



**BlueCross BlueShield  
of New Mexico**

# Code of Ethics and Conduct

**ETHICS CONNECTS US**



**DECEMBER 2021**

Living Our Purpose  
and Core Values

## Our Purpose

**To Do Everything  
In Our Power To Stand  
With Our Members  
In Sickness And In Health®**

## Our Mission

To increase access to quality affordable health care across the communities we serve.

## Our Core Values



### **Integrity**

Always do the right thing;



### **Respect**

Everyone deserves it;



### **Commitment**

We keep our promises;



### **Excellence**

We drive extraordinary results; and



### **Caring**

We put our heart into our work.



**Maurice Smith**  
President and  
Chief Executive Officer

## A Message from Maurice Smith

Every day, our employees continue to live our core values of integrity, respect, commitment, excellence and caring. This strong work ethic is exemplified through our daily commitment to providing exceptional service to our members and is a contributing factor to why our brand remains one of the most trusted in the industry and our Company is consistently named as one of the World's Most Ethical Companies®.

Every year, we publish the Code of Ethics and Conduct (Code) — a tool to help us maintain our values and guide us in our interactions with our members, providers and all our key stakeholders. Maintaining our core value of respect is especially important to ensuring that our Company continues to be a great place to work, which has always meant so much to our employees over the years.

We all have a responsibility to uphold the high standards of behavior in the Code of Ethics and Conduct so that we can continue to achieve our shared goals, ensuring our Company's ability to deliver against its promises.

Together, we make a difference in the lives of so many individuals — no matter their station in life. By following the Code and working together, we will build on our legacy to increase access to quality health care, quality service, and healthy communities.

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## An Introduction to the Code

**The foundation of our Company is built on the basic principles of good business behavior.**

# 1.0

## An Introduction to the Code from **Tom Lubben**

We act ethically and honestly in everything we do. Working with integrity is one of our core values, and it's how we want to be known. This Code of Ethics and Conduct is the fundamental tool we use

to help us live our values and succeed with integrity. Consider the Code as your guide for doing what's right. It spells out the standards of behavior we expect from you and the policies and regulations that you are required to uphold. It also helps you navigate how to respond in challenging situations and how to respectfully voice your concerns.

Our ethical culture is shaped by the actions you take every day. If, after reading the Code, you have additional questions or concerns, please consult your Supervisor, me or any member of the Ethics and Compliance team. Together our Code and core values of integrity, respect, commitment, excellence and caring will help us find the right path in any situation.

Thank you for supporting our culture of ethics and compliance.

**Tom Lubben**

Chief Ethics and Compliance Officer



## 1.1 Honor the Code: It Applies to You

The Board of Directors has adopted this Code of Ethics and Conduct (“the Code”), which applies to everyone at our Company and our majority owned (greater than 50%) subsidiaries, including all Directors, employees and contingent workers identified as staff augmentation/independent contractors (“workers”). Compliance with this Code and the Corporate Integrity and **Compliance Program Charter** (Compliance Program) is a condition of employment or contract/service agreement.

## 1.2 Know Your Responsibilities

### Act Ethically

You must conduct Company business in accordance with all applicable laws, regulations, contractual obligations and the Company’s Qualified Health Plan Issuer Agreements (Exchange requirements), and behave ethically and with integrity. When making business decisions, always follow the principles of the Code.

It is important to consult with the Legal Division when interpreting laws and regulations. You may also consult with the Ethics and Compliance Department or Government Programs Compliance for assistance in making determinations about the best way to comply with the Code, or with legal, contractual and regulatory requirements.

## Uphold the Code

Read and abide by our Code of Ethics and Conduct and adhere to all Company policies, procedures and corporate standards. Claims of ignorance, good intentions or poor judgment are no excuse for non-compliance. Violations of any policies, procedures or standards, or failure to report violations may result in disciplinary action, up to and including termination.

### Speak Up

Maintaining ethical standards means we value our work environment enough to speak up when we don’t understand something or have a concern. If you see or suspect that someone is violating the law, our Code, policies, procedures or standards, you have a responsibility to report it to your Supervisor or another **Corporate Resource**. Do not investigate the matter yourself, and, beyond reporting it to your Supervisor or the appropriate Corporate Resource, maintain confidentiality regarding the issue. For more information, see the **Speaking Up section**.

### Do Your Part

Be truthful and cooperate fully with any Company-related investigation or audit. Furnish all related materials and facts concerning suspected violations and ensure that this information is accurate and complete. We take all suspected violations of the Code or Company policies and procedures seriously and investigate each. The Ethics and Compliance Department may enlist other areas of the Company to review the information supplied or conduct their own investigation.

## Certify Your Participation

In accordance with the Compliance Program or other Company policies, procedures and corporate standards, you may be asked to complete a certification form pertaining to training you attend, mandated requirements you fulfill and/or the work you produce or oversee. These certifications, along with other mandatory compliance requirements such as the Conflict of Interest form, must always be completed within the time frame specified. If you have concerns about the certification process or any required supporting documentation, consult with your Supervisor or another **Corporate Resource**.

For information regarding how ethical responsibilities impact employee compensation, see **Annual Performance Review Information**.



## 1.3 Know Your Responsibilities as a Supervisor

### Maintain an Ethical Workplace

If you are a Supervisor, you have a special responsibility to maintain a work environment in which your team knows that ethical and legal behavior is expected.

### Set a Good Example

As a Supervisor, you must make sure that your team understands and applies the ethical standards set out in the Code. You must also set a personal example of high ethical standards in your daily work. Be aware of placing undue pressure on staff that could lead to compromising our Code and core values. See the **Leading with Integrity Handbook for Managers** to learn how to create an open, values based culture where employees are comfortable coming forward with their ethical questions and concerns.

### Listen

To do so, listen to concerns. Make sure that your team feels comfortable voicing their concerns by maintaining an open door policy. Let your team know that you are always available to listen to their concerns and help them make a good faith report.

