

At the heart of healthcare

WELL Health is a company that not only provides care but also cares deeply about the ecosystem it supports. That care extends to all that we do, including our environment, social and governance (ESG) initiatives. We are right in the action, helping practitioners do what they do best – care for their patients. From dealing directly with healthcare providers and offering innovative technologies so they can deliver exceptional care, to helping patients secure their own healthcare data and cultivating a healthy workplace, we are focused on making a meaningful and positive difference in the markets we serve.

What's inside



Who we are



A word from our CEO



Our ESG program



ESG foundation: Disciplined governance and risk framework



ESG priority 1: **Practitioner** support and digital enablement



ESG priority 2: Safeguarding patient data



ESG priority 3: A healthy place to work

WELL was founded on the traditional and unceded territories of the Musqueam, Squamish, and Tsleil-Waututh Nations and since then, our work today spans many other territories and treaty areas. We are grateful for the opportunity to serve practitioners and patients across these territories, and we will continue to seek out ways to uphold the principles of reconciliation through our work.

Solutions that power the heart of healthcare

Healthcare providers are at the heart of healthcare delivery, focused on providing care to their patients at every turn. WELL's practitioner enablement platform provides digital healthcare solutions to clinics and empowers healthcare providers worldwide, including practitioners who we support within our own outpatient medical clinic network, as well as healthcare providers in non-WELL owned and operated healthcare clinics globally who are served by our platform. By using our powerful digital tools and services, including our operating platform, which provides a fully managed solution and runs facilities for the healthcare industry, healthcare providers can focus more freely on caring for their patients.

WELL's business operations are organized into two key lines of business:



VIRTUAL SERVICES

(with little to no bricks and mortar)

Virtual focused care

WELL EMR (electronic medical records) group

Digital health apps

Billing and revenue cycle management (RCM)

Cybersecurity



OMNI-CHANNEL PATIENT SERVICES (hybrid service delivery - bricks + clicks)

Primary care

Diagnostic care

Specialized care

Allied health care



ESG PRIORITY 1: PRACTITIONER SUPPORT AND DIGITAL ENABLEMENT

ESG PRIORITY 2: SAFEGUARDING PATIENT DATA

ESG PRIORITY 3: A HEALTHY PLACE TO WORK

WHO WE ARE

The heart of everything we do

WELL is a purpose-driven company: Our mission, vision and purpose remain at the centre of all that we do and guide us in our actions every day.

Mission

Our mission is to positively impact health outcomes by leveraging technology to empower and support healthcare practitioners and their patients globally.

Vision

Globally, healthcare is under-imagined and under-digitized. At WELL, we envision a healthcare system where patients around the world have greater access to services, and where physicians are empowered with technology designed to enhance their delivery of healthcare while allowing them to focus more on doing what they do best – caring for their patients. We are bringing this vision to life within our own bricks and mortar and virtual healthcare clinics, as well as in the thousands of healthcare environments we support across North America and other parts of the world.

Purpose

Healthcare providers, and the teams that support them, are the driving force behind healthcare delivery, patient healthcare experiences and, ultimately, health outcomes. At WELL, our purpose is to modernize and improve healthcare delivery by empowering healthcare providers with cutting-edge digital technology, products and services that are designed to streamline care delivery, enhance/transform healthcare experiences, automate and digitize administrative tasks, and alleviate many of the inefficiencies and challenges faced by healthcare providers and the patients for whom they care.

WELL by the numbers

WELL is Canada's largest outpatient medical clinic owner-operator and leading multi-disciplinary digital health service provider. As a market leader in the digital health sector, we have more than 2,000 practitioners working within the WELL family across over 80 clinics in Canada and the U.S., and an additional 21,000+ practitioners across more than 3,000 clinics served by WELL's lineup of virtual services in North America. Between our own clinics and the clinic footprint that consumes our practitioner enablement platform services, we are helping healthcare providers support tens of millions of registered patients in four different countries, including Canada, United Sates, New Zealand and Australia.

We are a fast-growing company, generating revenues of \$302 million in 2021, an increase of 500 per cent over 2020, and employing more than 2,900 people across our organization. We ended 2021, with a run-rate of better than \$400M in revenues and adjusted EBITDA of close to \$100M. All together, we estimate there were more than 2.6 million omni-channel patient visits delivered in 2021, and more than 15 million patient profiles supported by WELL's EMR Group.

WELL clinicians

2.6+ million

Total omni-channel patient visits

Practitioners supported by billing and back-office services

in WELL's EMRs¹

21,000+

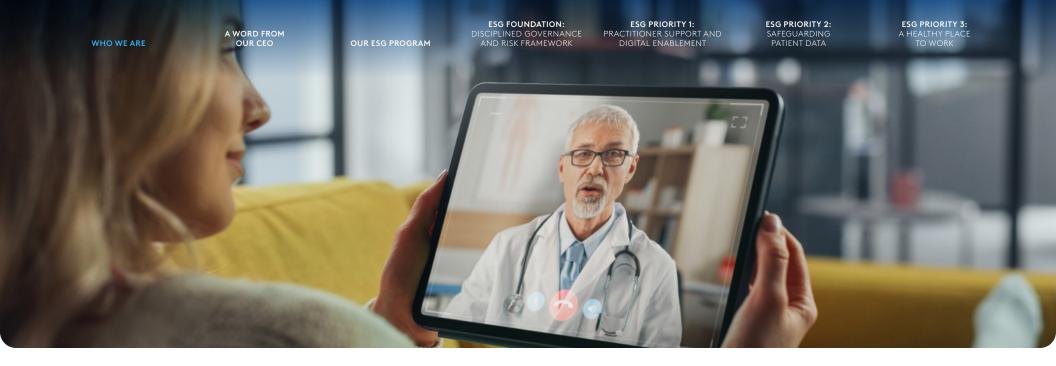
Practitioners supported by WELL's platform

Clinics supported by WELL's platform

Digital apps

WELL team members

¹ This number has not been de-duplicated across different EMR platforms due to patient privacy concerns.



The WELL difference

At WELL Health, we focus on helping healthcare practitioners deliver positive health outcomes, so they can focus on caring for their patients.

Improving the practitioner journey

We empower physicians with digital tools and services which includes a fully managed operating platform that runs healthcare facilities that free them up to provide enhanced care for their patients. By using WELL's practitioner enablement platform, physicians working in WELL's extensive virtual and/or physical care network or in their own independent clinics have access to a wealth of innovative technologies that are designed to increase clinic efficiency, enhance physician and patient experiences, and

improve health outcomes. As the chart on page 7 shows, with the support of our connected platform, healthcare providers are free to spend much more time on care delivery and less time on administrative tasks and inefficient processes, benefiting both healthcare providers and their patients.

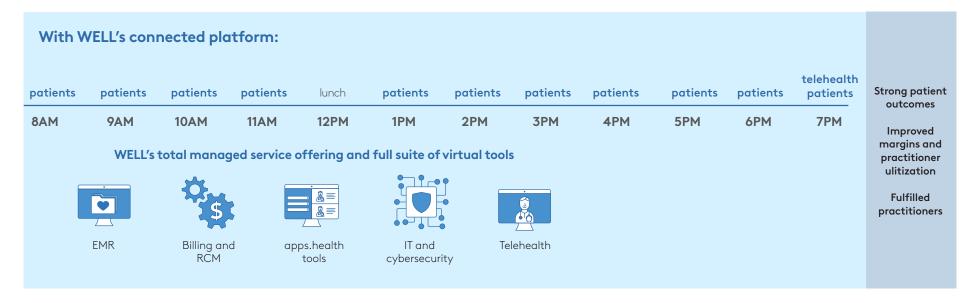
Improving the patient journey

Our open and connected practitioner enablement platform improves interoperability between existing clinic systems like EMRs and a host of curated and compelling á la carte applications and services. As the chart on page 8 shows, apps and services are designed to streamline care delivery, secure patient healthcare information, unburden physicians from mundane administrative tasks, enhance both physicians and their patients' healthcare experiences and, perhaps most importantly, improve healthcare outcomes.

How WELL improves the practitioner journey

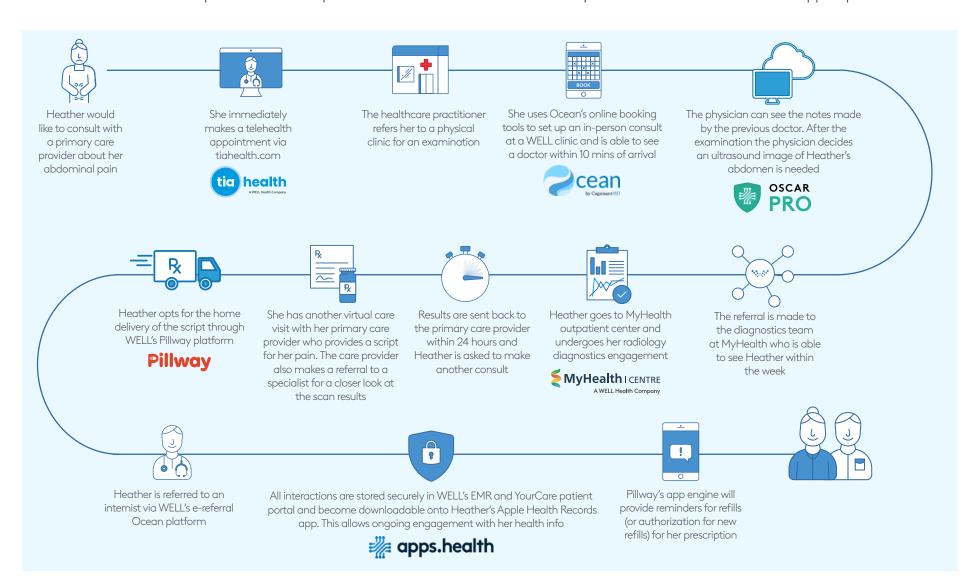
WELL's practitioner enablement platform and fully managed solutions save healthcare practitioners valuable time and allows them to spend more time and focus on patients.





