacts we have identified, you may call the Compliance Hotline, toll-free, and we will protect your anonymity to the extent possible. The number is 800-308-0994. This line is not intended to replace your normal reporting process. It is another resource available to you when you have used other routes or do not feel comfortable discussing the issues with your supervisor or manager.

Calls are handled confidentially, and you are protected from any form of retaliation or retribution for reporting a violation. If anyone attempts to retaliate against a Colleague who reports an ethical or legal concern, and the report was made in good faith, the person who retaliated will be subject to disciplinary action, up to and including termination of employment.

All calls received on the Compliance Hotline will be routed to the CCO for handling.

Reporting Privacy and Security Program Questions or Concerns

Issues or suspected violations of LifeStance's Privacy and Security Program (which is aimed at protecting the privacy and security of our patients' medical and personal identifying information) can also be reported to your supervisors or managers, or to the CCO directly or by using the Compliance Hotline at 800-308-0994 or Compliance Email.

Non-Retaliation Policies

Colleagues who report compliance issues in good faith will not be punished in any way for reporting the issue. In addition, you will not be subject to retaliation or intimidation for participating in investigations, audits and corrective actions related to compliance matters. Any Colleague who attempts to retaliate against another Colleague for reporting a compliance issue in good faith will be subject to disciplinary action, including termination if appropriate.

Disciplinary Action for Violations of the Code of Conduct

Colleagues who are found to have violated any of the standards contained in this Code of Conduct may be subject to disciplinary action. The CCO will work in conjunction with Human Resources to recommend to senior management the type of disciplinary action that may be taken. Various factors are considered throughout the assessment and various levels of discipline are considered. All disciplinary actions are taken on a fair and equitable basis.

Application of the Ethical Standards

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.

Compliance with 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. Colleagues are also expected to be aware of and comply with these requirements.

Compliance with Policies and Procedures

In order to define acceptable practices, we have established policies and procedures. All Colleagues are expected to be aware of and comply with LifeStance policies and procedures. Compliance with LifeStance policies and procedures is an element in evaluating the performance of all Colleagues.

Patient Safety and Quality of Care

LifeStance is committed to providing consistently high-quality patient care services without regard to race, color, religion, gender, sexual preference, national origin or disability. 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.

Fair Treatment of Employees/Harassment

LifeStance is committed to providing an environment in which Colleagues are treated with dignity and respect. An environment that is free from all forms of harassment or discrimination helps our Colleagues perform effectively and gain both personal and professional satisfaction from their work. Any form of unlawful harassment or discrimination based upon factors such as race, color, religion or any other characteristic 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.

Workplace Safety

Our employees 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 your manager. If your manager is unavailable, Security or Human Resources should be contacted.

Credentials and Excluded Parties

Only appropriately licensed and credentialed individuals may provide medical care at our facilities. LifeStance will not hire or contract with people or entities that have been excluded from participation in federal or state healthcare programs or been convicted of certain crimes that could result in such exclusion. The Company performs background screening of all Colleagues at time of hiring, contracting or appointment and on a regular basis thereafter.

Conflicts Of Interest

A potential conflict of interest exists when you have the opportunity to benefit personally, beyond the receipt of your paycheck, from an action you are taking as part of your job duties. Potential conflicts of interest come in many forms. For example, let's assume you are responsible for ordering medical supplies and can order those supplies from any one of three suppliers. If your husband or wife sells medical supplies for one of those suppliers and is paid on commission, you have a potential conflict of interest. You may benefit personally by ordering the medical supplies from that supplier. Employees will be asked to complete a conflict-of-interest disclosure form. The form is available electronically through the CCO or someone designated by the CCO. Your manager and, as needed, the CCO will review the information to determine whether an actual conflict of interest exists. To avoid conflicts of interest, you are expected to:

- Serve LifeStance with undivided loyalty and never use your position for personal gain.
- Devote your full time and ability to LifeStance's interests during your regular working hours and for whatever additional time may be properly required.
- Refrain from accepting additional employment or engaging in business activities outside regular working hours if these would tend to impair your ability to meet your regular job responsibilities to the system or conflict or compete with services provided by LifeStance.
- Submit a conflict-of-interest disclosure form or update your existing form as soon as an actual or potential conflict of interest occurs. Disclosures must be updated as soon as a change in the situation occurs.

