

Onward Code of Conduct for Community Members

Rev. February 2026

This Code of Conduct (“Code”) outlines Onward Health Inc. (“Onward”) requirements of behavior and conduct for all members of the Onward ecosystem. This includes anyone who drives for or on behalf of Onward (“Driver”), passengers, riders, and those who utilize or obtain services from Onward (“Rider”). A Community Member is defined as a Driver, Rider, or any other utilizer of the Onward platform or any Onward’s services.

Additionally, “Associated Rider Parties” is a defined term in this Code. Associated Rider Parties include a Rider’s family members, caregivers, associates, friends, and any other individuals whom the Driver met as a result of or through the ride involving the Rider. All requirements that apply with respect to Driver conduct towards or concerning a Rider also apply to Driver conduct to or concerning an Associated Rider Party. Likewise, Onward may take action against a Rider for Conduct of the Rider’s Associated Rider Party, which would violate this Code if the Associated Rider Party were themselves a Rider.

Failure to abide by the provisions set forth in this Code of Conduct may result in Onward in its sole discretion terminating or suspending access to Onward’s services.

Reporting Violations of this Code of Conduct

Onward wants to hear about any violation of this Code of Conduct. All reported violations will be appropriately investigated. To report an actual or suspected violation you can email support@onwardrides.com or call (800) 700-4797.

Onward will not retaliate for reporting an actual or suspected violation nor will it tolerate retaliation on the part of any community member. All reports are and will be treated with the utmost confidence to the extent possible.

General Behavioral Expectations

All Drivers and Riders will treat each other and all Onward team members with general courtesy, respect, and professionalism at all times. Drivers and Riders will abide by all applicable local, state, and federal laws. Drivers must also follow all rules regarding how to properly conduct a companion ride including but not limited to walking Riders in and out of the vehicle; all of these stipulations are provided at driver training, and breach of them may result in loss of access to the platform.

ZERO TOLERANCE POLICY - Alcohol and Substance Usage Reporting & Enforcement (Zero Tolerance)

Riders and other community members may report suspected violations of this Zero Tolerance Policy by emailing support@onwardrides.com or calling (800) 700-4797. Upon receiving a complaint alleging a driver was under the influence of drugs and/or alcohol while providing services, Onward will promptly suspend the driver’s access to the platform while Onward investigates the complaint. If a violation is substantiated, Onward may permanently deactivate the driver and may notify law enforcement as appropriate.

Onward has a zero-tolerance policy for Drivers using or being under the effects of any alcohol or substances while engaged in a ride with Onward. Drivers are prohibited from being under the

influence or effects of alcohol or any other substance - illicit or otherwise - to any degree while driving with Onward. This applies regardless of whether or not a Driver is within the state's legal limit for alcohol consumption or is otherwise taking a prescription or non-prescription medication which may affect the Driver's ability to safely operate a vehicle. Riders and Drivers alike are strictly prohibited from using any alcohol or drugs during a ride. This does not prohibit a Rider from taking lawful prescription or over-the-counter medication as needed.

DOT/FTA-covered services: Where a Driver is performing DOT/FTA-covered safety-sensitive functions, Onward's testing program (including definitions of a "refusal to test," testing procedures, and consequences of test results) will be administered in accordance with 49 CFR Part 655 and 49 CFR Part 40, as applicable

Zero-Tolerance Complaints (Driver Alcohol/Drug Allegations)

If Onward receives a complaint alleging a Driver violated the zero-tolerance alcohol/drug rule, Onward will promptly suspend the Driver's access pending investigation, consistent with applicable TNC requirements.

In California, Riders may also contact the CPUC Consumer Intake Unit at 1-800-894-9444 or CIU_intake@cpuc.ca.gov for passenger carrier complaint

General Vehicle and Driving Expectations

Drivers will only drive the vehicle that is registered with Onward. Vehicles shall be maintained in a clean manner. Vehicles shall be washed, vacuumed, trash-free, and free of any unpleasant or strong odors. Drivers shall themselves be free of any strong or unpleasant odors, and fully dressed (shirt, pants, and shoes) in a conservative manner with clothing that is free of any potentially offensive language or logos. A Driver shall not represent themselves as medical transportation or as a medical professional. A Driver who is in fact a licensed medical professional is not authorized to act in such capacity while driving with Onward, unless an unforeseen medical emergency situation arises.

Onward reserves the right to, in its sole and absolute discretion, approve or disapprove the use of any vehicle for use on the platform.

Smoking, Vaping, and Tobacco Usage

Smoking, Vaping, and Tobacco Usage is never allowed during any Onward ride. Additionally, Drivers are prohibited from smoking or vaping or allowing anyone under their control to smoke or vape, in any vehicle that is used for Onward regardless of if the vehicle is actively engaged in a ride.