How WELL improves the patient journey

Below is an illustrative example of how WELL's platform solutions can allow healthcare practitioners to collaborate and support patients.





A WORD FROM OUR CEO

Healthcare, with heart

At our core, the WELL Health family is dedicated to helping healthcare practitioners deliver better health outcomes. Our goal is to care for the caretakers, so they can provide the best care to their patients.

At WELL Health, it is our mission to design the best-in class healthcare tools and services that empower healthcare providers to improve patient outcomes. Our vision is to make the healthcare experience better for everyone involved – healthcare providers and their teams, as well as those who receive care. We have built our purpose on the foundation of modernizing healthcare systems with accessible and efficient cutting-edge digital technology that exceeds today's healthcare challenges and prepares for our future needs.

Hamed Shahbazi

Chairman and Chief Executive Officer



While we are known for our digital technology solutions which are acquired and used by close to one out of every 4 doctors in Canada, the biggest application of our delivery platform is in our own patient services businesses where our more than 2000 healthcare practitioners provide thousands of patient visits every single day between the United States and Canada.

Our business, technologies and services have the power to influence the environmental, health and economic outcomes and provide societal value for millions of people around the world. We are delivering on our mission, vision and purpose with integrity and care that is having meaningful long-term impacts. A key component of that delivery is our focus on environmental, social and governance (ESG) initiatives that are making a significant difference. I am proud to be sharing our inaugural ESG report that showcases our commitments, efforts and responsibilities to drive real positive change.

Realizing a year of growth, strength and purpose

2021 was a transformational year for WELL, as we delivered close to one million patient visits and asynchronous consultations, completed substantial acquisitions, including <u>CRH Medical</u> and MyHealth, and embarked upon our ESG journey.

Key highlights from 2021 include:

- Establishing an ESG Steering Committee and leveraging the skills and passions of our leaders to spearhead the development of a wholistic and agile ESG program and framework
- Generating total revenue of \$302.3 million, or 502 per cent higher than the prior year, driven by inorganic and organic growth and ending the year with a run-rate of over \$400M in revenues and approaching \$100M in Adjusted EBITDA.
- Appointing a Chief People Officer and taking targeted actions to support diversity, equity and inclusion within our workplace and lead our ESG efforts
- Supporting more than 21,000 practitioners through our healthcare technology platform.

services have the power to influence the environmental. health and economic outcomes and provide societal value for millions of people around the world.

• Hosting and caring for over 2,000 healthcare practitioners in both the US and Canada as part of our fully managed solution which allows healthcare practitioners to focus on care delivery and WELL to run their operations.

With healthcare at the forefront of the COVID-19 pandemic, we have been relentless in supporting our practitioners, their patients and our people. Some examples include the measures taken at WELL clinics to limit the risks from COVID-19 on patients, such as:

- Offering virtual care options to limit the numbers of patients required to visit clinics and reduce wait times
- Creating and implementing the Safe Entry Assistant for COVID-19, an easy-to-use tool for patients to self-screen for COVID-19 symptoms before they enter the clinic
- Introducing digital self-check-in so patients can check in before entering the clinic at both WELL Health and MyHealth

Our commitment to ESG

Looking at our ESG strategy, our team is committed to delivering on our strategic ESG focus areas, which are centered around:

- Implementing industry-leading cybersecurity practices that go beyond compliance, ensuring we safeguard patient data and provide timely access to high quality health information to practitioners and patients to enable positive outcomes.
- Reducing the trends of inequity and inaccessibility that patients face by empowering them to choose how, when and where they receive quality care
- Digitizing healthcare processes to improve efficiencies and simultaneously avoid the emissions of greenhouse gases (GHG) from travel and material waste generated by both practitioners and patients
- Supporting our valued team members and empowering their well-being, satisfaction and development, by implementing practices that make our workplaces safe, healthy, diverse, equitable and innovative. Notably, I am proud to be part of an organization where 70 per cent of our senior executive team represent a visible minority.

Making a difference through giving

Our team members remain the driving force behind our company and integral to our purpose-driven commitment. As an example, with the recent humanitarian crisis in the Ukraine, our team came together in March 2022 to help make a difference. Combined, WELL Health and our team members donated more than \$100,000 to UNICEF to support on the around efforts in Ukraine. in particular to assist children who have been harmed or may be in immediate danger. Recognizing the impact this war can also have on our team members, we provided free access to mental health services in March, to provide them with the space, support and resources they may need.

Looking ahead

As we navigate an uncertain geopolitical and socioeconomic environment, WELL's outlook remains positive across all aspects of our business, including delivering on our strategic ESG objectives. For 2022, our goals include augmenting our ESG performance indicators, building a best-in-class employee experience, and continuing to deliver on our purpose to positively impact health outcomes by leveraging technology to empower healthcare practitioners and their patients.

In the pages that follow, you will find more information about our relentless efforts to align our strategy, business units and resources in ways that enable us to continue delivering tremendous societal value to our stakeholders. Through the shared commitment of our team members, practitioners and clinicians, we will continue to work toward ESG excellence on our journey to deliver better healthcare experiences through technology.

Best regards, LAMBED

Hamed Shahbazi

Founder and Chief Executive Officer

As we navigate an uncertain geopolitical and socioeconomic environment, WELL's outlook remains positive across all aspects of our business, including delivering on our strategic ESG objectives.



OUR ESG PROGRAM

Creating sustainable value through ESG

As an essential part of our strong leadership role in the business community, at WELL, we are firmly committed to upholding high environmental, social and governance (ESG) standards across all aspects of our company. This commitment is fundamental to our overall mission, vision and strategy, which reflect our ultimate end goal of impacting positive health outcomes.

We believe in a quadruple bottom-line approach, where we measure our performance not only in financial terms but also in terms of the value we create for people, the environment and the community. In addition to value creation, we recognize the importance of strong risk management within the digital health sector, particularly given the sensitivity of the interface between technology and healthcare.

Our ESG process

In 2021, WELL embarked on a company-wide effort to accelerate our sustainability efforts through the lens of ESG. We established an ESG Committee, and with the support of ESG experts, identified key priorities and underwent an assessment of our ESG risks and opportunities.

ESG PRIORITY 2

The process to identify and prioritize ESG topics for this report included the following steps:

- 1. Set objectives for the establishment of an ESG program and formed a cross-functional ESG Committee made up of senior executives and functional business leaders, who consulted with subject matter experts from across the WELL Health family of companies
- 2. Performed a market review of ESG reporting practices and expectations, including other companies in the digital health sector, investors, ESG standards and ESG ratings agencies, to identify high-value and relevant ESG topics
- 3. Conducted interviews with a range of internal stakeholders, from all parts of our businesses, to assess our current ESG performance and identify ESG priorities
- 4. Validated a shortlist of prioritized ESG topics based on the market review and interviews during comprehensive workshops held with our **ESG** Committee
- 5. Developed and refinined our ESG framework based on the priorities agreed to by our ESG Committee
- 6. Finalized our desired future ESG objectives and performance through an extensive ESG ambition-setting workshop held with our ESG Committee
- 7. Established our ESG framework and ESG priorities.

Since establishing our ESG framework, we have worked to put in place supporting governance and reporting mechanisms, and have begun to articulate our ESG vision and ambition to our stakeholders through our investor communications and public media releases, in preparation for the publication of this report.

OUR ESG PROGRAM

Making a heartfelt difference through ESG excellence

Our big idea is that we care for healthcare practitioners that care for patients. Healthcare practitioners are burdened unlike any other time dealing with issues such as: data protection requirements, supply chain challenges, people challenges and expectations of digital patient engagement. As we focus on helping practitioners deliver improved health outcomes, we remain deeply committed to environmental, social and governance (ESG) excellence so we can continue making a positive difference for healthcare providers and their patients, as well as our team members who are critical to our success. With this commitment in mind, we have established an ESG framework that includes key areas we believe are most relevant to our strategy and to our ability to have a meaningful impact.

Our ESG framework and priorities



PRIORITY 1:

Practitioner support and digital enablement

To improve health outcomes for patients by supporting the practitioner to provide timely, accessible and high quality patient-centred continuous care



PRIORITY 2: Safeguarding patient data

To safeguard the privacy and security of our patients' data while empowering them to leverage their health information



PRIORITY 3: A healthy place to work

To uphold a culture built on respect that reflects our diverse people and communities we serve. prioritizes health and wellbeing, and empowers our people to be the best they can be



Disciplined governance and risk framework

and compliance, across our business activites

OUR ESG PROGRAM

About this report

WELL Health is a purpose-driven business with a mission to positively impact health outcomes by empowering practitioners and patients. As a part of our growth strategy, we have developed an ESG framework that reflects our ongoing commitment to deliver on this mission and aligns to our vision and values.

By adopting an ESG framework and publishing our first ESG report, we aim to:

- Drive positive change for patients, practitioners and our own people
- Minimize negative environmental impacts associated with our business
- Be transparent about our ESG performance
- Progressively improve our ESG performance over time.

Reporting period and organizational boundary

This report is designed for our key stakeholders including investors, partners, regulators and suppliers. It covers all WELL Health business units and subsidiaries for the period January to December 2021, and unless otherwise stated, performance data, policies and procedures should be assumed to apply to the whole organization across this time period.

