

Ethos Technologies Inc. Code of Conduct

A MESSAGE FROM OUR FOUNDERS

Our Commitment to You,

As the founders of Ethos, we believe in creating a workplace where everyone feels valued, respected, and empowered to contribute their best every day. We have built Ethos on a foundation of four core values which serve to differentiate us in the marketplace: Serve our Families, Intellectual Rigor, Bias for Impact, and Speak your Mind.

We believe that these core values are essential for us not only to excel but also to create a positive and productive work environment. This Code of Conduct is based upon our core values and outlines the standards of behavior we expect from everyone here at Ethos, regardless of role or position, as we work to protect the next million families.

We want you to feel comfortable raising concerns and asking questions. To that end, multiple opportunities to provide feedback and raise concerns are available to you and referenced in this Code. While we have intentionally designed the appearance of our Code of Conduct to make it more fun, accessible, and easy to understand, please know the fundamental message and expectations remain serious and very important.

Thank you for being a part of our team and for your ongoing commitment to upholding our core values and this Code of Conduct.

Sincerely,



Peter Colis, CEO & Founder
August 28, 2024



Lingke Wang, President & Founder
August 28, 2024

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WHAT IS THE PURPOSE OF THE CODE OF CONDUCT?

The Code provides guidance to employees, including executive officers, and members of the board directors of Ethos Technologies Inc. and its subsidiaries (collectively, "Ethos" or the "Company") on the ethical and professional standards expected of them in the course of their work. The Code supports a culture of integrity, compliance and accountability, and ensures that all employees and directors act in the best interests of the company and its stakeholders. While this Code covers a wide range of business activities, practices, and procedures, it does not cover every issue that may arise in the course of Ethos' business activities. Rather, it sets out basic principles designed to guide Ethos' employees and directors. Consultants, vendors, and contingent, contract, or temporary workers are expected to comply with the principles of this Code and policies applicable to their location, function, and status.

SCOPE: WHO MUST FOLLOW OUR CODE?

Every Ethos employee, including executive officers and members of the board of directors is responsible for upholding high ethical and professional standards and must seek to avoid even the appearance of improper behavior. This Code sets ethical and professional standards for our behavior and decision-making. We must follow laws, policies, and treat clients and colleagues with respect. Any violation of this Code may result in disciplinary action to the extent permitted by applicable law, including termination of employment. Moreover, while the Code of Conduct is specifically written for Ethos employees, including executive officers, and members of the board of directors, we expect members of our extended workforce (temporary workers, vendors, and independent contractors) to follow the Code in connection with their work for us. Failure of a member of our extended workforce or other covered service provider to follow the Code of Conduct can result in termination of their relationship with Ethos.

OUR CORE VALUES

Ethos has a set of standards for how we operate and behave which are outlined in our Core Values:

- **SERVE OUR FAMILIES:** Act with integrity. Delight the customer.
- **INTELLECTUAL RIGOR:** First-principles thinking. Be data informed.
- **BIAS FOR IMPACT:** Win by overachieving. Think big and start small.
- **SPEAK YOUR MIND:** Strong opinions, loosely held. One team, one dream.

SERVE OUR FAMILIES

We are committed to acting with integrity and treating our customers fairly, safeguarding their private information, and securing their data and information. We also strive to use artificial intelligence and social media responsibly and ethically.

TREATING CUSTOMERS FAIRLY

We prioritize our customers and strive to both delight them and meet their needs by personalizing their experience and anticipating their future requirements. We hold ourselves to high ethical standards, act professionally and respectfully, and promptly respond to customer inquiries. We use fair and honest practices in all our interactions with customers and deliver on our promises. We have clear guidelines for marketing and selling our products. Customer complaints are promptly addressed in accordance with company policies and applicable laws.