Conflict-of-Interest Q & A

Q: Does this conflict-of-interest policy apply to all employees, including contractors?

A: Yes, the conflict-of-interest policy applies to all employees including officers and vendors. An employee or officer must disclose his or her employment, contractual relationship or financial relationship, outside of his or her employment or relationship with LifeStance.

Q: I have a job outside LifeStance. Do you mean that I am not allowed to have a second job?

A: Our conflict-of-interest policy means only that you must disclose your second job. Once you have done that, a determination will be made as to whether your second job presents a conflict with your duties and responsibilities at LifeStance.

Q: I disclosed my second job last year. Do I have to do it every year?

A: Our policy requires that you disclose potential conflicts of interest as soon as they arise and when there is a change in circumstances. You must update your form when a new potential conflict arises.

Q: My partner just got a new job with a competing clinic. Do I need to complete the form now or can I wait until next year?

A: A potential conflict of interest must be disclosed as soon as it arises. Complete a form now to report your partner's employment with a competitor.

Incentives to Patients and Improper Payments

LifeStance representatives will not solicit, accept, offer or pay bribes, kickbacks or other illegal incentives for the purpose of personal gain, developing business or any other purpose.

LifeStance employees and representatives must not offer incentives to individuals to use our services, unless such incentives are nominal in value. Such incentives include free services or transportation, discounts, entertainment or other benefits. In no event should any incentive provided to an individual be greater than \$15 per individual gift, nor exceed \$75 annually in total aggregate value. If any state law provides for a lower maximum value for such incentives in a particular situation, then such limits must be followed. Any questions as to whether a gift or incentive is allowed should be directed to the CCO.

Gifts

A vendor is defined as any person or company doing business with or seeking to do business with LifeStance. Except in limited circumstances, the giving or receiving of gifts, other than gifts of nominal value to or from a vendor, is not allowed. This prohibition extends to family members as well. Cash gifts, including gift certificates and gift cards, may never be accepted, no matter what the value.

Noncash gifts of nominal value may be accepted. The guideline used to determine if a gift is of nominal value is \$100. If the value of a gift is over \$100, it is not considered nominal and the gift must not be accepted. In addition, you should consider whether you have received more than one gift from the same source. On an annual basis, the value of gifts received from the same source must not exceed \$300.

Gifts can be in the form of favors, gratuities or other things of value. Discounts for personal items from vendors could be considered a gift and should not be accepted if they are outside of a prearranged LifeStance discount or if they are of more than nominal value.

If you have any questions about whether you can accept a gift from a vendor or referral source, you must discuss the situation with the CCO.

Entertainment

Attending business lunches, meals or events at entertainment venues occasionally as a guest of a vendor, sales representative or other person who does business with or is someone who could potentially do business with LifeStance is allowed. Meals with vendors or potential vendors should be infrequent, and the meals should be of nominal value. Consideration should also be given to other factors such as appearances. For example, the meal should be in an appropriate setting, at an appropriate time.

If you have any questions about whether you can accept a meal or entertainment from a vendor or referral source, you must discuss the situation with the CCO.

Vendor-Sponsored Travel

On occasion, a vendor or potential vendor will offer to pay for an employee or a family member to attend a meeting. This could be an educational program, seminar, user group, speaking engagement, promotional program, meeting, site visit or other activity. LifeStance does not permit vendor-sponsored travel. If the travel has a legitimate business purpose, and is in accordance with our policy on travel expenses, LifeStance will pay for employees' travel.

An employee may accept an invitation from a vendor to attend a social event, meal or other entertainment while traveling, as long as the value meets our definition of nominal and the other guidelines outlined for entertainment.

Honorariums

Management staff may not accept honorariums for speaking engagements. Non-management staff may accept honorariums under limited circumstances. The Colleague's manager must also preapprove the payment to a non-manager.