This report reflects the current status of our ESG reporting and is based on readily available data. We aim to evolve reporting across all of our business units in future reports.

All financial information is reported in Canadian dollars unless otherwise specified.

ESG reporting standards

Several global ESG standards, including the Global Reporting Initiative (GRI) Standards and the Sustainability Accounting Standards Board (SASB) Health Care Delivery and Software & IT Services Industry Standards, have been considered and referred to during development of this report. We intend to work towards alignment to one or more of these standards in our future reporting years.

Currently our ESG priorities align to and support the following United Nations Sustainable Development Goals (SDG):

- SDG 3: Good health and well-being Ensure healthy lives and promote well-being for all at all ages
- SDG 8: Decent work and economic growth Promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all
- SDG 10: Reduced inequalities Reduce inequality within and among countries
- **SDG 11: Sustainable cities and communities -** Make cities and human settlements inclusive, safe, resilient and sustainable
- SDG 12: Responsible consumption and production Ensure sustainable consumption and production patterns
- **SDG 13: Climate action** Take urgent action to combat climate change and its impacts.

Forward-looking statements

As used in this ESG report and unless otherwise indicated, the terms we, us, our, Company, and WELL refer to WELL Health Technologies Corp. and its direct and indirect subsidiaries set out later in this report. Certain statements in this ESG report constitute forward-looking statements within the meaning of applicable securities laws. This report contains forward-looking statements addressing expectations, prospects, estimates and other matters that are dependent on future events or developments. These statements may be identified by words such as expect, anticipate, intend, plan, believe, will, should, could, would, project, continue, likely, commit to or other words or expressions of similar meaning, although not all forwardlooking statements contain such terms. Actual results may differ materially from those projected, anticipated or implied in forward-looking statements due to a variety of factors. Forward-looking statements speak only as of the date this document is first published. Except to the extent required by applicable law, WELL Health undertakes no obligation to update or revise any forward-looking statement. Forward-looking statements or promises that goals or targets will be met. Investors are cautioned not to place undue reliance on any forwardlooking statements.

A WORD FROM WHO WE ARE OUR CEO

OUR ESG PROGRAM

ESG FOUNDATION:
DISCIPLINED GOVERNANCE
AND RISK FRAMEWORK

ESG PRIORITY 1: RACTITIONER SUPPORT AND DIGITAL ENABLEMENT ESG PRIORITY 2: SAFEGUARDING PATIENT DATA ESG PRIORITY 3: A HEALTHY PLACE



ESG FOUNDATION

Disciplined governance and risk framework

ESG FOUNDATION: DISCIPLINED GOVERNANCE AND RISK FRAMEWORK

Our commitment to good governance and integrity

Our focus on environmental, social and governance (ESG) begins with a strong foundation of governance and risk management. Recognizing the importance of doing the right thing, our dedication to good governance and integrity in our actions underpins all that we do.

As an integral part of our ESG framework, we maintain a disciplined governance and risk framework through strong oversight, including careful management of risk and compliance, across all of our business activities.



Why does this matter to WELL?

As a rapidly growing company with a decentralized management structure, WELL Health relies on strong governance and processes to manage risk and maintain standards of performance across the business. For WELL, that means rigorous selection and due diligence of potential acquisitions to ensure every company meets specific financial, strategic, and cultural standards, as well as other requirements. It also means careful consideration of which services can be centralized and which can be decentralized to help the business stay agile while maintaining oversight. In the digital health sector, practitioner and patient trust is key, so we make sure we are compliance leaders in our industry and fully comply with all applicable legislation and regulations, and have policies in place to encourage transparency, accountability and strong ethical conduct.

The core principles of disciplined governance and risk framework include:

- Strong and effective corporate governance, including disclosures and reporting, executive compensation and incentives, ownership structure, and board diversity, skills and independence
- Approach to managing risks and opportunities around ethical business conduct, including core values and standards for interactions with employees, practitioners, patients and vendors
- Efforts to ensure acquisitions and suppliers adhere to our ESG priorities through screening, due diligence and engagement.

Corporate governance and **ESG** accountability

This topic focuses on how WELL is governed, including how we manage ESG within the company. We place a high priority on transparent and effective corporate governance, while also remaining agile to support our rapid growth and development. For us, this topic is about having a diverse and experienced board, being transparent about how we operate and providing strong oversight of ESG issues.

Corporate governance

WELL is led by an experienced Board of Directors and Executive Team, who provide leadership across our diverse business units. The Board is responsible for supervising the management of the business and affairs of WELL and is expected to focus on guidance and strategic oversight, including ESG topics, where relevant.

Our Board of Directors is composed of four experienced independent directors and our Chairman and CEO. Our directors bring a range of deep knowledge and experience in the technology and healthcare sectors, as well as in capital markets as investors and advisers.

Additionally, we have three Board committees:

- Audit Committee: Consisting of four directors, this committee is responsible for assisting the Board in fulfilling its financial oversight responsibilities, including reviewing WELL's quarterly/annual financial results and internal control systems
- Compensation Committee: Consisting of three directors, this committee is responsible for overseeing WELL's human resources, succession planning, and compensation policies and practices.
- Governance and Risk Committee: Consisting of three directors, this committee is responsible to assist the Board in fulfilling its corporate governance oversight responsibilities with regard to the identification, evaluation, and mitigation of operational, strategic, and external environmental risks. The Committee has overall responsibility for monitoring and approving the risk policies and associated practices of the Company.

Our overall governance structure, including governance for ESG topics, is summarized in the figure to the right.

Board of Directors

Responsible for managing the activities and affairs of the company, providing guidance and direction, overseeing management, and ensuring good governance

Executive Leadership Team

Responsible for setting the strategy and direction for WELL Health

Chief Sustainability Officer

Accountable for the ESG program and performance, and provides leadership with regard to WELL's ESG strategy and initiatives. Integrated as part of the Chief People Officer's responsibilities

ESG Committee

A cross-functional team of senior leaders that provides guidance and direction of our ESG strategy, objectives and initiatives to ensure our continual pursuit of ESG excellence

Topic leader for: Disciplined aovernance and risk framework

Provide executivelevel accountability, oversight and leadership for each ESG topic within this priority

Topic leader for: Practitioner support and digital enablement

Provide executivelevel accountability, oversight and leadership for each ESG topic within this priority

Topic leader for: Safeguarding patient data

Provide executivelevel accountability, oversight and leadership for each ESG topic within this priority

Topic leader for: A healthy place to work

Provide executivelevel accountability, oversight and leadership for each ESG topic within this priority



Transparency

WELL's disclosure policy sets out our approach to disclosing information, which is focused on ensuring that our information is broadly disseminated in accordance with all applicable legal and regulatory requirements. We also have a managementlevel Disclosure Committee, whose members determine when information is material and should be publicly disclosed.

Acquisitions

We have a strong process in place to assess and manage risks relating to new acquisitions. Our comprehensive due diligence process includes financial due diligence, which is undertaken by an independent third-party advisor for all acquisitions above a certain threshold, as well as screening for several of the ESG topics covered in this report, including privacy, cybersecurity and workplace culture.

ESG accountability

Overall accountability for ESG sits at the executive level with our Chief People Officer and our ESG Committee. The ESG Committee is made up of executives from different parts of

the business, to provide a diverse range of perspectives and facilitate coordination of ESG activities and initiatives. Each of our ESG topics also has its own lead at the executive or management level.

Responsibilities and governance

WELL's ESG Committee, which is chaired by our Chief People Officer, holds overall accountability for this topic at the executive level.

Performance

WELL disclosed key corporate governance information in our information circular, which was distributed to shareholders in advance of our annual general meeting and can be found on sedar.com.

These disclosures include:

- Board committee charters and membership
- Compensation and tenure of board directors
- Compensation of named executive officers
- Compensation approach, philosophy and governance.

everything we do, including complete and accurate financial reporting, honest and reliable communications, and our day-to-day dealings with our vendors, employees and patients."

- Eva Fong, CFO

The following table provides diversity information relating to WELL's Board members and senior executives, in terms of gender, ethnicity and independence.

Diversity information relating to WELL's Board members and executives, 2021

	Board	members	Senior executives ¹		
	Number	Percentage (%)	Number	Percentage (%)	
Gender					
Female	1	20*	2	20	
	4	80	8	80	
Not specified	0	0	0	0	
Total	5	100	10	100	
Ethnicity					
Member of a visible minority	2	40	7	70	
Not a member of a visible minority	3	60	3	30	
Not specified	0	0	0	0	
Total	5	100	10	100	
Independence					
Independent	4	80	-	-	
Not independent	1	20	-	-	
Not specified	0	0	-	-	
Total	5	100	-	-	

¹ Data includes senior executives located at our corporate office in Vancouver, B.C.

^{*} On June 10, 2022 WELL confirmed that it will meet a minimum of 33% female representation on the board by the end of 2022.

Ethics and compliance

WHO WE ARE

As a purpose-driven company, it is important to WELL that we act with integrity in all that we do and ensure we remain a good corporate citizen. We firmly believe all team members across the organization have a shared commitment to building and sustaining a culture of strong ethics and compliance. We have policies and procedures in place to make certain that all our team members act in accordance with applicable laws and regulations.

WELL complies with all relevant legal and regulatory requirements, including all Committee of Sponsoring Organizations (COSO) framework requirements, financial and accounting regulations, and local labour and human rights laws in the jurisdictions in which we operate.

Our expectations of our team members are set out in WELL's employee handbook, including our standards of employee conduct, which all our team members are required to sign. We also have policies in place covering ethics and compliance issues, including a whistleblower policy, an expenditure policy, and a travel and entertainment policy. Additionally, certain business units have their own employee handbooks, which set out additional policies, particularly those that are more specific to a clinical setting. We are currently developing a mandatory staff training program, which will include training in ethics and compliance topics.