SAFEGUARDING PRIVATE INFORMATION

At Ethos, our customers, employees, and business partners provide personal information to Ethos everyday. They rely on Ethos to protect that information, as well as to respect their privacy. As part of Ethos' commitment to meeting these expectations and to transparency, we have established controls and standards to ensure that all data collected, used, stored, transferred, and secured is done in accordance with applicable laws and regulations. We expect everyone associated with Ethos to help prevent cyberattacks and privacy breaches by following our data protection policies. We protect personal and sensitive information and inform our customers, employees, and business partners about our privacy practices through various channels, including privacy notices and online privacy statements. We are committed to ethical data collection and use through trustworthy and sustainable data practices. For more details or to make a privacy request visit: <https://privacy.ethoslife.com/policies>

Securing data & information

We take the security of our data and information seriously. We have implemented strict measures to protect against unauthorized access, use, disclosure, disruption, modification, or destruction of data. We also require all employees and associates to follow our security policies and procedures to ensure the confidentiality, integrity, and availability of our data and information. Employees are required to report any security violations and issues to security@getethos.com.

ARTIFICIAL INTELLIGENCE

We use AI to create and preserve value for our customers, employees, and investors. Our Ethical Principles for the Use of Artificial Intelligence provide the foundation for trust and transparency throughout our design, development, purchase, validation, deployment, use, and monitoring of AI. We are committed to ensuring that our use of AI is transparent, fair, and unbiased. For more information, please refer to the Ethical Principles for the Use of Artificial Intelligence.

SOCIAL MEDIA USAGE

We recognize the importance of communicating through social media platforms. While social media can be an effective way to connect with others, it must be done in compliance with all applicable laws, rules, and regulations, the policies and terms of the online/social networking venue, and Ethos policies, standards, and guidelines, our Corporate Disclosure Policy, as well as our Anti-Discrimination, Anti-Harassment, and Non-Retaliation policies. If you see or receive concerning or inaccurate posts about our business or affairs, please contact the Ethos Compliance team at Compliance@getethos.com. Do not respond directly and for any malicious or suspicious online activity please reach out to security.talk@getethos.com. For more information, consult Ethos' policies on social media, digital communications and acceptable use.

INTELLECTUAL RIGOR

We compete with integrity and rely on data to manage risk, avoid conflicts of interest, protect our assets, manage gifts and entertainment responsibly, refuse to take bribes or pay kickbacks, prevent money laundering, communicate responsibly, and engage third parties with integrity.

COMPETING WITH INTEGRITY

At Ethos, we believe in competing with integrity. This means that we don't engage in any conduct that interferes with free and fair competition or violates antitrust and unfair competition laws. We also don't use, disclose, or obtain any confidential information from our competitors, except through proper benchmarking or other approved methods that comply with antitrust policy. Additionally, we respect the intellectual property rights of others.

MANAGING RISK

When it comes to managing risk, we take it very seriously. As a company that sells and administers insurance products, we are committed to understanding, identifying, and mitigating risks that may arise from our services. We have a team of experts across the organization who rely on data and collaborate to analyze potential outcomes to effectively manage risk. We also regularly review and assess our risks and mitigating controls. At Ethos, we expect everyone to communicate and escalate any questions or concerns about the risks we are taking or how we are managing them. You can reach out to Compliance@getethos.com if you have any concerns or need further guidance.

AVOIDING CONFLICTS OF INTEREST

At Ethos, we are committed to avoiding conflicts of interest, or even the appearance of a conflict of interest, and acting in the best interests of the company. We require all employees, including executive officers, and members of our board of directors, and associates to disclose any activities, interests, or affiliations that may conflict with the interests of Ethos, our customers, or stakeholders. This could include personal investments, business dealings, relationships, political contributions, second jobs, sitting on a board, or any outside activities that may impact their ability to make impartial business decisions. We encourage all to consult with their manager or Ethos' Legal Team (Legal@getethos.com) if you have any questions or concerns about potential conflicts of interest. Please review our conflicts of interest policies for more information.