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 physicians 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 physicians 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.

Prior to entering into any arrangement with, or making any payment to, a physician or other healthcare provider, contact the CCO. All contracts with or payments to physicians must be approved by the CCO, or a lawyer 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.

Physician Referral Prohibitions

LifeStance will not knowingly submit a bill or charge for certain services in which the referring physician (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 CCO, or a lawyer specifically designated for this purpose by the Company, must be obtained prior to establishing a financial relationship with any physician.

Accurate and Timely Charge Entries

Charge entry is among the first steps that contribute to the creation of a bill that will be submitted to a payer for payment. All charges must be supported by the medical record documentation for the patient. Charges must be entered based upon services rendered, rather than upon services ordered. Charges must also be entered within reasonable time frames.

Dealing Honestly With Third-Party Payors

1. Avoiding Fraud and Abuse. The Company specifically prohibits any Colleagues from committing fraud or abuse related to the Company business. Simply stated, fraud is the knowing misstatement of a material fact, made for the purpose of persuading somebody to give something of value, while knowing that “somebody” will rely on the misstatement. One form of fraud is directly telling someone a “fact” that the speaker knows or should know is false.

Fraud can also be committed by not telling someone a fact that should be told to avoid misrepresentation. This is fraud by omission. If, for example, a nurse knows a key piece of information and intentionally withholds it in her documentation, the law says that withholding the key information may be the same thing as lying.

The definition of abuse describes practices that, either directly or indirectly, result in unnecessary costs to the Medicare, Medicaid or commercial insurance programs. There is a fine line between what constitutes outright fraud and what constitutes abuse. The distinction is whether acts have been committed intentionally or knowingly and willfully or merely committed out of simple negligence.

2. Honest, Accurate Billing and Claims Submission. All billings to government, private insurance payors and patients must reflect truth and accuracy and conform to all pertinent federal and state laws and regulations. The Company prohibits any Colleagues 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.

3. Documentation of Services. To avoid allegations of fraudulent claims and to support payment for the services, Colleagues must accurately and completely document clinical and financial/billing information. Colleagues 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.

4. 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. Colleagues 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). Colleagues shall not improperly bill services separately that are required to be billed together (unbundling).

5. Communication to Assure Correct Billing. Clinical and billing staff will communicate with each other, effectively and accurately, to ensure correct billing. Compensation for the billing department coders and billing consultants will not provide any financial incentive to improperly code claims. Diagnosis and procedures reported on reimbursement claims will be based on the clinical record and other documentation.

6. Billing Questions. If you have questions and concerns about documentation, billing and coding, or suspect erroneous or improper billing activity, you must raise your questions and concerns or report the suspected activity to your supervisors. As with any other issue, questions may be pursued up through the chain of command. If you are uncomfortable approaching your supervisor with your concern or question, or if the issue remains of concern after discussion with your supervisor, you may contact the CCO or report the situation using one of the methods described in this Code of Conduct.

False Claims Act

The federal government enacted the False Claims Act (the "FCA") to prohibit the knowing submission of false or fraudulent claims to the federal government, including Medicare. Penalties for violating the FCA can be up to three times the amount of the payment received on the claim, plus additional amounts up to more than \$23,000 per false claim. False claims can also result in exclusion from the Medicare and/or Medicaid programs. Many states have enacted similar laws, which also include penalties for individuals or entities that submit false or fraudulent claims to the state or to Medicaid.

In order to prevent violations of the federal and state FCAs, we have established policies and procedures that reinforce our commitment to high ethical standards when it comes to submitting claims for payment to any payer. Consistent with the FCA, we encourage Colleagues to report to us suspected improper conduct. We protect from retaliation any Colleague who reports to LifeStance a suspected violation. Potential violations may be reported directly to any member of management or anonymously via the Compliance Hotline at 800-308-0994.

The CCO is primarily responsible for investigating allegations of misconduct. The CCO is charged with overseeing the Compliance Program, along with the Compliance Committee and

to assist in the prevention and detection of fraud, waste and abuse. The CCO performs proactive audits, provides training and performs investigations, all under the guidance of the LifeStance Board of Directors.