### Take Immediate Action

If someone does come to you with a concern, you have an obligation to determine if it is an issue that needs to be reported to **Human Resources** or another **Corporate Resource** immediately. For example, behavior that may be unethical or illegal needs to be reported to Human Resources, the Ethics and

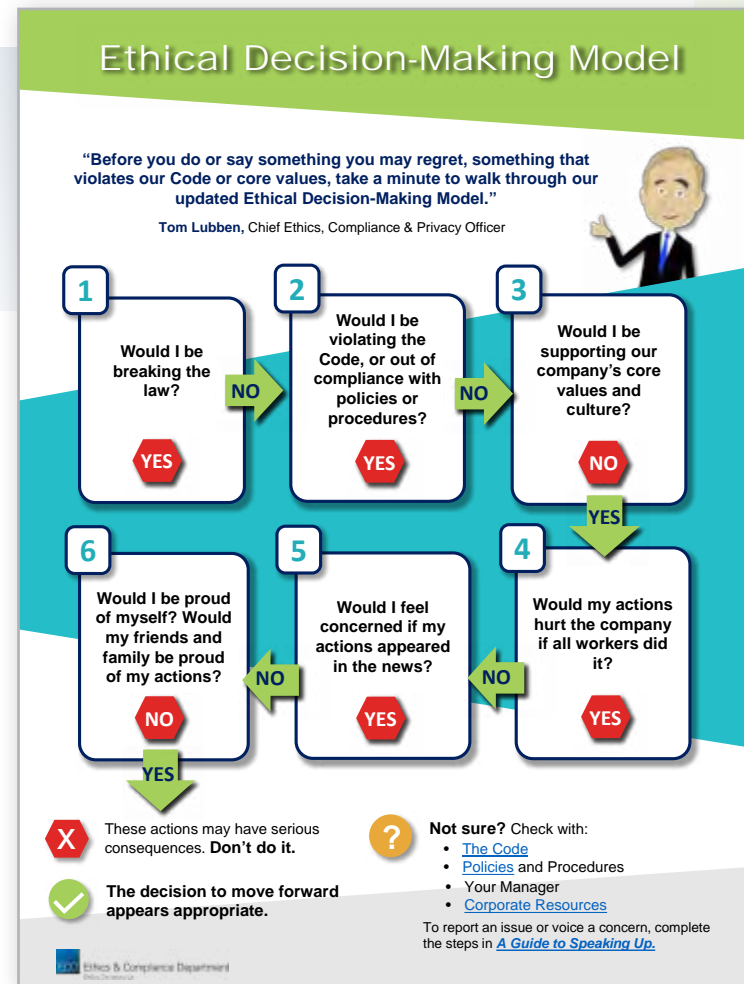
Compliance Department or another Corporate Resource. If that is the case, do not investigate the matter yourself, and, beyond reporting it to the appropriate Corporate Resource, maintain confidentiality regarding the issue. In addition, do not tolerate retaliation against the individual by others. For day to day concerns such as performance, attendance, adherence to dress code, respectful communication, appropriate use of corporate assets and appropriate use of social media, management should first try to address the issue, and then if necessary, escalate continued behavior to Human Resources or other Corporate Resources. For contingent workers, escalate to their Account Manager. If possible, Supervisors should take immediate action to address any inappropriate behavior at the time it occurs. For additional guidance on “escalating concerns”, please see the **Manager's Map to Handling Employee Concerns**. If you are unsure whether to report a concern, please err on the side of reporting it.

For information regarding how ethical responsibilities impact management compensation see **Annual Performance Review Information**.

## 1.4 Make Good Choices

Our business is governed by complex and ever-changing laws, rules and regulations. We recognize that complying with a demanding regulatory environment can sometimes create uncertainty. That is why we want you to have the resources and training you need to make ethical and legal decisions. Use the following ethical decision-making model when you confront difficult choices or ethical dilemmas at work and are unsure how to act.

## Ethical Decision-Making Model



Click on image to download job aid.



## Non-Retaliation

We expect you to raise questions when you have doubts about whether an action or situation may be improper. We also expect you to report any activity which you believe may violate any applicable laws, regulations, policies or the Code. We do not tolerate any retaliation for bringing forward a good faith concern. “Good faith” does not mean being correct about the potential violation. It means reasonable belief that the information you provided is truthful. Retaliation includes but is not limited to:

- Demotion, termination or illegal retraction of benefits;
- Reduction of compensation;
- Poor work performance evaluation;
- Exclusion from corporate events or meetings;
- Defamation of character; or
- Harassment.

Any person who violates our Company’s **Non-Retaliation Policy** will be subject to disciplinary action and could face termination.

**Q. Ever since I reported a concern, my co-worker won’t speak to me — and the report wasn’t even about him. Is this retaliation?**

**A. It might be.** Talk to your Supervisor. Refusing to speak with a co-worker is unacceptable. But your co-worker might not know you were the Reporter, and they might simply be focused on their work. Supervisors need to know when communication is not flowing. Remember, they are there to help.

It’s important that employees aren’t afraid to speak up about any issues or concerns. Speaking up shows we care about our work environment and that we respect our co-workers.

## Use the steps for “Speaking Up” if you have a question or concern:

### 1. Value Your Work Environment

We know speaking up can be hard. Think about what it is you value about your work environment so you are motivated to complete all four steps.

### 2. Consult the Code and Resources for Guidance

What do the Code, Company policies, regulations or the law have to say about this issue?

### 3. Collect Information to Make a Report or Ask a Question

Use the **Guide for Speaking Up** job aid to answer questions that will help put your thoughts in order before going to step four.