Our expenditure policy sets out requirements for purchasing goods and services to ensure that the correct approvals are obtained. For repeat supply arrangements, contracts and agreements may only be signed by business unit owners who must ensure that the contract complies with WELL's policies and procedures.

Responsibilities and governance

WELL's Chief Legal Officer holds overall accountability for this topic at the executive level.

Performance

In 2021, WELL's activities in relation to this topic focused on ensuring legal and regulatory compliance and developing policies and guidance to embed this across the WELL family. In 2022, we will work towards more specific performance reporting on this topic.



Sourcing sustainably and ethically

WELL's network of clinics has significant equipment and medication supply needs, as well as more general products and services. Many healthcare products and services have limited suppliers available, however, we ensure our suppliers meet our minimum standards. Where possible, we continuously seek out opportunities to procure goods and services more sustainably.

We recognize that our procurement practices may have direct and indirect impacts on the environment, communities and workers within our supply chain. We plan to develop a sustainable procurement policy, including a supplier code of conduct, to ensure that our suppliers comply with our ESG requirements and, where possible, contribute toward our ESG goals.

Responsibilities and governance

WELL's Chief Operating Officer holds overall accountability for this topic at the executive level.

Performance

As part of developing our sustainable procurement policy, we are identifying opportunities for formal performance measurement and will be reporting on this topic in future ESG reports.

A WORD FROM WHO WE ARE OUR CEO

OUR ESG PROGRAM

ESG FOUNDATION:

ESG PRIORITY 1:

ESG PRIORITY 2:

ESG PRIORITY 3:



ESG PRIORITY 1

Practitioner support and digital enablement



PRACTITIONER SUPPORT AND DIGITAL ENABLEMENT

Helping practitioners deliver improved health outcomes

WELL is a tech-enabled healthcare company that empowers Canadian physicians with a powerful line-up of digital tools and services we refer to as our practitioner enablement platform.

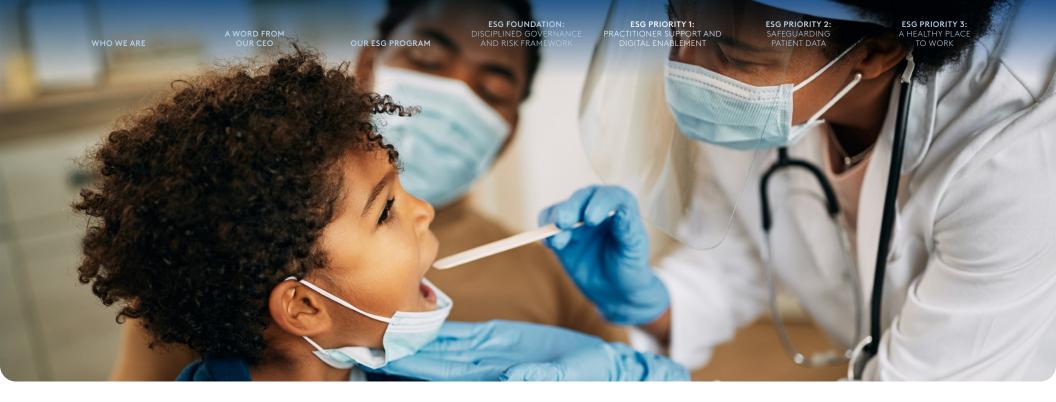


Why does this matter to WELL?

Practitioner support and digital enablement is at the core of WELL's mission, vision and purpose. Everything we do is aimed at empowering healthcare providers with technology solutions that make it easier for them to focus on providing accessible and timely high-quality care to patients, and ultimately improve health outcomes.

The core principles of practitioner support and digital enablement include:

- Enabling practitioners to deliver better patient outcomes and minimize burnout with digital solutions that reduce their administrative burden and provide more flexibility to support the fostering of a better work/life balance
- Enabling practitioners to provide more timely and accessible care so that patients are able to seek the attention they need and avoid any delays in getting a diagnosis, leading to better health outcomes
- Fostering a positive and inclusive healthcare environment, enabling patients to choose a family physician they feel comfortable with, and receive care in safe and private virtual or in-person environments
- Reducing greenhouse gas (GHG) emissions and waste by minimizing the need for physical travel to clinics, as well as the consolidation of supply chain management by utilizing such methods with stringent protocols, protecting patient health information.



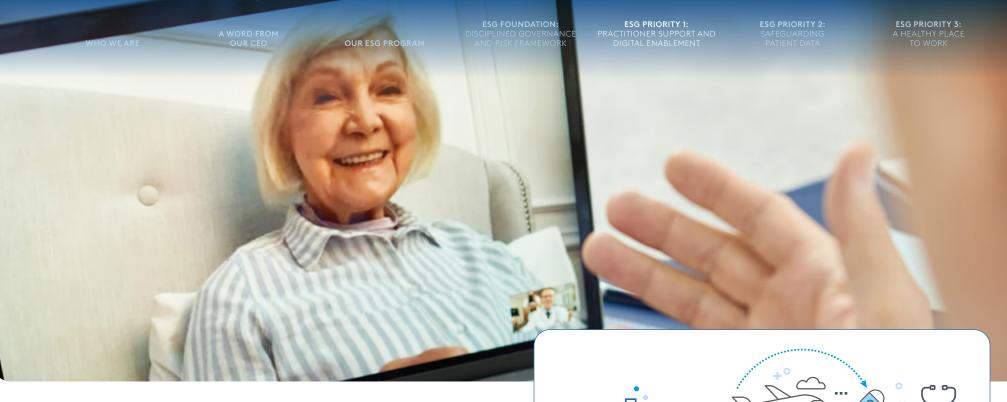
The tools and services offered by the platform are designed to improve clinic efficiency and productivity, interoperability between these tools and their existing clinic systems like electronic medical records (EMRs), physician and patient experiences, and ultimately, health outcomes.

Physicians can access our practitioner enablement platform in a number of ways:

- By joining one of WELL's professionally managed clinics and benefiting from our fully managed suite of digital tools and services that empower them to focus exclusively on care, or
- By accessing an à la carte line-up of these powerful tools and services, including but not limited to a selection of WELL EMRs such as OscarPro, Intrahealth Profile or browsing the apps.health marketplace and selecting from a curated and compelling line-up of service offers and apps, many of which integrate directly into their EMR.

Virtually delivered healthcare has been a hot topic the last few years. WELL's virtual care offerings include our SaaS product VC+ and our highly popular virtual care properties which include Circle Medical and <u>TiaHealth</u>, which allows physicians to set their own schedules and patients to select from a list of physicians with whom they can have a secure telehealth appointment.

- For patients, our virtual care offering means they can avoid the long travel and wait times that can create barriers to accessing healthcare, and they can be seen before their conditions deteriorate. For individuals with mobility challenges, it provides an alternative to in-person care and a simple way to have follow-up consultations, receive prescription renewals and more.
- For healthcare providers, our virtual care offering provides all of the benefits of a professionally managed brick and mortar walk-in clinic, including medical office assistant support, billing management and referral workflow support. It ensures healthcare providers can optimize their schedules so they can spend more time with their patients and less time doing administrative work. As well, it helps by reducing or eliminating wait times, travel times and traditional socio-economic barriers that are often associated with accessing in-person care.
- This virtual model of care delivery also means we can reduce the resource usage associated with providing healthcare, for example by avoiding unnecessary travel for physicians and patients and reducing the amount of waste produced by clinics.



WELL is also pleased to have added Wisp to its overall business in 2021. Wisp is a women's health focused digital health business built predominantly on an asynchronous consultation model. Patients quickly and easily navigate through Wisp's software and workflow, consult with a physician on their ailment and if appropriate are prescribed scripts that can assist them in alleviating their health concern.

The foundation of primary care has always been the patient-physician relationship. In a modern, post-pandemic world, the face of that relationship has changed forever with virtual care, telehealth, text messaging and email now common avenues of connecting patients with physicians. WELL has embraced this shift and we support both our physicians and patients in expanding the medium for the clinical encounter. This will be done in a highly secure and thoughtful way that, unlike a typical phone, can help ensure confidentiality and a consistent virtual consultation environment. Although the healthcare industry has been slower in embracing the adoption of technology, WELL is leading the way in modernizing healthcare, with the goal of improving patient outcomes.

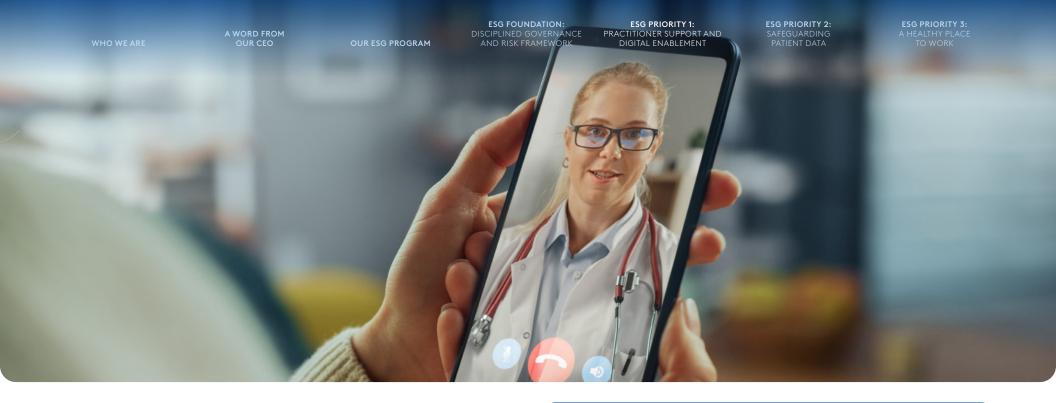
Table title

Number of healthcare practitioners supported by WELL	Canada	United States
Fully managed	1.299	1,018
A-la-carte SaaS and services	17,000+	0



Lending a hand for refugees

MyHealth engaged with the Canadian government to offer medical examinations and associated diagnostics to newly arrived refugees from Afghanistan in August 2021. Within the downtown Toronto core, MyHealth was a provider of choice for telehealth services to Afghan refugees. Staff took the opportunity to create a welcoming environment for their new patients, including, for example, bringing in food to share.