Record Management

LifeStance has created a policy to provide for the routine and orderly maintenance of records that are needed for legal, financial or operational purposes. The Company has created a records retention schedule that outlines the types of records to be maintained and the retention periods. Documents that pertain to an actual or threatened litigation or investigation are safeguarded and not destroyed.

Confidentiality of Patient Records/ Privacy and Security Program

Our profession requires that we gather a great deal of personal and health information about patients. The Health Insurance Portability and Accountability Act, as amended (“HIPAA”), gives patients and consumers specific rights to privacy and limits the use of individually identifiable health information. Colleagues will become familiar with the Company’s obligations with regard to its patients’ “protected health information” as defined in the HIPAA. The Company has developed policies and procedures in a Privacy and Security Program that define our privacy and security practices to protect protected health information and other personal information about our patients. Patient and Colleague complaints of privacy violations should be reported through the Compliance Hotline at 800-308-0994 or one of the other methods outlined in the Code of Conduct.

You must carefully avoid any unnecessary invasion of the patient’s right to privacy. Patients and their representatives will be accorded appropriate confidentiality. You must strictly safeguard all confidential patient information with which our patients have entrusted us and must never discuss any information outside the normal and necessary course of the Company’s business.

The inappropriate release of patient information in any form may be harmful to the patient and to LifeStance. Confidential patient information may only be disclosed with the appropriate patient authorization or as otherwise allowed by law. Requests for the release of confidential patient information must be directed to your supervisor.

You should be especially aware of your obligation to respect and protect the special confidential nature of records regarding drug abuse, psychiatric conditions, HIV status, alcohol abuse, or other personal information of employees or patients.

You must also protect patient information that, if improperly accessed, could be used to illegally obtain goods, services or cash. This includes health or contact information about a patient or data such as a Social Security number or credit card number. The inappropriate release of patient information may subject you to civil and criminal prosecution, as well as termination from LifeStance.

In order to protect patient information from inappropriate disclosure, you are expected to:

- Limit your access to, and use of, patient information to that required by your duties, permitted by law and authorized by LifeStance;
- Use only legitimate and authorized means to collect patient information and, whenever practical, obtain it directly from the patient;
- Release information concerning patients in drug and alcohol treatment programs and information regarding a patient's HIV status only in accordance with special confidentiality rules and laws that apply to this information;
- Refrain from revealing any patient information unless supported by legitimate business or patient care purposes as defined by LifeStance;
- Refrain from discussing health information with any person inside or outside LifeStance unless it is in connection with your work, permitted by law and authorized by LifeStance;
- Be aware of your surroundings and guard against visitors and third parties needlessly overhearing patient health information; and
- Refrain from removing, sending or electronically transmitting a patient medical record, or a copy, without the authorization of a supervisor or other designated official.

Patients' Rights

You are expected to treat patients in a manner that preserves their dignity, autonomy, self-esteem, civil rights, and involvement in their own care. The Company strictly prohibits any conduct that could be construed to be patient abuse, neglect and exploitation.

We assure patient involvement in all aspects of a patient's care and obtain informed consent for treatment. Patient advance directives will be honored within the limits of the law and the organization's mission, philosophy and capabilities.

Confidentiality Of Business Related Records

All business records of LifeStance are proprietary and confidential, and certain records must be maintained in compliance with the law. Federal and state laws also require that LifeStance maintain certain business records for minimum periods. In addition, LifeStance often has a need to locate various business and corporate records on short notice. Therefore, you must limit your access, use and disclosure of business information and corporate records to that required to perform your duties as an employee of LifeStance. You must not remove or electronically transmit business or corporate records, or copies of such records, from any department of the Company without authorization of the appropriate manager.