### 4. Choose a Reporting Method

You have many reporting options to choose from:

- Discuss the issue with your immediate Supervisor. This is usually the most effective way to address a concern. If you are not comfortable doing this, you may go to any other Supervisor or choose the next resource;
- Discuss the issue with another **Corporate Resource** or the **Chief Ethics and Compliance Officer**. If you are not comfortable doing this, choose the next resource;

- Call our **Corporate Integrity HOTLINE at 1-800-838-2552** or report your concern using one of the other options listed below. Your call can be anonymous; you do not have to give your name. However, identifying yourself is preferred, as this allows the Ethics and Compliance Department to interact directly with you and obtain information to help resolve your concern. For more information, see the section of the Code titled **Corporate Integrity HOTLINE**; or
- Issues may also be reported in writing and emailed to the **Ethics and Compliance Department** or faxed to **(312) 938-5431**. For anonymous web reporting, go to **online** and follow the prompts to file a report or follow up on an existing report.

## 1.5 Voice Your Concerns: Corporate Integrity HOTLINE and Web Reporting Tool

At our Company, you have an obligation to report problems or concerns of ethical or compliance violations. While your Supervisor is usually your first and best resource for questions and concerns, you do have other options available, such as the **Corporate Integrity HOTLINE** or the **web reporting tool**. Both options are available 24 hours a day, 7 days a week.

- The **Corporate Integrity HOTLINE** allows you to seek guidance or report those concerns by calling toll-free, **1-800-838-2552**.
- The **web reporting tool** allows you to report those same concerns in writing by going **online**.

### Q. Will I be informed about whether or not my concern was investigated and what the outcome was?

**A. Yes**, the Company will communicate with you through the **HOTLINE** or **web reporting tool**. You'll be informed when the investigation is complete, but may be provided limited information, so as to protect the rights of everyone involved. Any corrective actions taken may not be shared with you for reasons of confidentiality. All concerns are taken seriously and handled discreetly and professionally. The best way to learn about the status of the investigation is to use the Report Key provided to you at the time you raised your concern. Log in to the **HOTLINE** or **web reporting tool** and use the Report Key to ask a question or receive an update.

All contacts to the **Corporate Integrity HOTLINE** or **web reporting tool** can be made anonymously and without fear of retaliation. We encourage you to provide accurate, complete information that will assist us with an investigation. Use the **Guide for Speaking Up** to help you describe the following:

- The situation, including when and where it occurred;
- How you know about the situation;
- How the situation occurred (e.g., if a procedure was violated or instructions were given, dates and times of occurrence);
- Anyone else who has observed the situation or anyone you have talked to about it;
- Who or what might be affected; and
- Any documents or evidence to support your report.

**Q. I am concerned that I am the only person who witnessed a co-worker's misconduct. If I report it, he will know it was me. I'm afraid to call, but should I anyway?**

**A. Yes.** Our Company has a **policy** that prohibits retaliation against anyone for making a report in good faith and everyone has an obligation to report misconduct. Don't ignore this activity. Speak up.

**HOTLINE calls are not answered by an employee of the Company.** Calls are not traced, and the information is treated in a confidential manner, subject to legal limits. Reported issues will be addressed and action taken will be appropriate to the seriousness of the violation. We handle investigations confidentially and have a policy of non-retaliation against anyone who makes a good faith call. This includes calls from consultants, agency temporary employees, customers, providers, vendors and producers and other entities with whom we do business. Any worker who violates this policy will be subject to disciplinary action up to and including termination of employment or contract/service agreement. For a complete overview of the investigation process, please see **"Tom Talks: Anonymous Reporting."**

The **Corporate Integrity HOTLINE** should not be used as a substitute for talking to your local management team, senior management or other **Corporate Resource**. Use this tool when you believe you have exhausted normal Company channels or feel uncomfortable talking to your Supervisor or another Corporate Resource.

## Key Takeaway

We all have a **responsibility** to do what's right and to speak up when we see or suspect conduct that violates our policies.

Summary of Section Resources:

-  **Guide for Speaking Up**
-  **Ethical Decision-Making Model**
-  **Leading with Integrity Handbook** and **LEAD with Integrity Resource Library for Managers**
-  **Manager's Map for Handling Employee Concerns**
-  **Non-Retaliation Policy**
-  **"Tom Talks: Anonymous Reporting"**
-  **"Tom Talks: Overcoming Barriers"**

# Success Through Integrity

We believe integrity  
is all about doing  
the right thing.

## 2.0

### Success Through Integrity

We believe integrity is all about doing the right thing. Through every transaction and every interaction with others, integrity must remain one of our highest standards. Every day we have a responsibility to demonstrate our commitment to our stakeholders and customers and protect our good name.

#### 2.1 Compliance with the Law

##### Our Standard

You must conduct Company business in accordance with all Applicable Laws, regulations, contractual obligations and Exchange requirements, and behave ethically and with integrity. When making business decisions, always follow the principles of the Code.

##### Your Duties

It's up to you to ensure your own compliance with any laws, regulations and contractual obligations that apply to our Company.

- If you work on a government program, e.g., Medicare Advantage, Medicare Part D, Medicare-Medicaid Alignment Initiative (MMAI) state Medicaid or municipal government

employee benefit programs, or perform work related to the Affordable Care Act, you must understand and follow the terms of any applicable contract and all related policies, procedures, corporate standards, Exchange requirements and government guidance.

- Bring any questions or concerns regarding specific laws, regulations or any legal issue promptly to the attention of the **Legal Division**.
- Never jeopardize your job, your co-workers' jobs or the Company's future by taking part in a potentially illegal or unethical activity.
- When fulfilling our financial, legal and reporting obligations, be accurate and complete in preparing records. (See Standard 5.1 Accuracy of Records.)
- If you are involved with purchasing goods or services, be sure to follow our **Procurement Policies** and **Execution of Instruments Policy**. These policies require that purchases be reviewed and approved by internal stakeholders to ensure compliance with federal and state laws and regulations.

**Q. I have been working with an outside vendor to finalize a contract. Can I sign the contract on behalf of the Company?**

- A.** All draft contracts, including Statements of Work, must be submitted to the Corporate Procurement Department for review and processing in order to ensure they comply with the law, are in our Company's best interests and follow all applicable policies.