PROTECTING OUR ASSETS

We are committed to protecting our assets, which includes everything we own or use to conduct business. Employees and associates are responsible for safeguarding these assets from loss, damage, theft, waste, and improper use. Protecting proprietary information and assets is crucial for maintaining our reputation and meeting our customer obligations. Confidential, proprietary, and sensitive business-related information must not be shared externally without proper authorization. If there is a need to share such information, employees should always discuss the matter with their manager and escalate to the Legal department before making any disclosures. This ensures that we comply with ethical standards, laws, and preferred business practices when engaging in business-related communications. Please review our policies on digital communications and acceptable use.

MANAGING GIFTS AND ENTERTAINMENT RESPONSIBLY

At Ethos, we understand that giving and receiving gifts or entertainment can be a common part of doing business. However, it's important to ensure that these exchanges don't create a conflict of interest or suggest anything improper. That's why we expect all employees to follow our guidelines for managing gifts and entertainment, and to avoid any actions that could be perceived as unethical or give us an unfair advantage. We also have guidelines for political contributions and entertaining politicians and government officials, which require pre-approval using this form.

REFUSING TO TAKE BRIBES OR PAY KICKBACKS

Ethos has a zero-tolerance policy towards bribery and corruption. All employees and representatives are responsible for understanding and complying with our policies, the Foreign Corrupt Practices Act, and applicable local anti-bribery and anti-corruption laws. We are committed to conducting our business with integrity and refuse to take or offer bribes or kickbacks.

PREVENTING MONEY LAUNDERING

Ethos recognizes the importance of protecting the integrity of the global financial system from money laundering, terrorist financing, and other financial crimes. The company will comply with all applicable governmental requirements that have been designed to prohibit and prevent both actual and potential money laundering, as well as other activities that facilitate money laundering, the funding of terrorist activity, and other financial crime. Ethos will not knowingly deal with proceeds from unlawful activity or that support terrorist activities. Ethos will not deal with individual's, entities, or restricted countries designated by the U.S. Department of Treasury Office of Foreign Assets Control ("OFAC") and similar applicable sanctions regulations in other countries where the company operates.

RECORDKEEPING

It is Ethos's policy to make full, fair, accurate, timely and understandable disclosures in compliance with applicable laws and regulations in all reports and documents that Ethos files with, or submits to, the U.S. Securities and Exchange Commission, U.S. state agencies, and in all other public communications made by Ethos.

The integrity, reliability and accuracy in all material respects of Ethos's books, records and financial statements are fundamental to Ethos's continued and future business success. In addition, as a company whose stock is publicly-traded, Ethos is subject to a number of laws and regulations that govern our business records, including U.S. securities laws. Ethos must record its financial activities in compliance with all applicable laws and accounting practices and provide current, complete and accurate information to any and all government agencies. None of us may cause Ethos to enter

into a transaction with the intent to document or record it in a deceptive or unlawful manner. In addition, none of us may create any false or artificial documentation or book entry for any transaction entered into by Ethos. Similarly, anyone who has responsibility for accounting and financial reporting matters has a responsibility to accurately record all funds, assets and transactions on Ethos's books and records.

COMMUNICATING RESPONSIBLY

We expect all employees to use digital communications and internet connections in a lawful and ethical manner, consistent with company policies and standards. Personal electronic devices connected to our systems must also follow these policies when acting on behalf of Ethos. Privacy is not guaranteed when using companies' systems.

Only authorized employees may communicate on behalf of Ethos, and media requests should be directed to Ethos Communications at Ethos Communications@getethos.com. We are committed to communicating responsibly, ensuring that all communications are accurate, truthful, and not misleading. For additional information on our marketing guidelines please contact Compliance at Compliance@getethos.com.

In addition, any such communications must also be considered in light of the relevant sections of our Corporate Disclosure Policy.

