

Non-Discrimination and Non-Harassment

Non-Discrimination

It is the policy of the Company to maintain a work environment free from discrimination. More specifically, it is the policy of the Company to make all employment decisions on the basis of legitimate business considerations. This policy applies to all aspects of employment, including hiring, training, performance assessments, promotions, discipline and termination.

Non-Harassment

The Company will not tolerate any form of unlawful harassment in the workplace, including sexual harassment. Harassment is offensive, affects morale and, as a result, interferes with the work effectiveness of the person harassed.

This policy applies to all work-related settings and activities, whether inside or outside the workplace and includes customer sites, business trips and business-related social events. Company property (telephones, copy machines, computers and computer applications such as e-mail and Internet access) may not be used to engage in conduct which violates this policy.

The Company will not tolerate unlawful harassment or discrimination by employees or any other individuals who have a relationship with the company (including customers, outside contractors, vendors, etc.).

Sexual Harassment

Sexual harassment in particular has been defined by law as behavior directed towards an employee(s) on the basis of gender, and can include sexual advances, requests for sexual favors, or verbal and physical conduct of a sexual nature when:

- submission to such conduct is made either explicitly or implicitly a term or condition of employment; or
- submission to or rejection of such conduct is used as the basis for employment decisions affecting an individual; or
- such conduct has the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile, or offensive working environment.

While it is not possible to define precisely what type of conduct will constitute an intimidating, hostile or offensive working environment, it may include verbal abuse or insults of a sexual nature, sexual jokes or other references of a sexual nature, display or circulation of sexually degrading pictures or other materials, inquiry regarding another employee's sexual experiences or activities, and other similar offensive conduct. Sexual harassment can be directed to both male and female employees.

As a reminder, employees may report concerns of sexual harassment, or any additional concerns anonymously via www.lighthouse-services.com/americanwell.

Other Types of Harassment

It is also against the Company's policy to engage in verbal or physical conduct that denigrates or shows hostility or aversion towards an individual or others because of race, color, religion, national origin, gender, sexual orientation, marital status, age, qualified mental or physical disability, genetic information, gender identity, veteran status or other legally protected category that (1) has the purpose

or effect of creating an intimidating, hostile, humiliating, or offensive working environment; (2) has the purpose or effect of unreasonably interfering with an individual's work performance; or (3) otherwise adversely affects an individual's employment opportunities.

Depending on the circumstances, the following conduct may constitute discriminatory harassment based on any of these protected categories: epithets, slurs, negative stereotyping, jokes, or threatening, intimidating, or hostile acts, and/or written or graphic material that denigrates or shows hostility towards an individual or group that is circulated in the workplace or placed anywhere in the Company's premises, such as on an employee's desk or workspace, on the Company's e-mail or other electronic systems, or on the Company's equipment, bulletin boards or property.

No Retaliation

It also the policy of the Company to encourage employees to come forward with any complaints of unlawful discrimination, or of sexual or other unlawful harassment, and/or to cooperate in any investigation. This policy and the law prohibits retaliation against an employee for filing a complaint of unlawful discrimination or legally protected harassment, or for cooperating in the investigation of such a complaint, and any retaliation will not be tolerated.

Managerial Responsibility

- Promptly responding to all alleged incidents of discrimination or harassment by immediately reporting them to Human Resources;
- Ensuring compliance with this policy;
- Eliminating behavior that constitutes discrimination or harassment within the work environment under their responsibility;
- Protecting the privacy of the person involved as much as practicable and disclosing information related to the alleged conduct only to those with a need to know; and
- When appropriate as determined by Human Resources, participating in the investigation of the alleged conduct and taking corrective action, up to and including termination, as supported by Human Resources.