Physical Violence

Physical violence is strictly prohibited. This includes but is not limited to hitting, striking, pushing, shoving, or otherwise engaging in any unwanted physical conduct. Onward reserves the right to notify law enforcement of any act of physical violence.

Sexual Harassment and Sexual Assault

Onward does not tolerate sexual assault, sexual harassment, and/or other sexual misconduct from anyone. We take all allegations of such behavior involving our Drivers or Riders extremely seriously. Through enforcement of this policy, and by education of Drivers and Riders, Onward will seek to prevent and respond appropriately to reported behavior that violates this policy. This may include permanently deactivating (banning) a Driver or Rider from using the Onward Platform.

Sexual Assault, as defined by the National Sexual Violence Resource Center (NSVRC), sexual assault is physical or attempted physical conduct that is sexual in nature and without the consent of the user. "Sexual in nature" includes, but is not limited to, body parts such as the mouth, breasts, buttocks, or genitalia.

Sexual harassment is non-physical conduct of a sexual nature that is unwelcome and without consent. It includes making unwelcome sexual advances or requests for sexual favors, or engaging in other verbal or physical conduct of a sexual nature, when: (1) submission to such conduct is made explicitly as a term or condition of a ride or payment for a ride; or (2) submission to or rejection of such advances or requests is used as a basis for providing or denying rides or payment; or (3) such conduct has the purpose or effect of interfering with work performance or creating an intimidating, hostile, or offensive environment. All sexual contact is prohibited while using the Onward Platform, including during a trip, regardless of whether consent is given and irrespective of whether the Driver and Rider know each other.

Examples of sexual harassment include but are not limited to:

- Staring or leering
- Asking personal questions (e.g., about relationship status, sexual orientation, phone number, social media accounts)
- Flirting
- Violating physical space norms (e.g., standing too close, impeding or blocking movement)
- Making comments about appearance (e.g., derogatory comments, "complimentary" comments, comments about someone's perceived gender identity or expression)
- Sexually explicit gestures
- Sexually explicit comments (e.g., about sex acts, degrading words, obscene comments, derogatory comments, slurs or jokes)
- Displaying indecent material (e.g., photos, videos, pornography, sexually suggestive cartoons or posters)
- Indecent photography/video without consent
- Soliciting a sexual act (e.g., unwanted sexual invitations, offering money for sex)
- Indecent exposure (e.g., performing sex acts during a trip, "flashing", urinating in public)
- Verbal threat of sexual assault
- Masturbation or other inappropriate self-touching

Post-Ride Contact

Onward prohibits any contact between Drivers, Riders, and Associated Rider Parties following the completion of a ride.

All communication between the Driver, Rider, and/or Associated Rider Parties must cease immediately after the trip ends. The only pre-approved exception is for the purpose of returning a lost or misplaced item, provided the Rider has explicitly consented to having the Driver return the item.

In unusual circumstances, a Rider or Driver may request an exception to this policy by contacting the Concierge Team. This restriction does not prohibit communications that occur through Onward (or as required by law) for safety investigations, insurance claims, responding to legal process, or coordinating with law enforcement.

Verbal Behavior and Inappropriate Behavior

Verbal behavior, including yelling, screaming, threatening (including to leave a Rider stranded), excessive profanity, insulting, belittling or otherwise engaging in verbal conduct that does not reflect a high level of common decency is prohibited. Gestures that are intended or have the effect of insulting or demeaning someone are prohibited. Any clothing article that displays wording or other images likely to cause upset or insult is prohibited.

Discrimination

Onward expressly prohibits any discrimination on the basis of actual or perceived race, religion, color, national origin, ancestry, physical or mental disability, medical condition, marital status, military or veteran status, age, sex (including childbirth, breastfeeding, pregnancy, and related medical conditions), gender, gender identity, gender expression, sexual orientation, HIV-status, natural hair, genetic information or testing, domestic violence/sexual assault/stalking victim status, and all other bases protected by federal, state, or local law, ordinance, or regulation. Discrimination may include but is not limited to refusal to provide or accept services based on any protected characteristic.

Weapons

Onward prohibits the carrying or usage of any weapon during a ride. Onward expressly disclaims and will not be held liable for any usage of a weapon during a ride, even if such weapon is lawfully carried under state law.

Onward's Intellectual Property

Drivers and Riders are prohibited from utilizing Onward's intellectual property, including its name, logo, likeness, or any other tangible or intangible asset that is attributed to Onward except to the extent that an applicable licensing agreement may grant or as provided for in this section. Onward has authorized Driver's only to utilize Onward's name and logo on Onward's approved trade dress to be displayed by the Driver in accordance with applicable state law only while conducting a ride with Onward. Additionally, A Driver is authorized to use the name and logo of Onward on any issues piece of clothing, identification, or equipment issued by Onward for use solely during a ride. Rider's are not permitted to use Onward's intellectual property unless specifically provide for by a licensing agreement.