Access to inclusive care

Our focus is to ensure that healthcare is accessible to all. In Canada, where healthcare coverage is close to universal, accessibility challenges can take the form of long wait times, lack of coverage in rural and remote areas, or lack of culturally and linguistically appropriate care options. WELL's virtual care offering helps patients overcome many of these barriers. Additional policies and initiatives, such as diversity training, are in place to help ensure in-clinic care is also inclusive and welcoming to all. In the U.S., access also includes accepting a wide range of commercial and governmental insurances and having financial assistance policies in place for those who need them.

WELL helps to foster a safe and inclusive healthcare environment by enabling virtual patients to select their physician when booking an appointment, which offers patients the choice in selecting a provider based on gender and language spoken or other characteristics that may be important to the patient. For other specialties, including cardiology, sleep and internal medicine, the patient does not select the practitioner. However, the patient or referring physician may request a specific language spoken, geographical area or medical focus of expertise. The MyHealth Centre utilizes an interpretation service for all patients requiring language assistance. The interpreters

Going virtual to support mental health

Virtual mental health visits increase accessibility, as backed by WELL's data, suggesting that patients seeking support for mental health issues exhibit a strong bias for virtual care, with 68 per cent of mental health visits occurring via virtual care compared to 45 per cent for all visits. WELL's growing portfolio



of virtual tools and technologies, including services offered by Focus Mental Wellness, one of WELL's venture investments, enable practitioners to rapidly deploy behavioural healthcare services to a geographically widespread and increasingly isolated population. The benefit of a shorter access time for virtual care is essential for mental healthcare, especially for those in crisis. Virtual care can also help to remove the stigma historically attached to accessing mental healthcare, while reducing transportation barriers and improving convenience.

are also virtual and accessed on-demand, ensuring the information is timely, delivered clearly and articulated accurately to patients. This eliminates possible language barriers and provides greater access to a provider with strong cultural competence and an understanding of diverse cultural backgrounds. Virtual care also eliminates physical barriers to safely access a bricks and mortar clinic and care, especially for patients who are elderly, immune-compromised or have mobility concerns.

MyHealth and CRH have their own policies and processes in place to ensure clinical environments that they operate in are accessible to a diverse range of patients, including accessible design standards for new clinics and mandatory staff training programs. CRH is also fully compliant with Section 1557 of the U.S. Patient Protection and Affordable Care Act (which prohibits discrimination on the basis of race, colour, national origin, sex, age or disability), accepts a broad range of private and governmental insurances (Medicare and Medicaid) at ambulatory surgery centers, and maintains financial assistance policies and payment plans to help patients receive necessary clinical care.

Virtual access

For working patients or patients with families, getting to a clinic during traditional business hours can be challenging. WELL's telehealth platforms on both sides of the border enable extended hours giving patients the flexibility of booking appointments at a time most convenient for them. Across WELL's patient service businesses, patients are also seen virtually and in-person on evenings and weekends. Virtual care also benefits patients living in more remote communities who may not have regular access to primary and specialty care providers.

Although virtual care has many accessibility benefits for patients, digital technologies can be a barrier for some. As a result, we also have programs in place to give those patients who do not have access to advanced technology or the internet the option to receive consultations over the phone. Additionally, all WELL clinics continue to offer in-person care for patients who prefer to physically travel to a clinic to access our virtual care.

US-based full-stack primary care

Circle Medical, one of WELL's US-based businesses, is a fullstack primary care network that offers patients a blend of virtual and in person primary care appointments across a rapidly growing US network.



Circle's digital-first experience starts with its mobile app which is a required part of the patient experience. It lets them manage their insurance, scheduling, medical records, as well as message their provider or care team. Many, even most appointments can take place via secure video from the comfort of patients' homes, workplaces, or wherever.

Patients connect with Circle when they are sick, but also when they are well. Circle helps develop preventive plans to keep patients healthy when they are not sick. They take care of it all including corresponding with others in a patient's healthcare team including pharmacies, labs, and specialists.

Helping patients to be seen more quickly

WELL Health subsidiary CognisantMD's Ocean platform is improving access to care through its online booking platform, making it easier for patients to book appointments online at their convenience. Over 215,000 patients can now access patient care more quickly and easily with online booking



through the Ocean platform, based on the average number of patients per online schedule and the total number of schedules. Ocean's Healthmap is also improving patient transparency and accessibility by automatically tracking and measuring wait times for referrals, helping patients to better understand the care options available to them. Ocean tracks and publishes real-time wait times for more than 1,100 specialists and healthcare services.

Responsibilities and governance

Our Chief Medical Officer holds overall accountability for this topic at the executive level.

Performance

WHO WE ARE

WELL's performance in access to inclusive care in 2021 is summarized in the following table.

Access to inclusive care in 2021

Indicator	Performance at WELL clinics in B.C. ¹
Percentage of appointments held virtually	60%
Average time to access a virtual appointment	0.3 days
Average time to access an in-clinic appointment	4.6 days

1 All data was collected in 2021.

Ensuring patient safety and quality of care

In Canada and the U.S., practitioners are licensed at the provincial or state level and are required to meet professional and regulatory requirements in order to practice medicine. This means that, for WELL, ensuring patient safety and quality of care is primarily about ensuring the right policies and procedures are in place to enable practitioners to do their jobs as effectively and safely as possible.

Ensuring quality of care

All practitioners within the WELL family are licensed by the relevant professional body (for example, the College of Physicians and Surgeons of B.C. or the Canadian Association of Radiologists) and undergo a criminal record check prior to employment. Across the WELL family, we also perform criminal background checks on all new hires. Existing and long-tenured employees are not obligated to complete this background process, but they are highly encouraged to do so. All physicians are requested to complete an annual credentialing process, which includes the request and validation of an array of information. Unique to WELL's Canadian focused omni-channel primary care service, many practitioners, including those providing



Ensuring all patients are helped

Through WELL's Fast Track program, patients who come to one of our primary care clinics that has no remaining appointments available can still be seen that same day



through virtual appointments accessed from the clinic. WELL matches patients to a practitioner with virtual availability, and clinic staff help to facilitate bookings so any technological or communication barriers are minimized or eliminated. This means even those patients who experience barriers to accessing virtual care can still receive the benefits of shorter wait times. Unlike when a patient is seen virtually while at home, patients who are booked via Fast Track have access to supportive on-site services provided by medical office assistants, such as blood pressure readings and temperature checks.

In the event a patient visits MyHealth without a requisition and we are unable to connect with their primary general practitioner, we then offer the patient the opportunity to connect with another general practitioner who is available virtually on MyDoctor Now to obtain a new requisition for their procedure. This is incredibly convenient for the patient as it avoids delays in healthcare delivery. primarily virtual care, are affiliated with a physical clinic so their patients can benefit from continuous care with referrals for in-person appointments and follow-ups when needed. In some instances, a virtual appointment may not be sufficient to reach a diagnosis. In those cases, and regardless of whether the practitioner is affiliated with a physical clinic, the patient can be referred for an in-person appointment, at a WELL physical clinic, to ensure they receive the appropriate level of care. WELL has worked with the College of Physicians and Surgeons of B.C. to ensure our hybrid model meets all clinical requirements...

WELL also undergoes independent audits to validate our policies and processes. These include the physician practice enhancement program, which focuses on ensuring safe, competent and ethical care for patients, as well as physician office medical device reprocessing assessments, which focus on safe reuse and reprocessing of reusable medical devices.

MyHealth is the only independent health facility to be accredited with a commendation from Accreditation Canada, which speaks to the high degree of infection prevention and control. The Ontario Society of Cardiologists requested our quidance regarding how we developed our policies, which led to a collaboration to provide support to other cardiology offices throughout the province in developing their policies as well. By way of example, throughout the pandemic, our successful high-prevention and control measures have resulted in no workplace outbreaks at MyHealth throughout the pandemic.

Patient satisfaction

WHO WE ARE

All clinics have a process in place to obtain patient feedback. The majority of our clinics send text messages requesting feedback shortly after each appointment. Any concerns relating to quality of care are escalated either to the practitioner in question or to a separate quality lead or advisor. Patients are also able to file quality-of-care complaints with the relevant professional body, which triggers a formal process that may include remedial training for the practitioner, technologist or any other healthcare professional involved.



Ongoing improvements bring better patient experiences

CRH Medical places a strong emphasis on quality management and continuous improvement. Its O'Regan System is ISO-certified and subject to a rigorous quality management system, which includes ongoing process improvement, audits and tracking of any patient complaints. CRH O'Regan medical directors and clinical support specialists provide comprehensive hemorrhoid banding training to ensure clinical efficacy and to minimize complications, and Medical Directors provide 24/7 clinical support. Meanwhile, CRH Anesthesia maintains a Quality Management Council tasked with monitoring patient safety and quality improvement initiatives for the clinical enterprise, including various key performance indicators for quality of care. Any reportable events and sentinel events are immediately escalated to the assigned corporate medical director and senior operations leadership, who analyze the event to determine the root cause and any necessary proactive measures that need to be implemented to prevent any possible reoccurrence. Thanks to this emphasis on quality and improvement, as of October 2021, over 90 per cent of patients gave CRH a top rating in feedback surveys (i.e. a rating of five out of five).