Employee Responsibility

- Behaving in a manner that does not constitute discrimination or harassment of other employees;
- If the offended employee wishes, discussing the behavior with the individual causing the problem to make him or her aware of the offensive nature of the behavior, to communicate that it is unwelcome, and to request that it stop; and
- Reporting the behavior to their immediate manager or one of the other individuals listed in this policy. The Company can only respond to those situations about which it knows. If the particular circumstances make a discussion or complaint to the manager inappropriate (e.g. if the complaint involves the manager or if retaliation from the manager is feared), the matter should be brought directly to one of the other individuals listed in this policy.

Process for Reporting, Investigating and resolving Allegations of Discrimination or Harassment

If you believe that you have been subjected to discrimination based on any protected status or sexual or other protected harassment, you have the right to file a complaint with the Company. To file a complaint, discuss a concern, or get additional information about the Company's discrimination or

harassment prevention policies and/or complaint process, you may contact any member of the Human Resources or Management teams, or more specifically one of the following people:

- Human.Resources@americanwell.com
- Brad Gay, General Counsel, Bradford.Gay@americanwell.com
- You may also report your concern anonymously via www.lighthouse-services.com/americanwell

Investigation

When the Company receives a complaint, the Company will promptly investigate the allegation in a fair and expeditious manner. Investigation will proceed as the particular circumstances warrant and will be conducted in such a way as to maintain confidentiality to the extent practicable under the circumstances. While every review is guided by the particular circumstances, an investigation typically will include an interview with the person filing the complaint, and interviews of persons identified as witnesses or who are reasonably expected to have knowledge of the incident or conduct.

The Company will also interview the person alleged to have committed the violation. All involved persons will be instructed to treat the investigation as confidential and not to discuss the allegations with other persons, particularly those not involved in the incident or conduct. Also, all involved persons will be informed that any form of retaliation directed toward an individual who makes a complaint or participates or cooperates in an investigation is unlawful and will not be tolerated by the Company. After completing the investigation, the Company will, to the extent appropriate, inform the person filing the complaint and the person alleged to have committed the conduct of the results of that investigation.

If it is determined that inappropriate conduct has occurred, the Company will act promptly to eliminate the offending conduct, and where it is appropriate, the Company will also impose corrective action, which could include termination of employment.

If as a result of the investigation it is determined that any individual engaged in conduct that either constitutes discrimination or harassment, or otherwise violates Company policies or rules of conduct, appropriate corrective or remedial action will be taken. Following this, the Company will monitor the situation to ensure that any improper conduct has stopped, and that there has been no discrimination or retaliatory action against the complaining employee.

State and Federal Remedies

The importance of this policy cannot be emphasized enough. An environment free of sexual and other harassment is not only the law, but also fundamental to the culture of the Company. The Company hopes that all employees will feel comfortable coming forward and allowing us to pursue an internal resolution of the matter that allows everyone to work together without unnecessary escalation of any inappropriate situation involving discrimination, or sexual or other harassment.

While the Company hopes that any employee who feels he or she has been the subject of unlawful harassment or discrimination will immediately bring the matter to the attention of his or her manager or one of the other individuals listed in this policy, employees also have the right to contact the government agencies that enforce the anti-discrimination laws. Using the Company complaint process does not prohibit anyone from filing a complaint with these agencies. The time frame for filing complaints with government agencies may vary by state.

Below is contact information for the federal and state agencies with whom you may file a complaint in Massachusetts:

The United States Equal Employment Opportunity Commission ("EEOC")

John F. Kennedy Federal Building
Government Center
4th Floor, Room 475
Boston, MA 02203
(617) 565-3200

The Massachusetts Commission Against Discrimination ("MCAD")

One Ashburton Place
Boston, MA 02108
(617) 994-6000

436 Dwight Street, Suite 220
Springfield, MA 01103
(413) 739-2145

Worcester City Hall
455 Main Street, Room 101
Worcester, MA 01608
(508) 799-8010

800 Purchase Street, Room 501
New Bedford, MA 02740
(508) 990-2390

Each of these agencies requires that complaints be filed within 300 days. If you work for Amwell in a state other than Massachusetts, you may consult your local state agency or consult with Human Resources for additional information.