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Owner James Garner:
Sr. Director, Audit
& Compliance
Area Compliance
Applicability Privia Health and
All Markets

Whistleblower Policy

1. Purpose:

The Audit Committee of the Board of Directors (the "Audit Committee") has adopted this Policy in order to reinforce the business integrity of the Company by providing a safe and reliable means for employees and others to report concerns they may have about conduct at Privia.

By following this Policy, you can raise concerns, confidentially and anonymously if desired, and free of any retaliation, discrimination, or harassment.

2. Scope:

This Whistleblower Policy (this "Policy") is binding upon you as an employee, officer, director, or independent contractor of Privia Health Group, Inc. and/or its subsidiaries (collectively, the "Company" or "Privia", "we", "us" or "our"). For convenience throughout this Policy, we refer to all of our employees, directors, officers, or independent contractors collectively as "you." You should consult with our Chief Compliance Officer if you have questions about this Policy.

The following procedures relate to Individual's complaints regarding any Fraudulent Auditing or Accounting Activities or any other violation, including, without limitation, the following:

- **fraud or deliberate error in the preparation, evaluation, review or audit of any financial statement of the Company;**
- **fraud or deliberate error in the recording and maintaining of financial books and/or records of the Company;**
- **deficiencies in or noncompliance with the Company's internal controls;**

- misrepresentation or false statement to or by a senior officer or accountant regarding a matter contained in the financial records, financial reports or audit reports of the Company;
- any attempts to mislead or improperly influence the Company's independent auditor in the course of the performance of their audit;
- deviation from full and fair reporting of the Company's financial condition, such as material misrepresentations or omissions with respect to the Company's business, financial condition, results of operations or cash flows, in public disclosures of the Company's financial position and prospective reports;
- improper expenditure of Company funds;
- improper use of Company property (including disclosure of proprietary information);
- use of non-public Company or client information to trade in securities;
- any violations of the Company's Code of Conduct; or
- any violations of the federal False Claims Act and the comparable state versions of that legislation.

3. Definitions:

- "Ethics Violations" in this Policy references suspected violations of our Code of Conduct.
- "Corporate Policy Violations" in this Policy references suspected violations of any other Company policies or procedures.
- "Fraudulent Auditing and Accounting Activities" in this Policy references questionable accounting, violations of internal accounting controls, or any other auditing or financial matters, or the reporting of fraudulent financial information.
- "Legal Violations" in this Policy references suspected violations of law or fraudulent activities other than Fraudulent Auditing and Accounting Activities.
- "Violations" in this Policy references Legal Violations, Ethics Violations and Corporate Policy Violations collectively.

4. Policy:

We ask that you bring to light good faith concerns regarding Privia's business practices. You should follow this Policy to report good faith concerns to Privia regarding any of the following:

- suspected violations of our Code of Conduct, which we refer to in this Policy as "Ethics Violations";
- suspected violations of any other Company policies or procedures, which we refer to in this

Policy as “Corporate Policy Violations”;

- questionable accounting, violations of internal accounting controls, or any other auditing or financial matters, or the reporting of fraudulent financial information, which we refer to in this Policy as “Fraudulent Auditing and Accounting Activities”;
- suspected violations of law or fraudulent activities other than Fraudulent Auditing and Accounting Activities, which we refer to in this Policy as “Legal Violations,” and collectively with Ethics Violations and Corporate Policy Violations as “Violations.”

If you are aware of a potential Violation and do not report it in accordance with this Policy, your inaction may be considered a Violation itself, which may result in disciplinary action, up to and including termination of your employment or any other relationship that you may have with Privia.

The Audit Committee may revise or amend this Policy as necessary or appropriate.

5. Procedure:

5.1. Complaint Procedures

You may submit a good faith complaint regarding any Violation without fear of dismissal or retaliation of any kind. The Company is committed to achieving compliance with all applicable laws and regulations, accounting standards, accounting controls and audit practices. You are encouraged to follow these procedures and report any possible violations or questionable matters that have occurred, are ongoing or are about to occur.

5.1.1. Receipt of Complaints

You may report any good faith concerns regarding potential Violations as follows:

- to your immediate supervisor if you are an employee of Privia or the compliance liaison located at one of our care centers;
- to any member of Privia’s executive management team;
- to the Compliance Department or Legal Department of Privia;
- directly to the Chief Compliance Officer of the Company; or
- via our ethics or reporting hotline by phone at (877) 851-8048 or online at www.priviahealth.com/ethicsline.

The concerns raised through these channels should include sufficient information and detail to enable the Company to conduct a thorough investigation.

5.1.2. Treatment of Complaints

Upon receipt of a complaint, the recipient shall refer the complaint to the Chief Compliance Officer of the Company. The Chief Compliance Officer will (i) determine if the complaint pertains to Fraudulent

Auditing or Accounting Activities, or whether it pertains to an Ethics Violation, Corporate Policy Violation or Legal Violation, and (ii) acknowledge receipt of the complaint to the sender within a reasonable period of time if the sender supplied contact information for a response.

If the complaint relates to Fraudulent Auditing and Accounting Activities, the Chief Compliance Officer will refer the complaint to the Audit Committee, and the complaint will be reviewed by the Audit Committee. The Audit Committee may delegate the review of the complaint to the General Counsel or such other persons (including management or outside advisors) as the Audit Committee determines to be appropriate. However, if the complaint only pertains to an Ethics Violation, a Corporate Policy Violation, or other Legal Violation, the Chief Compliance Officer will review the complaint, and he or she may delegate oversight of the complaint to such other persons, including other members of management or outside advisors, as he or she determines to be appropriate.