Infection control

WHO WE ARE

WELL clinics have taken steps to limit the risks of COVID-19 on patients. As well as offering virtual care options to limit the numbers of patients required to visit clinics and reduce wait times, we have also implemented measures in clinic, including:

- The Safe Entry Assistant for COVID-19, an easy-to-use tool for patients to selfscreen for COVID-19 symptoms before they enter the clinic
- Digital self-check-in, which enables patients to check in from their smartphone without needing to enter the clinic, thereby helping to limit the number of patients in the waiting room and reducing the risk of COVID-19 exposure. Across the WELL family, most of our clinics have digital tools that enable patients to check in and join a virtual line queue. When it is their turn, patients receive notifications via text messages and the app to enter the clinic, which minimizes long wait times for patients and increases efficiencies for clinics.

Responsibilities and governance

Our Chief Medical Officer holds overall accountability for this topic at the executive level.

Performance

WELL's performance in ensuring patient safety and quality of care in 2021 is summarized in the following table.

WELL's patient safety and quality of care performance in 2021

Indicator	2021 performance
Percentage of WELL clinics passing a third-party quality audit ¹	100% (eight clinics underwent quality audits in 2021)
Average patient review score ²	N/A

- 1 Applies to clinics directly controlled by WELL.
- 2 To be measured and reported in 2022.

GHG emissions and resource management

GHG emissions and resource management refers to WELL's environmental impact, including GHGs emitted and avoided, waste production and diversion from landfill, safe hazardous waste disposal and energy efficiency. As a healthcare provider, we acknowledge that there are difficulties in minimizing material use due to medical requirements. For example, many types of medical waste are non-recyclable and are required to be single-use in order to maintain sterilization. However, we continuously identify and pursue opportunities to minimize resource consumption, reduce waste generation, and track and manage the environmental footprint of our operations.

How virtual care supports environmental sustainability

WELL's business model inherently supports reductions in the environmental footprint of healthcare, as we focus on enabling more patient-facing and back-office services to move online. This helps to reduce the amount of GHG emissions from travel required by patients and practitioners (i.e. our scope 3 emissions), as well as the amount of waste produced in-clinic. It should be noted that digitization has its own environmental impacts, primarily in the form of emissions related to energy consumption from IT hardware infrastructure, such as data centers (i.e. our scope 2 emissions) and waste generation.

In 2020, a high-level analysis of these competing impacts and benefits was completed by the University of Toronto's Centre for Sustainable Health Systems. As a result of replacing fuel inefficient cars with relatively low-emitting electricity in Canada, the University estimated that if 50 per cent of in-person health visits across Canada were replaced by virtual visits, carbon emissions would be reduced by 325,000 metric tons, which, according to the University, is equivalent to taking more than 70,000 passenger vehicles off the road for a year. This has reaffirmed WELL's belief that adopting a virtual care model where possible will have a material impact on the healthcare sector's climate impacts.

Another way our business model helps to reduce the environmental footprint of our healthcare services is through paper and material consumption. Virtual consults and the subsequent digital paperwork eliminate the reliance on and need for using paper to document information. Across the WELL Health family, practitioners and patients can view multiple digital records, transactions and reports to help reduce paper while digitizing the processes. It is WELL Health's goal to reduce paper, faxes and nonvalue-added processes for the benefit of the world we live in to ultimately reduce our environmental footprint.

WELL's own environmental footprint

WHO WE ARE

WELL is committed to taking steps towards better understanding and managing our environmental footprint. As part of these ongoing efforts, we will continue to pursue initiatives to improve the efficiency of our resource usage and eliminate waste across the WELL family. As examples, centralization of the supply chain has allowed for efficiencies and reduced waste in our clinics, and our head office is now almost entirely paperless. One of the major sources of paper usage in clinics is payroll activities, and by moving many practitioners to electronic payments, payroll methods, pay stubs and hours tracking, we have made a significant contribution towards reducing paper usage across the whole business. As well, we have focused our marketing efforts primarily on digital and social media, considering the accessibility, effectiveness and support they provide in helping to reduce our paper consumption.

In addition, individual clinics are encouraged to take sustainability into account when purchasing goods and services. Some examples of how this has been operationalized include replacing older X-ray machines with more energy efficient models, eliminating paper from ECG machines, and reducing the use of radio isotopes in camera equipment.

Responsibilities and governance

Our Chief Operating Officer holds overall accountability for this topic at the executive level.

Performance

In 2021, WELL's performance measurement for this topic was limited to specific initiatives aimed at reducing our resource usage, which are highlighted above. In 2022 and beyond, we will work towards more comprehensive tracking of our environmental footprint, with the aim of reporting formally on this in the future.



Reducing paper use and improving wait times through eReferrals

The Ocean eReferrals system is reducing the number of paper faxes used in Canadian clinics, helping to reduce impacts on the environment while also limiting the risk of lost or delayed patient referrals and improving referral wait times. Approximately 420,000 fax pages are eliminated each month thanks to Ocean eReferrals, based on an average of 10 pages faxed back and forth for every patient referral. The eReferrals system has also been proven to reduce processing time for referrals by 35 days compared to faxed referrals, helping to reduce overall wait times for patients and improving accessibility.





SAFEGUARDING PATIENT DATA

Passionate about data security

Safeguarding the privacy and security of our patients' data while empowering them to proactively leverage their health information is a core element to achieving our mission to positively impact health outcomes.



Our goal is to improve the standard of data protection available to the healthcare industry as a whole, and as a digitally enabled healthcare company, we have a responsibility to patients to keep their data safe and secure and protect their privacy. At the same time, we see opportunities to help patients leverage insights from their data so they can be more proactive in managing their own health.

The core principles of safeguarding patient data include:

- Implementing safeguards to protect the integrity, confidentiality and availability of patient health information
- Complying with the privacy regulations of the jurisdictions we operate in
- Elevating the level of cybersecurity and patient data protection among acquisitions and practitioners accessing our software
- Championing responsible innovation to help patients be more proactive in their own care (democratization of health data).

ESG PRIORITY 1: PRACTITIONER SUPPORT AND DIGITAL ENABLEMENT

ESG PRIORITY 2: SAFFGUARDING PATIENT DATA

ESG PRIORITY 3: A HEALTHY PLACE TO WORK

With cyberattacks against the healthcare industry on the rise, it is now more important than ever to take the safety and security of patient healthcare information seriously.

WHO WE ARE

In 2019 alone, over 41 million healthcare records were compromised by criminals. Moreover, there are approximately 4,000 ransomware attacks each day. In fact, the healthcare industry experiences two to three times more attacks than other industries, and is under attack from hackers seeking patient healthcare information (PHI).

WELL and our cybersecurity businesses, Cycura and Source 44, recognize that cybersecurity is somewhat foreign to most clinicians. Our managed service offering has been designed to provide third-party clinics with the fundamental tools needed to protect their business against attacks. WELL also employs these same tools in our own network of clinics in an effort to protect PHI, as well as our healthcare providers and patients.

Privacy and data protection

WELL has a comprehensive suite of data security policies and processes to help protect the confidentiality of patient health information. Our employee acceptable use policy and bring your own device policy help protect the WELL network against outside cybersecurity threats, while our breach and incident response plan sets out clear steps to respond to any cybersecurity incident that may arise. We also have a medical practice and records policy, as well as an access to personal Information policy and procedure, both of which contain specific guidance and protections around accessing personal and medical information. Our policies are complemented by a cybersecurity monitoring platform that helps us detect suspicious activity, correlate it with threat intelligence data, and trigger early notifications and responses.

We have embedded data privacy and cybersecurity into our business strategy, which has enabled us to acquire two leading cybersecurity companies, Cycura and Source 44, to provide customized cybersecurity services to our business units and functions.

In addition, one of our largest business units that delivers anesthesia services at ambulatory surgical centers across the U.S. - CRH Medical - operates best-in-class data security and is compliant with the Health Insurance Portability and Accountability Act (HIPAA) and the Health Information Technology for Economic and Clinical Health Act (HITECH). CRH's overarching compliance plan also maintains privacy and data protection policies that are compliant with the Office of the Inspector General.

All WELL Health staff, including practitioners, complete mandatory annual third-party training in cybersecurity, which provides comprehensive cybersecurity information and ensures everyone working at WELL understands their role in keeping patient information safe.

Improving data security one clinic at a time

A central element of our approach to privacy and data protection is to provide the investment necessary to elevate cybersecurity standards at every clinic that joins our network. Prior to adding any virtual or physical clinic to our network, we conduct a formal due diligence process to ensure a potential acquisition target does not represent a cybersecurity threat. Our clear and detailed due diligence process sets out key workflows and authorizations at each stage of the contractual process. This culminates in the identification of required closing conditions to enable the acquisition to proceed, followed by an IT integration process if the conditions are met and the deal goes ahead. Other less critical items identified during due diligence are recorded in our corporate risk register and monitored following the acquisition. If we do not believe the target company's cybersecurity risk profile can meet our standards, we will reject the opportunity on this factor alone and have done so on numerous occasions in the past.

"WELL invests significant time and money into improving the cybersecurity approach of our own clinics, alongside the security services we sell to clinics outside our network. Those improvements make a real difference to the security of patient data."