**Q. My Supervisor has asked me to do something I believe is illegal. I'm afraid if I don't do what I'm told, I could lose my job. Should I do it?**

- A.** Discuss it with your Supervisor to be certain that you both understand the facts. If your concerns are not resolved, or if you are concerned about raising your concerns with your Supervisor, contact a higher level Supervisor or another Corporate Resource. Breaking the law is never acceptable.

- If you enter into any contract on the Company's behalf, you have a duty to make sure it complies with our **Execution of Instruments Policy**, is consistent with our other policies and is in our Company's best interests.

### Anti-Corruption/Anti-Bribery

You must conduct business with integrity and be committed to transparency in our business practices. Our Company prohibits any form of bribery or corruption by employees, contractors and business partners.

You must comply with all applicable laws and requirements concerning activities outside the U.S. including but not limited to, (i) the Foreign Corrupt Practices Act of 1977, as amended, and, where applicable, legislation enacted by member States and signatories implementing the OECD Convention Combating Bribery of Foreign Officials, the UK Bribery Act of 2010, and the India Prevention of Corruption Act, 1988. Due to the complexity of anti-corruption and bribery laws worldwide, it is important that you be aware of Company policies and ask questions if you have any doubts about the proper course of action.



### Do not:

- Under any circumstances offer anything of value (including money or items of value, including nominal value) to an official of a foreign government, foreign political party, candidate for a foreign government office, or to any third party if you know or have reason to know that all or a portion of the item of value will be offered to such foreign individuals or entities;
- Offer money or any item of value to improperly influence a business decision; or
- Accept or give kickbacks when obtaining or awarding contracts, services, referrals, goods or business. A kickback is an offer to receive, request or pay anything of value, even nominal value, to reward business referrals, including goods or services.

**Q. It is not clear from a contract with an offshore vendor what services they are supposed to be providing and/or the invoices from the offshore vendor contain suspicious charges for services not referenced in the Statement of Work. Should I be suspicious?**

**A. Yes,** these could be warning signs of potential noncompliance with the U.S. Foreign Corrupt Practices Act (FCPA) and should be reported to your Supervisor or another Corporate Resource.

## Key Takeaway

We have an obligation to know, understand and follow the laws, regulations and corporate standards that apply to the work we perform.

Summary of Section Resources:

-  **Accuracy of Records Policy**
-  **Compliance with the Law Policy**
-  **Conflicts of Interest Policy**
-  **Decision Tree: Providing Gifts and Entertainment for Commercial Business**
-  **Decision Tree: Providing Gifts and Entertainment for Government Business**
-  **Execution of Instruments – Supplier Agreements Policy**
-  **Gifts, Awards and Perquisites Policy**
-  **Office of Foreign Asset Control (OFAC) Policy**
-  **Procurement Policy**

## 2.2 Conflicts of Interest

### Our Standard

Although you may not realize it, every day you make business decisions that affect our Company. It is critical that you make each decision objectively and in our Company's best interests — and not your own.

### Your Duties

To protect our interests and our reputation, we depend on you to avoid situations where your personal interests could conflict, or even appear to conflict, with the interests of the Company, also known as conflicts of interest. Remember:

- Never allow personal gain to influence your judgment in making business decisions;
- Be free of actual, apparent or potential conflicts of interest when dealing with people or business entities on behalf of the Company;
- Award business solely on merit and on a competitive basis. Whenever possible, ensure the best value for the Company; and
- You may be asked to complete an attestation form from time to time relating to potential conflicts of interest. We may request additional information about potential conflicts of interest when necessary to respond to a customer or government body.

### Relationships Creating Conflicts of Interest and Nepotism

- Do not conduct Company business with any entity in which you or your family owns at least five percent or controlling interest. A potential conflict of interest may also exist if a family member is in a managerial position. A family member is your:
  - Current spouse or domestic partner;
  - Person with whom a worker is in a civil union;
  - Parent/stepparent;
  - Children (includes biological, adopted, foster or other legally placed children);
  - Siblings (includes biological, step or half);
  - Nieces and nephews;
  - Grandparent;
  - Grandchild;
  - In-laws; or
  - Corresponding family members of any worker's spouse, domestic partner or person with whom the worker is in a civil union.
- Employment of family members is permitted, but may not be the basis for a hiring decision. The Company bases hiring and employment decisions on qualifications and not on family or personal relationships. Employees must avoid direct or indirect responsibility for the hiring or supervision of a family member. Even the appearance of favoritism can have a negative effect on team morale and perception of the Company's fairness to all workers.

- Never use information that comes to you through the course of your work for personal investment or gain. Also do not share this type of information with family members or others.

### Personal Relationships

- If someone close to you, whether a family member or friend, works for a competitor, vendor, provider, customer or producer, be aware of potential security or confidentiality issues and conflicts of interest. Avoid situations that could reasonably create an actual, potential or apparent conflict of interest.

**Q. My spouse works for a company that proposes to supply higher quality, less expensive supplies to our Company than our current vendor. Can we deal with that company?**

**A.** As long as you stay out of the purchasing decision, the Company can reach an independent judgment. Always notify your Supervisor of any close relationships with vendors or business partners.

- Avoid romantic or close personal relationships where one individual supervises the other's performance, salary, schedule or other working conditions.
- If you become involved in a romantic or close personal relationship, such as a romantic relationship where one individual supervises the other, you are required to immediately disclose and review the matter with your Supervisor or other Corporate Resource, to determine if there is a conflict and how to resolve it.

### Competing Against the Company

- Never compete against the Company, either directly or indirectly, in any of the products or lines of business that we currently sell or may be selling or developing.
- Do not use your position with the Company for your own — or anyone else's — gain.

### Outside Employment, Board Positions and Other Activities

- Recognize that a conflict of interest may exist if an outside activity hinders or distracts you from performing your job or influences your judgment.
- Do not engage in any activity that negatively impacts your job performance.
- Generally, do not seek or accept any outside employment with a competitor, provider or entity which does business with our Company. If you have any questions about a particular job or activity, contact your Supervisor.
- Obtain your manager's approval and/or the approval of an appropriate Corporate Resource before accepting an officer or director position with an outside business particularly if the organization has a relationship or might expect financial or other support from our Company.

