

Form **8937**
 (December 2017)
 Department of the Treasury
 Internal Revenue Service

Report of Organizational Actions Affecting Basis of Securities

OMB No. 1545-0123

▶ See separate instructions.

Part I Reporting Issuer

1 Issuer's name		2 Issuer's employer identification number (EIN)	
lora Health, Inc.		45-3514434	
3 Name of contact for additional information	4 Telephone No. of contact	5 Email address of contact	
Investor Relations	(415) 814-0927	stockquestions@onemedical.com	
6 Number and street (or P.O. box if mail is not delivered to street address) of contact		7 City, town, or post office, state, and ZIP code of contact	
One Embarcadero Center, Suite 1900		San Francisco, CA 94111	
8 Date of action		9 Classification and description	
September 1, 2021		Class B Common Stock	
10 CUSIP number	11 Serial number(s)	12 Ticker symbol	13 Account number(s)

Part II Organizational Action Attach additional statements if needed. See back of form for additional questions.

14 Describe the organizational action and, if applicable, the date of the action or the date against which shareholders' ownership is measured for the action ▶ On September 1, 2021, 1Life Healthcare, Inc.'s ("One Medical") newly formed subsidiary, SB Merger Sub, Inc. ("Merger Sub") merged with and into lora Health, Inc. (the "Company") with the Company surviving the merger. After the merger, the Company became a wholly owned corporate subsidiary of One Medical.

The consideration received by the Company's shareholders consisted of 52,776,528 common shares of One Medical voting stock and \$143.83 of cash (in lieu of receipt of fractional shares of One Medical).

15 Describe the quantitative effect of the organizational action on the basis of the security in the hands of a U.S. taxpayer as an adjustment per share or as a percentage of old basis ▶ The quantitative effect is expressed as the sum of the respective shareholder's basis in the Company stock, minus any cash recieved, plus any gain recognized by such shareholder. The resulting amount is then allocated amongst the number of shares of One Medical stock.

If any shares of Company stock were acquired at different times or at different prices, the above quantitative effect should be applied separately to each block of Company stock exchanged in the merger.

16 Describe the calculation of the change in basis and the data that supports the calculation, such as the market values of securities and the valuation dates ▶ The respective shareholder's basis in One Medical stock received is the same as its basis in the Company stock surrendered decreased by the amount of cash recieved, if any, and increased by the amount of gain recognized, if any, allocated amongst the number of One Medical common shares received in the transaction, including One Medical shares paid as part of the expense fund. The per share value of One Medical stock received as of the closing date was \$23.63 per share.

If any shares of Company stock were acquired at different times or at different prices, the above quantitative effect should be applied separately to each block of Company stock exchanged in the merger.

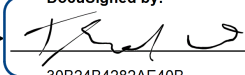
Part II Organizational Action (continued)

17 List the applicable Internal Revenue Code section(s) and subsection(s) upon which the tax treatment is based ▶
Section 368(a)(1)(A), Section 368(a)(2)(E), Section 354, Section 356, and Section 358

18 Can any resulting loss be recognized? ▶ Not applicable under Section 354(a)(1)

19 Provide any other information necessary to implement the adjustment, such as the reportable tax year ▶
The merger was effective on September 1, 2021 and completed by the parties as part of a formal plan of reorganization under Section 368(a) adopted on June 6, 2021.

Under penalties of perjury, I declare that I have examined this return, including accompanying schedules and statements, and to the best of my knowledge and belief, it is true, correct, and complete. Declaration of preparer (other than officer) is based on all information of which preparer has any knowledge.

Sign Here
Signature ▶  Date ▶ 10/15/2021
Print your name ▶ Bjorn Thaler Title ▶ Chief Financial Officer

Paid Preparer Use Only	Print/Type preparer's name	Preparer's signature	Date	Check <input type="checkbox"/> if self-employed	PTIN
	BRANDON NETT		10/15/2021		P00543148
	Firm's name ▶ ANDERSEN TAX LLC	Firm's EIN ▶ 33-1197384		Phone no. (206) 577-7880	
Firm's address ▶ 1200 FIFTH AVE SUITE 1600 SEATTLE, WA 98101					