ENGAGING THIRD PARTIES

We engage third parties with integrity and ensure that business dealings are consistent with our Core Values and ethical standards. We require third-party arrangements that are negotiated and in the best interests of Ethos, and we expect third parties to conduct themselves with high standards of ethics and integrity. We have defined a framework and requirements for a comprehensive program to effectively and consistently manage risks throughout the third-party life cycle. Consistent with our values, we expect all contractors, consultants, and vendors to conduct themselves with the same level of honesty and integrity in the provision of all goods, services, and business activities undertaken for the company.

BIAS FOR IMPACT

We think big and start small as we promote an ethical, safe, and healthy work environment and are committed to human rights.

PROMOTING AN ETHICAL WORK ENVIRONMENT

We are committed to fostering a work environment that upholds the highest standards of integrity and compliance.

We expect everyone to communicate and escalate any questions or disagreements about risks and ethical concerns. We also provide training and resources to help employees make ethical decisions and behave in a responsible manner.

PROVIDING A SAFE AND HEALTHY WORK ENVIRONMENT

Ethos is dedicated to creating a safe and healthy work environment for all employees. We comply with all relevant regulations and provide guidelines and training to ensure that everyone associated with Ethos knows how to maintain a safe and healthy workplace. We also encourage employees to report any safety concerns or incidents to their manager or to the People team directly.

ETHOS' COMMITMENT TO HUMAN RIGHTS

Ethos is committed to supporting and respecting human rights in all of our operations. We believe that everyone should be treated with dignity and respect, and we will not tolerate any form of discrimination, harassment, or abuse. We also expect our business partners and suppliers to uphold the same standards and to take appropriate steps to prevent human rights abuses in their own operations.

SPEAK YOUR MIND

We have strong opinions, loosely held, which enables each of us to lead by example, seek guidance and report concerns, speak up without fear, and make the right decisions. In the end we are one team with one dream.

LEADING BY EXAMPLE

All Ethos directors and managers have a greater responsibility to lead by example and be role models for their teams. We expect all people managers to role model ethical behavior, create a work environment where ethical behavior is expected, promote and protect our brand and reputation, make business decisions based on high ethical standards, establish and maintain effective controls and procedures, recognize and reward ethical behavior, foster a speak-up culture, and hold team members accountable for completing required company training.

SPEAKING UP WITHOUT FEAR

We know it takes courage to come forward and share concerns. Consistent with relevant legal protections, Ethos strictly prohibits retaliatory, threatening, or harassing acts against anyone for reporting in good faith reasonably suspected unethical or unlawful behaviors or practices, and anyone in good faith participating in an investigation. These protections include whistleblower activities.

WHISTLEBLOWER PROTECTION

Ethos encourages employees to report suspected violations of this Code, company policies, or other state, federal, or local laws and regulations, and will not retaliate against employees who do so in good faith. Any employee who believes that they have witnessed or been subjected to a violation of this Code, laws, regulations, or other ethical concerns, should report the matter to their supervisor, Human Resources, or the Ethics Hotline.

HOW TO RAISE AN ETHICAL CONCERN: ETHICS AND COMPLIANCE HOTLINE

WHAT IT IS

An anonymous reporting system to ensure a high ethical and compliant work environment. This system, called AllVoices, allows anyone to confidentially report ethical or compliance concerns. Whether you witness a violation of a law, regulation, or internal Ethos policy (like misuse of funds, harassment, or discrimination), you can report it anonymously 24/7.

HOW TO REPORT

- **Web Portal:** Submit a report anonymously ([click here](#)).
- **Phone:**
 - U.S. DIRECT ACCESS: 888-483-8095
 - INDIA DIRECT ACCESS: 000 80008-20106

WHAT TO REPORT:

Q: *WHAT IF I'M UNSURE WHETHER SOMETHING IS AN ETHICAL CONCERN?*

A: IT'S ALWAYS BETTER TO REPORT SOMETHING YOU ARE CONCERNED ABOUT, EVEN IF YOU HAVE DOUBTS.