**Note:** It is not possible to list every type of potential conflict of interest. When in doubt, talk to your Manager, Supervisor or another **Corporate Resource**.

**Q. I am an LPN and would like to work in my local Emergency Room one night a month in order to maintain my certification. Would this be considered a conflict?**

**A.** Consult the Conflict of Interest Addendum and Outside Employment/Activity/Board Position Questionnaire for Healthcare Professionals (see Key Takeaway section). Work through the appropriate approvals first and make sure this is supported by your management. Understand that you can be paid for your work but cannot take part in the billing process and most importantly that the work you are doing does not impact your primary commitment to our Company.

**Q. I have been invited to serve on the board of a non-profit organization. May I accept?**

**A.** You should determine if the organization has any potential business interactions or affiliations with our Company (e.g. as a member or supplier). Discuss the invitation with your manager and seek their approval regarding the invitation. If necessary, contact the Corporate Ethics and Compliance Department for guidance regarding the invitation.

## Key Takeaway

Never use information that comes to you through your job for personal investment or gain. Also, never share this type of information with family members or others.

Summary of Section Resources::



**Addendum to Conflict of Interest Policy for Healthcare Professionals**



**Conflict of Interest Decision Tree**



**Conflicts of Interest Policy**



**Outside Employment/Activity/Board Position Questionnaire**



**Outside Employment/Activity/Board Position Questionnaire for Healthcare Professionals**

## 2.3 Gifts and Gratuities

### Our Standard

In dealing with vendors, service providers and customers, we maintain the highest standards of integrity and objectivity. We may not accept or give gifts or gratuities beyond common business courtesies of nominal value, and we do not offer anything of value to officials of foreign governments.

### Your Duties

Gifts and entertainment are a part of doing business, but if they are lavish or offered too frequently, they can compromise your objectivity and create the appearance of favorable treatment. It's up to you to recognize when a gift or gratuity is excessive and refrain from giving or receiving them.

- Never offer or accept gifts or items of value to or from government, public and regulatory officials and employees unless such gifts or items of value have been approved in advance by the Legal Division and/or the Ethics and Compliance Department. Restrictions exist regarding entertainment of government, public and regulatory officials and employees. Rules relative to government, public and regulatory officials and employees should always be reviewed in advance with the Ethics and Compliance Department or Legal Division. (See Standard 4.2, Gifts to Government, Public and Regulatory Officials and Employees.)
- Do not accept or offer gifts, gratuities or favors except common business courtesies of nominal value (\$50 or less) that are given to or received from one source.

- Remember the value of all gifts received in one year from all business sources must not exceed \$150. Gifts exceeding this policy must be approved by the President, Executive Vice President or your Senior Vice President.
- Do not offer or accept gifts of cash or cash equivalents to or from any current, former or potential vendor, customer, broker or provider. Cash equivalents include checks, honoraria, money orders, stocks and savings bonds. Gift certificates and gift cards are not considered cash equivalents, but they are subject to our limits on business courtesies.
- Entertainment and meals offered or received by workers as part of legitimate business activity are not included in the \$50 gift limit, but they must be within reason and moderation. Never accept or offer gifts, entertainment or meals that conflict with an open Request for Proposal (RFP) or other restriction. Prizes from raffles and drawings as part of a legitimate business activity (such as a conference) may be accepted if:
  - The raffle or drawing is a legitimate giveaway and not an attempt to influence your judgment;
  - The event is open to the public or to all attendees and your name was chosen at random;
  - The prize is not excessive and appropriate to the occasion;
  - The prize is not cash; and
  - You are not under any obligation to the company sponsoring the event.



**Q. I am a supervisor and I would like to recognize my employees' achievements by purchasing each employee a gift card valued between \$5.00 and \$25.00. Is this type of purchase permitted? Is the amount permitted? If so, may I use my Company corporate American Express credit card to pay for the gift cards?**

**A.** Our Company discourages the awarding of any goods or services which would generate imputed income for employees, regardless of value. Using a corporate American Express credit card for this type of purchase is not permitted. However, a supervisor can use their personal funds to purchase this type of gift.

Generally, prizes from raffles and drawings outside of business activities are not considered gifts.

- Notwithstanding the permissibility of certain nominal gifts noted above, workers and vendors engaging in activities that involve foreign countries and governments shall not offer anything of value (including money or items of value, including nominal value) to an official of a foreign government, foreign political party, candidate for foreign government office or to any third party if the worker or vendor knows or has reason to know that all or a portion of the item of value will be offered to such foreign individuals or entities.

- If you suspect payments or items of value are being offered to an official of a foreign government, foreign political party or candidate for a foreign government office, either directly or through a third party, notify your Supervisor or another Corporate Resource.
- Although we do not set a dollar limit on gift-giving among workers, always use good judgment when giving or accepting gifts. Gifts of nominal value are always best, and contributing to a gift must always be voluntary. Never give a gift to another worker to influence or show favoritism.

**Q. A vendor is considering purchasing new equipment. I received an invitation to evaluate it. The vendor is headquartered in another city and offered to pay my travel expenses. Is this OK?**

**A. No.** You must avoid even the appearance that your decision to buy might be improperly influenced. If there is a business need to evaluate this equipment, the Company should pay all your expenses.

- Know that when the Company awards items to employees as recognition for a business achievement or as part of Company-sponsored events, they are not considered gifts, but they are subject to all applicable federal, state and local tax requirements.

**Q. One of my team members will soon be celebrating a wedding, and several co-workers are interested in collecting donations for a gift since we are unable to have an office celebration. Are there any policies on collecting/sending donations to employees?**

**A.** Any gift giving or contributions towards a gift should always be voluntary. Although our Company does not set a dollar limit on gift-giving among workers, good judgment should be used when giving gifts. Gifts of nominal value are always best.