Fraudulent Behaviors

Drivers and Riders will refrain from engaging in any activity which may constitute or be perceived as fraudulent. This includes but is not limited to: requesting a toll refund when no toll was paid, starting a ride earlier than stated through the app, ending a Rider earlier than stated in the app, marking a ride as completed when it was not, or not providing the services to the same service delivery standards as required by Onward.

Criminal Activity

The usage of Onward to engage in any illegal or illicit activity including but not limited to drug sales, human trafficking, kidnapping, fraud, escape, evasion, or any other illegal activity is strictly prohibited.

Vehicle Operations

Drivers will operate their vehicles at all times with the utmost care and due regard for the safety of their passenger(s) and members of the public. Drivers will obey all traffic laws and regulations and seek to drive in a defensive manner that avoids collisions, near collisions, and unsafe driving behavior. Seat belts shall be worn at all times by Drivers and Riders in the vehicle. A Driver's vehicle shall be free of any potentially offensive language or logos.

Service Animals

All Drivers must get prior approval including providing a physician's note during the onboarding process to bring a service animal along with them while performing trips for Onward. During the onboarding process, Drivers must provide a physician's note that is no more than one year old. Onward maintains sole and absolute discretion on allowing service animals. Onward will not require unnecessary documentation and will request information only to the extent reasonably needed to evaluate the request and ensure the Driver can safely perform required ride services.

Once approved, if the service animal could affect the Driver's ability to provide Onward's door-through-door service for any ride, particularly if physical support for the Rider is needed, the Driver must not accept the ride. The Driver also must reach out to the Rider upon claiming any ride to let them know they will have a service animal in tow with them to ensure the Rider is comfortable with this; if the Rider rejects the ride due to the service animal, the Driver must let Concierge know ASAP. The Driver will not be charged a transfer fee, but will not be compensated for a ride that is rejected by a Rider.

Drivers may not refuse a ride on the basis that a Rider has a service animal. Federal and some states laws generally prohibit denying service to a Rider because of service animals, and from otherwise discriminating against Riders with service animals. Onward Health prohibits Drivers from denying service to a Rider because of the Rider's service animal. There are no exceptions to this policy due to allergies, religious objections, or a generalized fear of animals.

Assistive Devices

Onward prohibits Drivers from refusing service to a Rider with a disability who can use the vehicle with reasonable assistance, and from refusing to provide reasonable assistance with stowing mobility aids (e.g., folding wheelchairs, walkers, canes, crutches) where Drivers ordinarily assist with comparable items (such as luggage). Drivers may not impose different or higher fees based on disability-related equipment.

Reporting Emergencies and In-Ride Incidents

Emergencies and any in-ride incidents (including but not limited to any traffic accidents, medical emergencies, vehicle fires, crime, or concerns about Rider or Driver conduct) shall be reported as soon as possible but in no case outside of sixty minutes of the emergency or incident. Emergencies and Incidents shall be reported to the concierge team at (800) 700-4797 through the app, or by email to support@onwardrides.com.

Gratuities

Drivers are prohibited from accepting, and Riders are prohibited from offering, any form of compensation, including cash, cash transfers (Venmo, Zelle, etc), gifts, or other forms of gratuities other than what is permissible through the Onward app.

Cameras

To the extent permitted by law, Drivers and passengers are permitted to utilize cameras to the to record the ride. Some states require that the recording party notify the other party that they intend to record. Sharing or streaming of a Driver or passenger name or information is a violation of our privacy standards and is prohibited without the other party's consent. Drivers are not permitted to record the interior of the vehicle when driving with a Rider who is coming from a healthcare facility when such a healthcare facility arranged the ride. Recording must comply with applicable law. Drivers and Riders may not record audio unless they have provided legally required notice and obtained any required consent. Onward may require use of an in-app

recording disclosure or other notice mechanism where available. The Driver camera use policy may be further governed in the DICA.

Use of Accounts

Drivers and Riders shall only utilize the account for which they are registered and which correctly displays their name and all pertinent information (photographs, vehicle, license plate). Drivers who are picking up a Rider where the ride was arranged by a third party shall verify that they have picked up the correct Rider.

Privacy of Information

Drivers shall keep confidential and not disclose any identifying information pertaining to the identity of the Rider unless expressly authorized by law. Riders shall not utilize or disclose any information obtained about the Driver outside of the Driver's name unless expressly authorized by the Driver.

Property Damage

Damaging the property of another is never permitted. This may include breaking a part of the vehicle, an electronic device, or emitting any bodily fluids on part of or inside of the vehicle. The party (Driver or Rider) damaging the property of the other shall be responsible for the cost of replacing, repairing, or cleaning the property.