

Conflicts of Interest

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Purpose

CareMax is dedicated to conducting its activities in a professional and ethical manner, and is committed to identifying, managing, reducing, and/or eliminating actual or perceived Conflicts of Interest that may impact its business operations.

It is the intent of CareMax to promote transparency in its business dealings in order to identify actual or perceived Conflicts of Interest so they may be collaboratively addressed when necessary. A real or perceived Conflict of Interest may often be present where no improper conduct or unethical behavior is involved.

This policy was developed to provide guidance to CareMax on a variety of potential Conflicts of Interest that may arise and to describe the procedures that have been adopted to address actual or perceived Conflicts of Interest. It is the goal of CareMax to comply with all applicable federal and state law, rules and regulations, and ethical obligations regarding Conflicts of Interest.

Scope

This policy applies to CareMax, Inc., its subsidiaries, and affiliates (collectively, "CareMax").

Policy

General Policy Statements

- All Covered Individuals must comply with the requirements of this policy related to potential conflicts for themselves or immediate family members. Covered Individuals will follow the specific procedures listed in this policy based on their category of engagement with CareMax.
- All individuals and departments assigned responsibilities for procedures outlined in this policy are required to comply with this policy.
- CareMax leaders must only take official actions when in good faith, in the best interest of CareMax, and free from influence by their own or their family's personal interests.

Certain Relationships and Transactions That May Raise Disclosure Questions

- **Service as Board Member, Officer, or Employee of a Competing Company:** Covered Individuals shall not accept any position as a trustee, officer, employee, or paid consultant of any company that is considered a competitor of CareMax without informing the Chief Compliance Officer and/or General Counsel and seeking the approval of the CareMax Chief Executive Officer.
- **Gifts and Entertainment:** No Covered Individual shall accept gifts or entertainment from persons or entities that conduct business with CareMax if the gifts or entertainment is for the purpose or perceived to influence business transactions with CareMax. Gifts of cash or cash equivalents are never permissible. This policy is not intended to prohibit the exchange of social amenities or business courtesies that are consistent with good taste and reasonable judgment; however, any acceptance of gifts or entertainment must be in accordance with applicable laws and CareMax policy.

All approved gifts of greater than nominal value must be reported by Covered Individuals in accordance with this policy. Please refer to the *CareMax Vendor Gifts and Business Courtesies* policy for further information related to the acceptance of gifts.

Any question as to whether a particular gift or entertainment may be appropriate in a specific circumstance may be directed to CareMax Chief Compliance Officer at

teresa.mcmeans@caremax.com / 786-206-8721 or anonymously via the Compliance Hotline at 1-800-672-3039 or online at reportanissue.com/caremax.

- **Confidential and Inside Information:** All Covered Individuals shall refrain from transmitting any knowledge, consideration, decision, or any other information that might be prejudicial to the interests of CareMax to any person other than in connection with the Covered Individual's discharge of his/her/their responsibilities on behalf of CareMax. The governing principle is that no material confidential information pertaining to CareMax or its patients may be used for a Covered Individual's own or his/her/their Family's benefit nor shall any Covered Individual disclose such information to others for his/her/their personal use.
- **Use of CareMax Assets:** CareMax's credit purchasing power shall not be used to purchase goods and/or services for personal benefit or non-CareMax activities, except as allowed as a designated employee benefit. CareMax facilities may be used only for CareMax business-related purposes.
- **Conflict of Commitment:** Covered Individuals employed by CareMax are expected to devote their primary professional loyalty, time, and energy to, as applicable, teaching, research, patient care, and service on behalf of, or to, CareMax. Outside activities must be arranged so as not to interfere with the primacy of these commitments. By way of example, outside activities may include, but are not limited to, service for, or on behalf of, state or national commissions, government agencies and boards, and committees or advisory groups to other healthcare companies. Such activities require notification to the appropriate manager and must be disclosed via the disclosure survey.
- **Paid Honoraria and Consultancy:** All Covered Individuals who are employees of CareMax are expected to notify their manager in advance of receiving paid honoraria or consultancy from any company that does business with, may seek to do business with, or competes with CareMax and must disclose any such arrangements via the disclosure survey. When considering requests for approval of paid honoraria and consultancy for employed Covered Individuals, managers shall consider the risk of interference with the primacy of an employee's commitments to CareMax, any potential for conflicts of interest, as well as any potential conflict with the CareMax Mission or Code of Conduct, and applicable policies and laws.
- **Disclosure of Individual Interest Prior to Approval of Transaction:** A Covered Individual must promptly disclose his/her/their interest in, or connection with, a proposed transaction or other matter being presented for consideration or approval to CareMax if the transaction or matter is of the type that would require disclosure on the survey.

Note: Certain states, including California, Connecticut, Massachusetts, Minnesota, New Jersey, and Vermont, have additional laws that limit transactions between certain manufacturers and physicians.