Confidentiality/Security of Electronic Records

The availability of electronic records such as medical record information and business records brings with it increased potential for inappropriate access. You are required to take the appropriate actions to safeguard against unauthorized access to electronic records. Passwords

issued to you are for your use only to complete assigned duties. Due care must be taken to protect the confidentiality of passwords assigned to you. In addition, you must take reasonable precautions to protect against unauthorized access to work areas where confidential information may be available or displayed. The Company has developed policies and procedures in a Privacy and Security Program that define our privacy and security practices to protect protected health information. Patient and Colleague complaints of privacy violations may be reported through the Compliance Hotline at 800-308-0994 or one of the other methods outlined in the Code.

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 Public Relations department or to the CCO.

Our internal control procedures are further regulated by the Sarbanes-Oxley Act of 2002. Sarbanes-Oxley was a U.S. legislative response to events at public companies involving pervasive breakdowns in corporate ethics and internal controls over financial reporting. It was designed to rebuild confidence in the capital markets by ensuring that public companies are operated in a transparent and honest manner. Ensuring proper and effective internal controls is among the Company's highest priorities. 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.

Social Media

Social media is a broad term meant to cover the use of technology for social interaction, including the construction of words and pictures. Some examples of social media are Facebook, LinkedIn, Wikipedia, Twitter and blogs. As a Colleague of LifeStance, you have access to all kinds of confidential information, such as business records, patient information and marketing strategies. Colleagues are prohibited from using social media to disclose confidential patient and business information, including the disclosure of photographs. If you use social media and it

indicates that you are associated with LifeStance, you must clearly specify that any opinions expressed are your own and not those of LifeStance. All external representations of LifeStance must first be authorized by the Public Relations department or the CCO and must comply with the Company's Regulation FD Policy.

Marketing and Public Relations

LifeStance's marketing and public relations information is truthful and is not intended to mislead. Claims about LifeStance services are based on facts. No marketing activities will involve any illegal or improper payment for referrals or inducements to patients for Company business.

Safeguarding Assets

You are personally responsible and accountable for the proper use of the Company's funds and property. You are responsible for taking measures to protect computer systems and networks from unauthorized use, access or modification of software. LifeStance also requires Colleagues to protect patient and other customer property and information to the extent possible. Unauthorized use of LifeStance property is considered theft.

You are expected to:

- Be personally responsible and accountable for the proper expenditure of LifeStance's funds and the proper use of its property.
- Use supplies, equipment and property bought and owned by LifeStance for business purposes only.
- Use computer systems' software and hardware that LifeStance owns or operates to conduct business.
- Follow the requirements of software copyright licenses and corporate policies on software usage.
- Dispose of surplus, obsolete or junked property in accordance with our policies and procedures. Unauthorized disposal of property is a misuse of assets.

The use of a LifeStance computer does not guarantee personal privacy.

Requests for Information - Regulatory/Government Agencies

All requests for information from any regulatory or government agency must be complied with in an accurate and timely manner, following the laws and regulations that apply. Any nonroutine request, such as a subpoena, affidavit, warrant or letter from a regulatory or government agency must be immediately referred to the CCO. Any notification of a violation or citation from a government agency that alleges a violation related to the topics covered by this Code of Conduct must be referred to the CCO for immediate attention.

We will cooperate with all valid and appropriate government inquiries or investigations concerning the legal or business practices of LifeStance. Colleagues should not obstruct any government request for information, audit or investigation of LifeStance.

You must fully cooperate with all internal and external audits conducted, including Compliance Program audits and investigations.

You are not permitted to alter, remove, or destroy documents or records of the Company that are related to matters under investigation. This includes paper and computer records.

Amendments and Waivers to the Code of Conduct

LifeStance does not typically grant waivers of any Code of Conduct provision but may grant a waiver in limited and compelling circumstances. Please contact the CCO if you believe that a waiver under a provision of this Code of Conduct is warranted. Approval by the CCO and Chief Executive Officer is required to grant a waiver hereunder with respect to LifeStance employees other than executive officers. The Board of Directors must approve a waiver for any director or executive officer, and such waiver must be disclosed to the public as required by law or stock exchange regulation.

In Conclusion

You are a valued Colleague of LifeStance and we appreciate our relationship with you. Please talk to your manager, Compliance Liaison or the CCO if you have any questions about this Code or concerns about compliance issues.