**Q. My team is preparing a response to an open RFP for this great new prospect, and I heard the prospect is having a holiday party. My friend works there and asked me to join him. Can I go — it's not like the prospect is "buying me a meal"?**

**A.** You should not go. An RFP often has rules about not contacting the business during the RFP. Your friend will have to attend without you.

## Key Takeaway

We are prohibited from accepting or giving gifts or gratuities beyond common business courtesies of nominal value.

Summary of Section Resources:



**Conflicts of Interest Policy**



**Decision Tree: Providing Gifts and Entertainment for Commercial Business**



**Decision Tree: Providing Gifts and Entertainment for Government Business**



**Decision Tree: Receiving Gifts**



**Gifts, Awards and Perquisites Policy**

## 2.4 Fraud, Waste and Abuse

### Our Standard

Acting ethically and honestly is expected from all employees and contingent workers. That is why we do not tolerate cheating, stealing, theft, deception or acts of fraud.

Fraud is an intentional misrepresentation of fact through the use of words, conduct or concealing important information, to induce someone or an organization to act in a way that results in the receipt of benefits to which the individual or entity would not otherwise be entitled. Engaging in fraudulent behavior damages our reputation and our bottom line, and it has no place in a company that values integrity.



**Q. I work with Medicare Advantage and recently heard about a salesperson offering someone a \$100 gift card if she signed up for Medicare Advantage today. Should I be suspicious?**

**A. Yes.** Offering monetary rewards to sign up for a government health plan is a violation of law. Report this activity to the Ethics and Compliance or Legal Division immediately.

### Your Duties

Be aware of potential fraud, waste or abuse, and if you suspect fraud, waste or abuse, report it. Fraud can be committed by inserting false information on reports or claims made to another person or an institution and can result in taking unfair advantage of someone or an organization through manipulation, misusing inside information or misrepresenting facts.

**Q. I noticed something unusual while processing claims. A medical provider submitted a large amount of high-cost claims for identical services performed on multiple members. This is probably just an error — nothing to worry about, right?**

**A. Wrong.** If you identify claims with suspicious billing patterns, you should report that to a Corporate Resource and/or the **SID Fraud Hotline (1-800-543-0867)** and/or the **web reporting tool**. Don't ignore red flags like these.

Examples of fraud, waste or abuse include:

- Submission of false information to the government or an insurance carrier to obtain money or a benefit;
- Misrepresentation or falsification of health insurance claims, invoices or expense reports;
- Abuse or misuse of Company equipment, material, property, or credit cards; and
- Dishonest accounting practices.

To help prevent fraud, waste and abuse, we depend on you to:

- Know and abide by terms of contracts to which the Company is a party;
  - Strictly comply with the Company's Code of Ethics and Conduct;
  - Cooperate fully and truthfully with government agencies, auditors or others conducting investigations.
- Also see **Cooperating with the Government Section 4.2**;
- Report improper payment to government officials or third parties; and
  - Comply with the laws that impact our business.

If you see or suspect a potential act of theft or fraud, **report it immediately**. In addition to the normal reporting resources, fraud referrals can also be made to the **Special Investigations Department (SID) Fraud Hotline at 1-800-543-0867** or the **web reporting tool**. SID will promptly investigate the incident and take appropriate action. Remember, we depend on you to help identify fraud. If you receive a request from a government agency, or others conducting an investigation of the Company, immediately contact the Legal Division.

## Key Takeaway

We must all do our part to identify and stop potential fraud, waste and abuse.

Summary of Section Resources:



**Government Programs Fraud, Waste and Abuse Program**



**Guide for Speaking Up**

# Success Through Respect

We believe every worker deserves a positive and productive workplace.

## 3.0

### Success Through Respect

We believe every worker at every level of our organization deserves a positive and productive workplace. Our goal is to maintain an environment where we respect each other as well as our Company and its assets.

#### 3.1 Confidentiality of Information

##### Our Standard

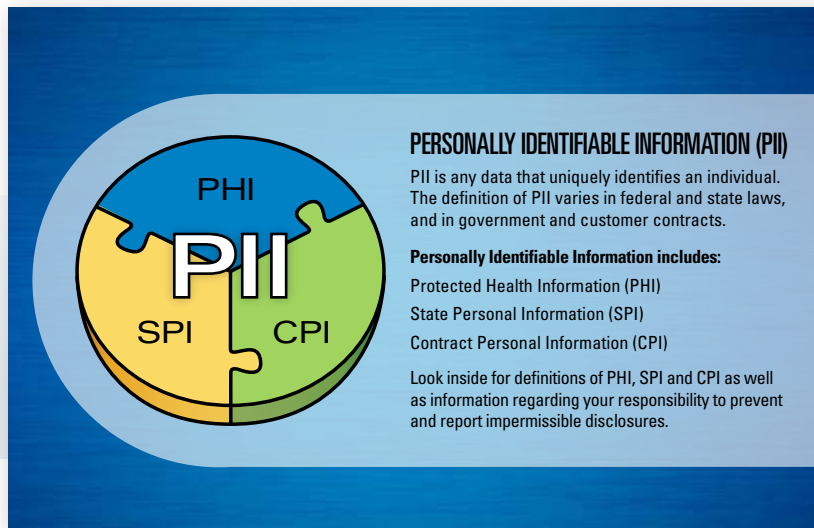
As a company, we maintain significant amounts of business confidential information, which is a valuable competitive asset of the Company and/or personally identifiable information of our members, customers, providers or employees. As one of the World's Most Ethical Companies®, we expect every employee to protect the privacy and security of the information we maintain about our members, customers, business partners and employees.

##### Your Duties

Each of us has a duty to do all that we can to avoid the improper use or disclosure of confidential information in the Company's possession. These duties also include the responsibility to only share the minimum amount of information necessary to fulfill a



legitimate business need. To the extent that you have questions about whether confidential or privileged information may be shared outside of our Company, contact the Legal Division or the Privacy Office.