Procedure

1. DISCLOSURE SURVEY DEPLOYMENT MECHANISM

- a. CareMax employs an electronic Conflict of Interest (COI) management database for the deployment, collection, tracking, and documentation of COI-related activities for most Covered Individuals.
- b. In the event that an individual is a member of more than one group of Covered Individuals, the individual will only be required to complete one disclosure survey related to all positions held by the individual.
- c. The Chief Compliance Officer (or designee) will distribute COI disclosure surveys to all new Covered Individuals on an ongoing basis.

- d. The Chief Compliance Officer (or designee) will deploy COI disclosure surveys to all Covered Individuals annually.
- e. Surveys may also be completed on paper at any time using the survey included in the Appendix of this policy.

2. IDENTIFICATION AND MAINTENANCE OF COVERED INDIVIDUALS

- a. When applicable, the CareMax General Counsel shall provide to the Chief Compliance Officer the information for any new Board members and Board Committee members so that an initial COI disclosure survey may be deployed.
- b. On an ongoing basis and when applicable, the Human Resources Department shall provide to the Chief Compliance Officer the information for all new employees who are Covered Individuals so that an initial COI disclosure survey may be deployed.

3. SURVEY COMPLETION AND REVIEW PROCESS

- a. Disclosure surveys are expected to be completed and submitted within 30 days of receipt.
- b. The Compliance Department will track receipt of completed disclosure surveys and provide regular updates to leadership to resolve any outstanding surveys.
- c. Completed surveys with reported disclosures shall be initially screened by the Chief Compliance Officer for any real or perceived conflicts which may require a COI Management Plan. Surveys with real or perceived conflicts which may require management will be escalated for further review by the Chief Executive Officer, the General Counsel, and/or the Chair of the Board of Directors (or designee) as necessary. The review group shall develop a COI Management Plan that addresses the specific issue of concern for the involved individual as appropriate.

4. CONFLICT OF INTEREST MANAGEMENT PLANS

- a. The primary methods of controlling or managing, reducing, or eliminating conflicts shall include:
 - i. Modifying the employment/contractual responsibilities of the Covered Individual;
 - ii. Decrease the risk of a potential conflict by reducing or altering the leadership role, secondary commitment, or financial interest (e.g., partial divestiture or sequestration of one or more financial interests, reduction of time spent in furtherance of one or more leadership roles or secondary commitment); eliminating the conflict by eliminating the leadership role, secondary commitment or financial interest (e.g., total divestiture or sequestration of one or more financial interests, resignation from one or more leadership roles or secondary commitment). In the event a Covered Individual disagrees with the COI Management Plan, the Covered Individual may provide a written appeal which details their position to the Chief Compliance Officer and General Counsel for review. The Chief Compliance Officer will provide a summary of COI Management Plans in reports provided to the Operations Compliance Committee and Compliance Committee of the Board of Directors.

5. ADDITIONAL REPORTING THROUGHOUT THE YEAR

- a. If a Conflict of Interest or potential Conflict of Interest is identified by a Covered Individual during the year, he/she/they must provide a disclosure to the Chief Compliance Officer at

teresa.mcmeans@caremax.com / 786-206-8721 and/or update his/her/their annual COI survey.

6. AUDIT

- a. The Chief Compliance Officer (or designee) may perform audits of Covered Individual disclosure surveys for the purpose of verifying whether (1) the disclosure survey is on file as per instructions in this policy; and (2) the individual truthfully and accurately disclosed his/her/their leadership roles, secondary commitments, and financial interests. Any discrepancies identified during an audit will be discussed with the Covered Individual and if necessary, brought to the attention of the Chief Executive Officer and/or the General Counsel, as necessary.
- b. Annually, the Chief Compliance Officer (or designee) will review the Centers for Medicare & Medicaid Services (CMS) Open Payments Database against the COI management database. Any discrepancies identified during the review will be brought to the attention of the Chief Clinical Officer or designee, as necessary, and addressed appropriately according to the circumstances.

7. RECORD RETENTION

- a. All disclosure surveys will be maintained for a period of not less than six (6) years.

8. VIOLATIONS OF THE CONFLICT OF INTEREST POLICY

- a. Prompt, appropriate, and equitable corrective action will be taken concerning any activities considered to involve an inappropriate Conflict of Interest.

Definitions

Conflict of Interest (COI): a potential Conflict of Interest arises as a result of situations or circumstances whenever an individual's professional interests, such as professional obligations or judgment owed to CareMax and its constituencies are compromised by, or could be perceived as being compromised by, his or her roles, secondary commitments or Financial Interests (defined).

Conflict of Interest Management Plan: a plan designed to manage, reduce, or eliminate potential and/or actual Conflict of Interest. Such plans may include, but are not limited to, the following: (i) public disclosure (e.g., publications, presentations); (ii) restrictions on equity; (iii) limiting the individual's role and responsibilities; (iv) increased oversight; (v) divestiture; (vi) termination of relationships.