NOT FOR:

- Emergencies - call 911.
- Regular HR issues - use existing Ethos HR processes.

ABUSIVE CONDUCT

Ethos considers abusive conduct in the workplace unacceptable and will not tolerate it under any circumstances. Abusive conduct means malicious conduct of an employer (including management and supervisory personnel) or employee in the workplace that a reasonable person would find hostile, offensive, and unrelated to an employer's legitimate business interests. Abusive conduct may include repeated infliction of verbal abuse, such as the use of derogatory remarks, insults, and epithets, verbal or physical conduct that a reasonable person would find threatening, intimidating, or humiliating, or the gratuitous sabotage or undermining of a person's work performance. A single act will generally not constitute abusive conduct, unless especially severe and egregious.

Employees should report any abusive conduct to a supervisor or manager with whom employees are comfortable speaking. Abusive conduct may also be reported directly to the People team or through the Ethics and Compliance Hotline. For more extensive reporting steps and guidance, please refer to the company's Employee Handbook. Supervisors and managers are to assume the responsibility to ensure employees are not subjected to abusive conduct. All complaints will be treated seriously and investigated promptly. During the investigation process Ethos will attempt to maintain confidentiality to the fullest extent possible. It is a violation of Company policy to retaliate or otherwise victimize an employee who, in good faith, either makes a complaint or assists in the investigation of the abusive conduct allegation.

MAKING THE RIGHT DECISIONS

When we encounter a challenging decision or are uncertain about what to do, following these steps can guide us in making the right decision and preserve the trust placed in us because at Ethos, we are dedicated to making decisions that are ethical and in the best interest of our company, customers, and stakeholders.

STOP

Before taking any action, take a moment to consider the situation and gather your thoughts.

EVALUATE

Assess the potential consequences by asking questions such as:

- Does it align with laws and policies?
- Is it beneficial for our customers, company, employees, and stakeholders? •
- Would it be acceptable if everyone did it?
- Would I feel proud if this action was publicized?

CONSULT

If any of the answers are no, discuss the situation promptly with Compliance for guidance.

ACT

Implement a solution based on the advice received, ensuring it aligns with Ethos' values and policies.

ADMINISTRATION OF OUR CODE

OUR POLICIES

Ethos maintains a well-controlled operating environment, including a series of formal policies and procedures, to ensure that all persons operating on behalf of Ethos remain in compliance within our ethical work environment expectations. Policy scope can extend to family members such as conflicts of interest. Complying with all internal policies is crucial to our ability to make the right decisions and fulfill our purpose.

DISCIPLINARY ACTION

Ethos uses disciplinary actions to promote growth that will develop job performance. These actions are always to treat all employees fairly and with respect. This policy ensures that all employees, including executive officers, members of our board of directors, and third-parties acting on our behalf, are held to the same high standards of ethical behavior. Conduct that is inconsistent with the Ethos Code of Conduct and policies, regulations, or laws may lead to corrective action. Corrective action may be in the form of a written or oral reprimand, notice(s) of inadequate job performance, suspension, discharge, or in any combination of the above, up to and including termination, if Ethos so elects. For more details on disciplinary action please refer to the Ethos Employee Handbook.

VOLUNTARY REPORTING TO GOVERNMENT AGENCIES

All individuals who are subject to this Code of Conduct and Ethos policies may voluntarily communicate with or provide information to government agencies regarding potential violations of law without providing notice to or obtaining approval from Ethos. Nothing in this Code of Conduct is intended to or should be interpreted to preclude any individual from exercising these rights.

WAIVERS OF CODE

Any waiver of this Code must be made only by Ethos' Board of Directors or a Board committee and will be promptly disclosed if and as required by applicable securities law and/or stock exchange rules.

Editor (Full Name)	Reviewed/ Revised Date (MM/DD/YY)	Approved By (Full Name)	Approval Date (MM/DD/YY)	Description of Change	Version Number
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