After initial review, the Audit Committee or the Chief Compliance Officer, as applicable, will determine whether the matter warrants an investigation and will oversee any such investigation. If an Ethics Violation, Corporate Policy Violation or Legal Violation appears to be significant, the Chief Compliance Officer will discuss such Violation with the General Counsel. The Audit Committee or the Chief Compliance Officer in consultation with the General Counsel, as applicable, may retain outside advisors to conduct all or any portion of the investigation. The person(s) authorized to conduct the investigation, whether by the Chief Compliance Officer or the Audit Committee, will submit a report to the Chief Compliance Officer or the Audit Committee, as applicable, of all findings of fact, conclusions and proposed recommendations for remedial actions, if any, in a timely manner following the conclusion of the investigation.

If a Violation has been reported, investigated, and confirmed, the Company will take prompt corrective action proportionate to the seriousness of the offense in the judgment of the Audit Committee or the Chief Compliance Officer in consultation with the General Counsel, as applicable. This action may include disciplinary action against the accused party, up to and including termination of employment or any other working relationship that the offending party may have with Privia. Reasonable and necessary steps will also be taken to prevent any further Violation.

We will not directly or indirectly, discharge, demote, suspend, threaten, harass or in any manner discriminate against you or the terms and conditions of your employment or other relationship with the Company based upon any lawful complaint made by you in good faith with respect to a potential Violation. Additionally, information disclosed in your complaint and during the subsequent investigation (if any) will, to the extent possible, remain confidential, except as may be reasonably necessary under the circumstances to facilitate the investigation, take remedial action, or comply with applicable law.

5.1.3. Reporting and Retention of Complaints and Investigations

The Chief Compliance Officer will maintain a log of all complaints, tracking their receipt, any investigation and resolution and shall prepare a periodic summary report on at least a semi-annual basis for the Audit Committee. Copies of complaints and such log will be maintained in accordance with the Company's document retention policy.

5.2. Reporting Complaints to Governmental Agency

You have the right to:

- Report possible violations of state or federal law or regulation that have occurred, are occurring, or are about to occur to any governmental agency or entity, or self-regulatory organization;
- Cooperate voluntarily with, or respond to any inquiry from, or provide testimony before any self-regulatory organization or any other federal, state or local regulatory or law enforcement authority;
- Make reports or disclosures to law enforcement or a regulatory authority without prior notice to, or authorization from, the Company; and
- Respond truthfully to a valid subpoena.

Further, you have the right to not be retaliated against for reporting, either internally to the Company or to any governmental agency or entity or self-regulatory organization, information which you reasonably believe relates to a possible Legal Violation or Fraudulent Auditing or Accounting Activities. It is a violation of federal law to retaliate against anyone who has reported such potential misconduct either internally or to any governmental agency or entity or self-regulatory organization. Retaliatory conduct includes discharge, demotion, suspension, threats, harassment, and any other manner of discrimination in the terms and conditions of employment because of any lawful act the employee may have performed. Any individual, regardless of position or title, who has been determined to have engaged in retaliation against such employee in contravention of this Policy, will be subject to appropriate disciplinary action, up to and including termination of employment or any other working relationship with the Company.

Notwithstanding anything contained in this Policy or otherwise, you may disclose confidential Company information, including the existence and terms of any confidential agreements between you and the Company (including employment or severance agreements), to any governmental agency or entity or self-regulatory organization in connection with reporting in good faith a suspected Violation.

The Company cannot require you to withdraw reports or filings alleging possible Legal Violations, and may not offer you any kind of inducement, including payment, to do so.

Your rights and remedies as a whistleblower protected under applicable whistleblower laws, including a monetary award, if any, may not be waived by any agreement, policy form, or condition of employment, including by a pre-dispute arbitration agreement.

Even if you have participated in a possible Violation, you may be eligible to participate in the confidentiality and retaliation protections afforded under applicable whistleblower laws, and may also be eligible to receive an award under such laws.

5.3. Reporting Concerns Related to the Federal False Claims Act

Under the civil False Claims Act, any person who submits a false or fraudulent claim for payment to the United States Government is subject to a fine of from \$11,665 to \$23,331 (as of June 2020, and subject to annual adjustments for inflation) or each claim plus three times the amount claimed. In addition, under certain circumstances, private individuals can bring “qui tam” (whistleblower) suits in the name of the United States against health care providers, and the individual shares in any recovery against the provider.

The federal and state versions of the False Claims Act include “qui tam” provisions, commonly referred to as the “whistleblower” provision. These whistleblower protections may allow a person with knowledge of a false claim to bring a civil action on behalf of the government. They also protect a whistleblower from retaliation by their employer. An employee cannot be discharged, demoted, suspended, threatened, harassed, or discriminated against in his employment because of the employee’s lawful acts in furtherance of a false claims action. State laws and this Policy provide similar whistleblower protections, which are discussed above, for individuals who report compliance concerns in good faith.

We encourage you to be aware of the laws regarding fraud and abuse and false claims and to identify and resolve any issues immediately. Issues are resolved fastest and most effectively when given prompt attention. You should report concerns pertaining to the federal False Claims Act and any comparable state versions of that legislation in accordance with the procedures set forth in Section 3 (Complaint Procedures) of this Policy. You can also report concerns directly to the US Department of Health & Human Services Office of Inspector General.

Approval Signatures

Step Description	Approver	Date
Chief Audit & Compliance Officer Approval	Dana Fields: SVP, Internal Audit & Chief Compliance Officer	06/2022
Compliance & Audit Leadership #1	James Garner: Senior Director, Audit & Compliance	06/2022
	James Garner: Senior Director, Audit & Compliance	06/2022
	Dana Fields: SVP, Internal Audit & Chief Compliance Officer	04/2021