- Iain Paterson, CISO

Improving data protection within the healthcare sector is a core part of WELL's mission. Many traditional clinics are small businesses that lack the resources to invest in adequate cybersecurity solutions. In fact, they are often not fully aware of the real world risks they face and the responsibilities they have for securitizing their patients' data. As a result, when WELL acquires these types of clinics, we typically make material and significant improvements to the level of protection used to secure the data. As an example, one prospective target clinic was found to have such compromised security that their IT was being used to mine bitcoin, unbeknownst to staff. Prior to our acquisition of this clinic, WELL made a significant investment to remove unwanted malware and bring the clinic's protection up to our high standards.

Safe and reliable innovation

WHO WE ARE

Although digitization of health data comes with manageable risks, we see opportunity in empowering patients to better understand and use their data to be more proactive in their own care and ultimately to drive positive health outcomes. WELL believes the future of healthcare will allow both practitioners and patients to make appropriate use of healthcare data to improve health outcomes.

Responsibilities and governance

Up until May 2022, WELL's Chief Operating Officer held overall accountability for this topic at the executive level. Following that date, the Chief Information and Security Officer (CISO) became accountable. For each entity and business unit within WELL Health, one employee is responsible for data privacy and security. Together, these individuals form a central Cybersecurity Committee, whose members receive regular reporting against key performance indicators from across the company. The Board of Directors also receives quarterly reports on cybersecurity as part of its regular operational updates. We are continually working to build and improve on our cybersecurity approach and, in 2022, are planning to initiate separate, dedicated oversight from the Board on this topic.

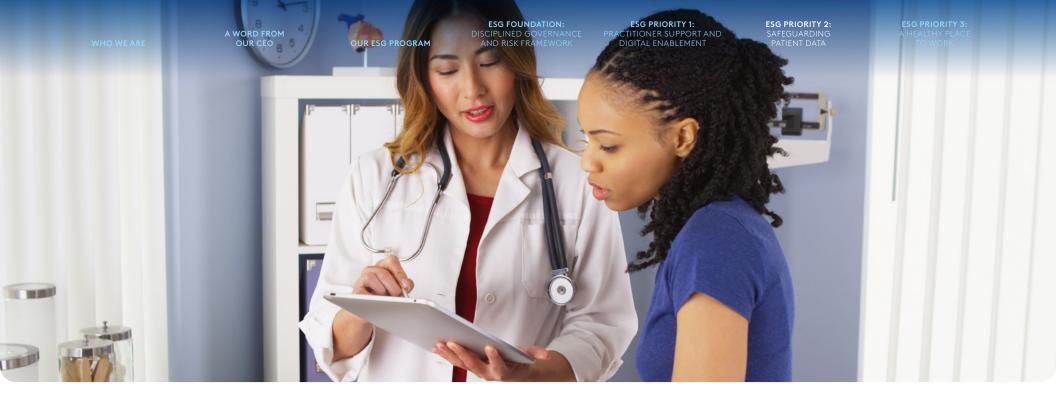


Providing secure access to data on Apple iOS

In May 2021, WELL Health became the first Canadian electronic medical records (EMR) and telehealth platform to partner with Apple to offer Apple Health Records to patients in Canada. Health Records on iPhone allows patients to securely view and store their own available medical records from multiple providers right in the Apple Health app on their iPhone, providing a centralized view of their allergies, conditions, immunizations, lab results, medications, procedures and vitals. Patient privacy and data is protected at all times, with downloaded health records data encrypted in Apple Health Record using the user's iPhone passcode, touch ID or face ID.

"Providing patients with an easy and convenient method to get access to their available health records right on their iPhone can help them more actively participate in their health, leading to better health outcomes and a higher patient understanding of their own overall health status."

- Hamed Shahbazi, Founder and CEO



Performance

WELL's performance in privacy and data protection in 2021 is summarized in the following table.

WELL's privacy and data protection performance in 2021

Indicator	2021 performance
Percentage of companies in WELL's EMR Group that are certified in ISO27001, ISO13284 or ISO13485	100%
Number of reportable data breaches	0
Monetary losses as a result of legal proceedings associated with data security and privacy	\$0
Percentage of registered ¹ WELL Health employees who completed training in cybersecurity	81%
Number of healthcare practitioners protected in WELL's platform	21,000+
Number of patients' personal information protected ²	23+ million ²

¹ Registered refers to registration for WELL Health's training platform. Some entities were acquired by WELL in 2021 but had not yet completed the IT integration process by the end of the year; their employees were therefore not able to participate in corporate training in 2021.

 $^{2\,\}hbox{This number has not been de-duplicated across different EMR platforms due to patient privacy concerns.}$





A HEALTHY PLACE TO WORK

Caring for our team

Our objective is to continuously make WELL an even healthier place to work by upholding a culture built on respect that reflects the diversity of our people and the communities we serve, prioritizes health and well-being, and empowers our team members, including our employees, consultants and healthcare providers, to be the best they can be.

Healthcare professionals have faced incredible challenges to their health and well-being, especially during the pandemic, and we believe it is essential to do everything we can to maintain a healthy workplace to ensure our team members are safe and empowered. A critical part of creating a healthy workplace is fostering a culture of respect, where all team members feel valued, included and supported to be the best that they can be.

The core principles of a healthy place to work include:

- Building a diverse workforce in terms of race, gender, disability, sexual orientation and spiritual beliefs, and a culture that values the unique contributions of all team members
- Caring for the caretaker by reducing rates of workplace injury and illness (including mental health issues and burnout) through training, proactive management and measures to alleviate the administrative burden on practitioners
- Ensuring continued availability of skilled top talent through recruitment, attraction, development and retention programs and policies.

In 2021, Shane Sabatino joined WELL as the Chief People Officer. With more than 25 years of experience, Shane's leadership is resulting in the design and implementation of programs and policies that ensure WELL is a healthy place to work. One of Shane's first tasks was to launch our comprehensive ESG program, much of which has been captured in this ESG report. As an integral part of our growth strategy, our ESG journey continues to be one of authenticity and alignment with WELL's purpose-driven approach to transform the world for the better. In fact, it is our shared commitment to this approach and to ESG excellence that units our team, partners, practitioners and shareholders.

Diverse, equitable and inclusive workplace

Having a diverse, equitable and inclusive workplace is particularly important to WELL because we recognize that the best way for us to serve our diverse patient communities is by reflecting that diversity within our own organization. That means recruiting and developing employees from diverse backgrounds, while also upholding a safe and respectful work environment where discrimination and harassment are not tolerated.

Recruitment

When it comes to diversity, WELL leads by example. Throughout our organization, we bring together teams with a wide range of backgrounds, knowledge and experience. For us, it begins in our recruitment process where every position we advertise is accompanied by a statement of equal opportunity that summarizes our ethos:

WELL is committed to supporting a diverse, inclusive and accessible workplace. We welcome and celebrate the diversity of our team members across ability, race, gender identity, sexual orientation and perspective. We strive to create an inclusive workplace where differences are celebrated and fuel our success - this is the WELL way.

An inclusive workplace

Our workplace violence, discrimination, bullying and harassment policy sets out our approach to preventing and responding to discrimination and harassment in the workplace, and applies to all of our team members, contractors and consultants. It includes a formal reporting and investigation procedure for instances of recurring workplace violence, discrimination, bullying or harassment. Every team member deserves to work in a respectful and psychologically safe environment; this is a basic right across the WELL family.

"One area where I want WELL to stand out is in the emphasis we place on the health and well-being of our team members -Healthcare is our sector."

- Shane Sabatino, **Chief People Officer**

A culture of inclusion

MyHealth has established a scholarship at the Michener Institute at the University Health Network (UHN) for Black students in financial need who can demonstrate a commitment to furthering Black community involvement and a desire to enhance Black lives through their education and career choices. This scholarship is part of MyHealth's commitment to supporting a more diverse pipeline of talent in the healthcare sector. MyHealth's culture of inclusion can also be seen in the responses to its Great Place to Work employee culture survey, where over 90 per cent of respondents agreed that, at MyHealth, people are treated fairly regardless of their race, ethnicity, gender or sexual orientation.



Responsibilities and governance

Our Chief People Officer holds overall accountability for this topic at the executive level.

Performance

WHO WE ARE

A breakdown of the diversity of WELL's team members in terms of gender and age is included in the tables below.

Breakdown of WELL team members by gender and generation, 2021

(%)		Team mem	bers by gender			Team	members by gene	eration	
Category	Female	Male	Not specified	Total	Baby boomers (born from 1946 to 1964)	Generation X (born in 1960s and 1970s)	Millennials (born in 1980s and 1990s)	Generation Z (born in late 1990s and early 2000s)	Total
All team members ¹	64.88	35.08	0.04	100.00	15	36	40	8	100
By employment group									
Clinicians ²	69.73	30.27	0.00	100.00	18	39	36	7	100
Employees	50.76	49.08	0.15	100.00	8	30	10	51	100
By position type									
Board members	20.004	80.00	0.00	100.00	40	60	0	0	100
Executive team members	19.15	80.85	0.00	100.00	14	39	48	0	100
Directors and managers	63.81	36.19	0.00	100.00	11	44	45	1	100
Employees	63.93	35.93	0.14	100.00	7	26	51	16	100
Practitioners ³	66.85	33.15	0.00	100.00	20	41	35	5	100
By business line									
Corporate	32.31	67.69	0.00	100.00	12	37	37	14	100
Omni-channel patient services	69.60	30.35	0.05	100.00	18	40	35	7	100
Virtual services	52.33	47.67	0.00	100.00	7	25	58	10	100

¹ Data includes all employees, healthcare providers and consultants within WELL and its subsidiaries, except for some practitioners of a few subsidiaries. For entities acquired during 2021, data refers to the period following acquisition.