### Personally Identifiable Information

As stated above, we have a responsibility to protect the Personally Identifiable Information (“PII”) of our members, providers, Company workers, brokers, etc. that we may collect and maintain. PII should only be shared with or accessed by authorized parties both inside and outside of the Company and in compliance with applicable federal and state laws, as well as, corporate and departmental policies and procedures.

**Q. I received a request from a contracted vendor to send some additional PII about our members. Can I just go ahead and send the additional information requested?**

**A. No,** you may not automatically send the data without first determining if it is the “minimum necessary.” For assistance in determining minimum necessary, please contact your Divisional Privacy Officer or the Privacy Office.

**Q. If an employee is terminated or resigns from the Company and their potential employer calls for a reference, can we give them information on job performance, attendance or compensation?**

**A. No.** Regardless of how the employee left the Company, we may not disclose their personal information to the prospective employer. We can only verify that the person worked at the Company and provide dates of employment. Salary information is not released without the employee’s written consent. All such requests should be forwarded to Human Resources for handling.

At the Company, PII includes Protected Health Information (PHI), State Personal Information (SPI) and Contract Personal Information (CPI). Please refer to the **PII card** and the **Information Classification Framework**. Although not an exhaustive list, the following are some reasons we must protect and safeguard PII:

1. The improper use or disclosure of PII can:
  - a. Damage an individual's reputation, cause embarrassment or identity theft, may violate federal and state privacy laws and might expose the Company to lawsuits.
  - b. Damage the Company's reputation and negatively impact our finances.
  - c. Violate a provision within a government or customer contract.
2. Violations of federal or state privacy and security laws could lead to serious penalties for the Company and individual employees.

For more information on our Privacy and Security programs, refer to the **Privacy Office** and **Information Security Sharepoint** sites.

### Business Confidential Information

We must also protect and safeguard the Company's Business Confidential Information (BCI), which includes our Company's Intellectual Property and Trade Secrets, financial information, customer lists, system data, system configuration as well as any confidential information about our company processes and operations. We have a responsibility to avoid any improper use or disclosure of our BCI and other proprietary information to competitors, suppliers, contractors or Company workers that are not authorized to receive such information. Remember, any discussions related to potential business relationships, purchases, mergers or acquisitions or other organizational changes should not be shared with anyone outside the Company, and should only be shared on a "need to know" basis within the Company.

Refer to **Proper Use of Corporate Assets section** for more information on BCI.

An employee or contingent worker should never share PII or BCI on any social media platform (e.g. Facebook, LinkedIn, Twitter, Instagram or similar digital communication channels) unless authorized to do so on behalf of the Company.

**Q. I always struggle with establishing a new password; where can I find more information about our Company's password requirements?**

**A.** Visit the **Information Security** intranet site to review our password management policy and standards.

You should never post information or engage in online conversations that may directly relate to a Company product, service or situation without first obtaining Company approval. (Please refer to Use of Social Media section.)

### Passwords

A key way to protect and maintain the privacy and integrity of our PII and BCI maintained electronically in our systems is to keep your passwords and any security codes used to access our systems confidential. **You are personally responsible to keep passwords and security codes secure and will be held accountable for any misuse of this information.** You must never share your passwords or security codes and you must never allow another person to use your computer while you are logged in. This protection is important because:

- Our information security mechanisms utilize user IDs and passwords to authenticate an individual's identity and establish approved access and rights;

- When multiple individuals have access to the same user IDs and passwords, you can never validate who did what; and
- Our license agreements with system vendors may only allow a certain number of users.

Store all Company documents and files in corporate approved locations, so they may be recovered and accessed by the proper individuals. Whenever an authorized technician works on your computer, you must be present to enter your password and provide oversight. You must **NEVER** give a technician your password. That should be known only by you.

### Customer Information

Although our Company is not publicly traded, many of the companies that we do business with are. During the course of your work, you may become aware of “insider information.” It is against the law to use this information for the Company’s or your own financial gain. Also, do not “tip” others by sharing this information with them.







**Q. A new hire told me that he used to work for a customer of ours. Is it OK for me to ask questions about that company so we can find out how to better market to them?**

**A. No.** He may have an obligation to protect the information of his former employer that continues after he leaves the company.

## Key Takeaway

Only disclose the minimum amount of PII and BCI externally and only to authorized persons or entities, as required by Company policies, procedures and applicable laws.

Summary of Section Resources:

-  **Authentication Controls (IDs and Passwords) Policy**
-  **Authorization Policy**
-  **Confidential Information Policy**
-  **Corporate Privacy Minimum Necessary Policy**
-  **Employment Reference Policy**
-  **Information Technology and Enterprise Data Office Information Classification Policy**
-  **Social Media Use and Requirements Policy**
-  **Social Networking Policy**
-  **Verification of Identity and Authority Policy**

## 3.2 Work Environment

### Our Standard

Our Company is committed to maintaining a work environment that is safe and secure and where everyone is treated with dignity and respect. We believe the diversity of our workers is a great asset, and valuing that diversity creates a more productive and fulfilling workplace. We also value the diverse contributions of all people, regardless of their position, race, color, creed, religion, sex (including pregnancy, childbirth or related medical conditions), age, ethnicity, national origin and identity, mental or physical disability (including HIV and AIDS), veteran status, family status, sexual orientation, gender identity or expression, genetic information or any other basis protected by law. Our employment practices are based solely on ability and performance.

### Your Duties

Work should be a safe space for all. That means we all have the right to work in an environment free from harassment and discrimination, where privacy and dignity are respected and all are protected from offensive, obscene or threatening behavior, whether in person or while online. Being part of a diverse workforce means that others may have an opinion that differs from ours. We don't have to agree with others, but we do have a duty to be respectful and not engage in behavior that violates this policy.

### Harassment, Discrimination and Bullying

We do not tolerate any form of discrimination or harassment by workers, customers, suppliers or others because of a person's race, color, religion, sex (including pregnancy, childbirth or related medical conditions), age, ethnicity, national origin, disability, veteran status, family status, sexual orientation, gender identity or expression, genetic information or any other basis protected by law. We also do not tolerate bullying; by that we mean using your position to unfairly influence, intimidate or harm someone.