Covered Individual means any of the following individuals: members of the Board of Directors of CareMax, Inc. and members of any CareMax entity Board of Directors; voting members of a committee of the CareMax, Inc. Board of Directors or a committee of a CareMax, Inc. entity Board; individuals designated to have significant roles in the management or administration of the business for CareMax and its entities (for purposes of this policy, center administrators and individuals holding the title of Director and above on the organizational chart); employed physicians and advanced practitioners.

Financial Interest: anything of value including, but not limited to, salary or other payments for services (e.g., consulting fees, honoraria, loans, leases); equity interests (e.g., stocks, stock options, partnership interests); intellectual property rights (e.g., patents, copyrights, royalties, licenses); and service (whether compensated or unpaid) as an officer, manager, or member of a board of directors, or other fiduciary or managerial role, or other special relationship with a business partner that has the potential for material gain. If the financial interest is the ownership of securities which are publicly traded, such interest must be disclosed if the combined holdings of the securities of both the affected person and his/her/their

immediate family constitute a greater than 5% interest.

Immediate Family: For purposes of this policy, any child, stepchild, grandparent, parent, stepparent, spouse, sibling, mother-in-law, father-in-law, son-in-law, daughter-in-law, brother-in-law, or sister-in-law of the Covered Individual and any person (other than a tenant or employee) sharing the household of the affected individual.

Open Payments Database: A federally mandated program, available at <https://openpaymentsdata.cms.gov/>, which houses publicly accessible datasets of payments that reporting entities, including drug and medical device companies, make to covered recipients such as physicians, physician assistants, and nurse practitioners.

Vendor (or Potential Vendors): any individual, business, partnership, corporation, or other entity that sells or conveys goods or services to CareMax, or that purchases goods or services for CareMax.

Contacting Compliance or Making a Report

You may use any of the following means to make an inquiry, or make a report on suspected or actual non-compliance of fraud, waste, or abuse without fear of retaliation:

- Reach out to your immediate supervisor
- Contact the CareMax Compliance Team at: Compliance@CareMax.com
- Contact the CareMax Chief Compliance Officer at teresa.mcmeans@caremax.com / 786-206-8721
- Call the confidential and anonymous 24/7 Compliance Hotline at 1-800-672-3039 or make a report online at <https://reportanissue.com/caremax>

Reference

- CareMax, Inc. Code of Business Conduct and Ethics
- Conflict of Interest Management Plan Template
- CareMax Vendor Gifts and Business Courtesies Policy

Change Log

Version	Major/Minor Revision?	Date	Name	Comments
1.0	Major	October 3, 2022	Chief Compliance Officer	Original Version
2.0	Major	September 11, 2023	Chief Compliance Officer	Added information on the CMS Open Payments Database. Added reference to COI Management Plan template. Updated survey language.



APPENDIX A: CONFLICT OF INTEREST DISCLOSURE SURVEY

Name and Title (Please Print): _____

Telephone and Email Address: _____

DISCLOSURE SURVEY

With regard to any entity that does business with, is in competition with, and/or seeks to conduct business with CareMax, Inc., its subsidiaries, or affiliates, do you or an immediate family member participate in or have any of the following?

(Please keep in mind entities that develop and/or manufacture products that are or may be purchased or used by CareMax, including pharmaceutical and medical device companies.)

a. Financial Interest (e.g., ownership or investment) _____ No _____ Yes

If yes, please describe: _____

b. Compensation or Employment Arrangement _____ No _____ Yes

Please consider arrangements with pharmaceutical, medical device, and biotechnology companies, whether compensated directly by the company in question or through a third party. For these relationships, indicate total compensation received during the last year in relation to speaking fees, participation in industry advisory boards, research, consulting, travel, food and beverage, and gifts.

If yes, please describe: _____

c. Position of Influence (e.g., serve on a board) _____ No _____ Yes

If yes, please describe: _____

d. Intellectual Property Rights (e.g., patents, copyrights, royalties) _____ No _____ Yes

If yes, please describe: _____



e. Involvement in clinical research services (e.g., supervising, contracting, budgeting)

_____ No _____ Yes

If yes, please describe: _____

f. Receipt of any gifts worth, in total, more than \$50 (including cash, cash equivalents gratuities, entertainment or other favors)

_____ No _____ Yes

If yes, please describe: _____

g. Any other activity/interest that may be, or may be perceived to be, a potential conflict of interest

_____ No _____ Yes

If yes, please describe: _____

CERTIFICATION

I certify that the provided information in this disclosure survey is true, accurate, and complete to the best of my knowledge.

I understand that I have an obligation to update the information on this form when there is a change in any of the information I have provided in this disclosure survey.

Signature: _____ Date: ____/____/____

If you have any questions, please contact the CareMax Chief Compliance Officer at teresa.mcmeans@caremax.com / 786-206-8721.

Thank you!