² Clinicians include all healthcare providers and those in support roles, such as clinic managers and medical office assistants.

³ Practitioners include those who are licensed or authorized to provide healthcare services, such as doctors, nurses and allied health professionals.

⁴ On June 10, 2022 WELL confirmed via an official press release that it would increase female board representation to a minimum of 33% by the end of 2022.



Health, safety and well-being at work

The healthcare sector is one of the most exposed sectors in terms of risks to the health, safety and well-being of team members. This has been more evident than ever during the COVID-19 pandemic, which has seen high levels of sickness and burnout among practitioners in particular. WELL seeks to prioritize creating a healthy workplace for all, and we have a growing number of initiatives in place to promote the health, safety and well-being of our people, so they can keep taking care of themselves and others.

Protecting our people in the workplace

WELL's health and safety approach is set out in our employee handbook. Supervisors are responsible for ensuring that team members use safe work practices and receive training in health and safety, while team members have the right to refuse any work that they feel is unsafe or could lead to injury. WELL employs a health and safety representative who is the first point of contact for any health and safety questions or incident reporting.

Providing proactive protection

To protect team members working in its clinics as effectively as possible, MyHealth implemented a dynamic response to COVID-19 that continued to evolve as more information about the virus became known. Measures that protect staff and patients include:

- Screening for symptoms upon arrival
- Restricting the circulation of patients suspected of having COVID-19 within clinics
- Daily infection control checklists
- Regular COVID-19 testing of staff
- Hand hygiene audits, in which staff achieved a 91 per cent success rate in 2021
- Adaptation of staff protocols to limit gatherings.

This comprehensive approach helped to ensure that, in 2021, no COVID-19 outbreaks were observed in any of MyHealth's 47 clinics, despite COVIDpositive patients being treated in person throughout the pandemic. This proactive approach to safeguarding team members' health and well-being is just one example of a broader positive culture that led to MyHealth being re-certified in 2021 as a Great Place to Work for the fifth year in a row.

As described earlier, under Ensuring patient safety and quality of care, we have strong protocols in place to minimize COVID-19 transmissions during the pandemic, using a range of procedures and innovative digital tools. We have also employed technology to implement measures that save time for clinic staff and reduce the administrative load on clinics, which are key contributors to burnout.

OUR ESG PROGRAM

For example, we have:

- Implemented COVID-19 protocol guidelines and a full vaccination policy at our head office
- Introduced online appointment booking to reduce demand at the front desk or on the telephone, which is estimated to save between two and five hours of staff time each day and lessens possible exposure to potential illness.
- Piloted interactive voice response (IVR) for incoming calls to reception, which early results suggest could save as many as eight hours of staff time a day, and reduced exposure to illness.

Mental health and well-being

WELL offers a range of well-being initiatives, available to all team members and business units, to help team members stay physically and mentally healthy. Some of our well-being offerings include:

- EPIC: Employee program inspiring culture (EPIC) is our workplace culture program that aims to create a fun, healthy and collaborative culture at WELL. EPIC initiatives include social events, a recognition program for team members, and health and wellness activities. EPIC is led by, and includes programs designed by, internal team members FOR internal team members, as they are best equipped to know what is needed and desired by our team.
- **Bright** well-being program: WELL has invested in Bright, a company that provides technologically enabled solutions for team member well-being, such as virtual mindfulness, nutrition, yoga and fitness classes, which are available to all WELL team members, including all healthcare practitioners.
- Focus Mental Wellness health program: WELL has invested in Focus Mental Wellness and has launched a mental health program to support all members of WELL in Canada, ensuring that all team members have access, and provided the first appointment free of charge so team members have immediate access to therapists as and when needed.
- Learning sessions: WELL hosts mental health learning sessions throughout the year to ensure all leaders and team members have extra support to deal with mental health issues in their day-to-day lives. Managers are provided with tools and development to assist their team members in finding the help they require,

Launching WELL Day

In September 2021, we introduced our first WELL Day, demonstrating our support for Canada's Indiaenous community, as well as generally supporting our team members' health and well-being on the first National Day for Truth and Reconciliation. While WELL was not



required to institute a day off as we are not a federally regulated company, we chose to do so in support of the first National Day for Truth and Reconciliation. To kick off our first WELL Day, we were honoured to welcome Chief Billy Morin from Enoch Cree Nation to speak to our team members about his perspective on reconciliation. Team members were encouraged to spend the remainder of the day engaging in personal reflection, education and awareness activities, or participating in events within their local communities, such as, Orange Shirt Day.

either in the moment or through a certified therapist, as well as any additional support that may be needed.

• Paid time off: WELL believes that time away from work is crucial and offers paid time off to give team members an opportunity to recharge when and as needed. Team members are provided with six additional paid days off per year (eight to team members in B.C.). These include three paid sick days (five in B.C., based on legislative requirements), two family days, one volunteer day and one WELL Day, which was implemented in 2021 to demonstrate support for the National Day for Truth and Reconciliation.

Responsibilities and governance

WELL's Chief People Officer holds overall accountability for this topic at the executive level.

Performance

In 2021, WELL's performance measurement for this topic was limited to specific initiatives, which are highlighted above. In 2022 and beyond, we will work towards more comprehensive tracking, with the aim of reporting formally on this topic in the future.



Employee recruitment, attraction, development and retention

This topic comprises a wide range of areas covered by our People and Culture function, including recruiting and developing talent, compensation and benefits, employee recognition, performance management, work-life flexibilities and employee engagement. All of these areas are critical for WELL, particularly as a geographically diverse company that spans across technology and healthcare, two sectors that face strong competition for talent. We aim to attract, retain and develop talented people by supporting and empowering them to be the best they can be within a healthy place to work.

With the growth of all areas of our business comes a high demand for recruiting and securing quality talent. In the fourth quarter of 2021, WELL added a talent acquisition specialist to the People and Culture team to provide dedicated support to these demands. We also aligned our strategies with WELL's Marketing team to expand recruitment efforts through our social media platforms. In 2021, our WELL team grew by just over 2,100 members (approximately 1,800 from acquisitions and 300 from organic growth). In addition, we welcome a number of co-op students and interns at our head office and subsidiaries each year to provide them with an opportunity to gain valuable work experience.

Focusing on people first

Looking after our team members is a top priority for WELL because we believe happier team members lead to happier practitioners and patients. In 2021, we hired our first Chief People Officer to lead WELL's People and Culture objectives and spearhead our ESG program. We also tripled the size of our People and Culture team and continued to build a world-class HR shared services program for our rapidly growing team, including putting key policies in place, such as a flexible work policy.

In 2022, we are introducing a number of additional initiatives to support WELL's team members across all our business units, including:

- The expansion of our mental health program for all team members of WELL, including healthcare providers in Canada, and the provision of a free month of services. We will also be hosting workshops on mental health to promote awareness and provide support to our team members
- The implementation of a company intranet designed to enhance communication with our team members through the sharing of company news and timely information

- A comprehensive suite of HR policies and processes, including a remote work policy to empower team members to work more flexibly where and when appropriate
- An expanded mandatory training program for all team members
- A career planning program to support retention and development
- An employee engagement offering at MyHealth that includes implementing a world-renowned employee survey to give us an enhanced understanding of the areas of focus needed to ensure a healthy place to work. The findings will also provide us with greater insight and access to action plans regarding diversity, inclusion and equity.

Compensation philosophy

WHO WE ARE

We ensure our compensation for our team remains competitive and equitable, while encouraging a pay-for-performance mindset that prioritizes rewarding our top talent. Our ability to include equity in our total compensation is one of the tools we use to attract talent and differentiate our offer packages. WELL firmly believes that the more we promote ownership among our team members, the more they support the constant and never-ending improvement of WELL, which in turn benefits our practitioners, patients, customers and other team members. Culture and engagement

A key priority for WELL is our working culture. We are a purpose-driven company and firmly believe that engaging our people in our purpose and mission is critical to our success. One way we do this is by conducting target company cultural assessments of all potential acquisitions before finalizing a deal, and then implementing a cultural integration process that respects the existing culture of the business in question but also helps to ensure that all parts of our business work collaboratively and cohesively together. This process includes activities such as welcome sessions and meet-andgreet events with the teams. At the same time, we emphasize respect across our whole business, providing team members with a work environment that lets them be the best that they can be.

Employee volunteering

An important part of building a purpose-driven culture at WELL is supporting our team members to give back to their communities in ways that matter to them. To date, WELL has pledged one per cent of our employees and consultants time for social causes that are important to them. This equates to more than 3,860 volunteer hours if fully utilized, and support our team members to spend one per cent of their hours worked every year volunteering in their local community.

Responsibilities and governance

WELL's Chief People Officer holds overall accountability for this topic at the executive level.

Performance

WELL's performance in employee recruitment, development and retention in 2021 is summarized in the following table.

WELL's employee recruitment, development and retention performance in 2021

Indicator	2021 performance
Total number of WELL team members ¹	2,892
Number of WELL health care practitioners (inclusive of doctors and clinicians)	2,300
Number of WELL employees	592
Turnover rate ²	WELL Health HQ: 11% Overall 17%
Total number of volunteer hours available to WELL team members through the one per cent pledge ³	3,868

- 1 Data includes all employees, healthcare providers and consultants within WELL and its subsidiaries.
- 2 Data applies to non-healthcare providers only and WELL HQ and subsidiaries that were a part of WELL for the whole year
- 3 Based on hours worked.



WELL Health Technologies Inc.
Suite 550 – 375 Water Street
Vancouver, British Columbia
Canada V6B 5C6
well.company