**Q. One of my co-workers has a habit of telling questionable ethnic or "off-color" jokes. This offends me and others. How can I get this to stop?**

**A.** Company policy prohibits this type of behavior. You may discuss your feelings with the person telling the joke. If you are uncomfortable doing so, consult with your Supervisor, the Human Resources Department, call the **Corporate Integrity HOTLINE (1-800-838-2552)** or the **web reporting tool**.

Intimidating, hostile or offensive activity, including on digital platforms, affects us all. It lowers morale and interferes with everyone's ability to work. We depend on you to help keep this conduct out of our business. Remember:

- Treat everyone you encounter with dignity and respect. That includes co-workers, customers, suppliers and any other Company stakeholders. Never single out anyone for negative treatment;

**Q. I recently witnessed a co-worker making insulting gender-related remarks to a co-worker. Since it doesn't affect me, should I stay out of it?**

**A. No.** Immediately report the issue to your Supervisor or to another Corporate Resource for appropriate investigation. We do not tolerate harassment, and we expect you to report it if you see it.

- Report any incidents of harassment, discrimination and bullying. They are not tolerated at our Company;
- Recognize this conduct, which includes any actions, language, written materials or objects that are used in a harassing or intimidating way, regardless of the communication method used. All of the following are prohibited: threats; unwanted sexual advances, invitations or comments; visual displays, such as derogatory, racial, or sexually oriented pictures or gestures; and, physical conduct, including assault, unwanted touching or demands to submit to sexual requests as a condition of employment; and
- These standards must be followed in any Company-related setting, including informal business situations, as well as Company-sponsored events and business trips.

## Sexual Harassment

Learn to recognize sexual harassment, which is defined as sexual advances, requests for sexual favors or other verbal or physical conduct of a sexual nature when:

- Submission to such conduct is made a term or condition of an individual's employment;
- Submission to or rejection of such conduct is used as the basis for an employment decision, such as awarding a promotion; or
- Such conduct has the purpose or effect of substantially interfering with an individual's work performance or creating an intimidating, hostile or offensive work environment.

If you believe you have been the subject of sexual harassment, notify your Supervisor or the **Human Resources Department**. You may also call the **Corporate Integrity HOTLINE (1-800-838-2552)** or **web reporting tool**.

## Use of Social Media

Social media allows you to participate in conversations related to things we care about, including our work. Always use good judgment when you are communicating internally through tools, such as Yammer and Jabber or externally through social media sites, including LinkedIn, Facebook, Twitter, Instagram, NextDoor, Pinterest, Reddit, SnapChat, TikTok, WhatsApp, and YouTube. Remember these simple rules of engagement:

- Do use common sense by being professional and appropriate in your communication. Make sure that anything you post or comment on is consistent with our core values;



- Do disclose your relationship with the Company on any endorsements of our products, services or events;
- Social media is a great way to support the Company's efforts in our communities. We encourage you to responsibly use social networks, to post and share pictures and videos of community events, speaking engagements, employee events and open job opportunities;
- Do not post your comments/views as if you are speaking on behalf of the Company, only certain employees are specifically authorized. Consider using a disclaimer like this in your bio/post: "The postings on this site are my own and don't represent my employer's opinions";

- Protect yourself and our Company by being careful in what you share online. Social media is prime ground for attackers to collect information on an individual that can be used to try and target a company;
- Protect your privacy by reviewing the privacy and security settings on the site. Make sure to understand a site's terms of use. Do not use your company's email address to sign up on any site;
- You are personally responsible for the content you publish online, whether in a blog, social media site or any other form of digital media. It is your responsibility to abide by the Company's policies, procedures and corporate standards online and offline, even if your profile or the page/forum in which you are posting is listed as "private" or "closed";
- Be careful not to upload content that might compromise the security of our offices or the privacy of workers or members. Remember that you can inadvertently disclose confidential or proprietary information if a photo includes a computer screen or documents;
- If you make a mistake on social media, correct it as quickly as possible. If you believe the error may have in any way compromised the privacy of our members or revealed proprietary or confidential Company information, report it to your Supervisor to ensure no additional corrections or clarifications will be required; and
- If you see a post by the Company, worker or a Vendor that you believe may violate any of our policies, report it to your Supervisor or another Corporate Resource. Do not use social media as a substitute for a proper Corporate Resource to report a concern.



## Health and Safety

You are responsible for adhering to all Company policies, procedures and corporate standards related to workplace safety and security. While on Company premises, you must wear a Company-issued identification badge or, if applicable, any applicable protective gear at all times.

Our Company is also committed to providing you with a safe and healthy work environment that is free from illegal drugs, violence, threats of violence and the influence of alcohol. We prohibit:

- The unauthorized use or being under the influence of alcoholic beverages in the workplace or while conducting Company business; and
- The use or possession of illegal drugs or other controlled substances in the workplace or being under the influence of such substances while on the job. Prescription drugs are permitted, as long as they are used in accordance with your doctor's prescription, and you can safely and effectively perform your job.

## Key Takeaway

If you observe or experience harassment, you should report it without fear of retaliation.

Summary of Section Resources:

-  **Alcohol Free and Drug Free Workplace Policy**
-  **Anti-Harassment Policy**
-  **COVID-19 Alternative Work Arrangements**
-  **COVID-19 Anti-Harassment Policy**
-  **COVID-19 Safe and Secure Workplace Policy**
-  **Diversity, Equity & Inclusion Policy**
-  **Employment Reference Policy**
-  **Equal Opportunity Employment Policy**
-  **Non-Retaliation Policy**
-  **Safe and Secure Workplace Policy**
-  **Social Media Use and Requirements Policy**
-  **Social Networking Policy**

### 3.3 Proper Use of Corporate Assets

#### Our Standard

Our Company's assets are here to help our business run effectively, and all of us must protect them from loss, damage or misuse. These assets include corporate data, business strategies and plans, financial data, equipment, furniture, vehicles, office supplies, corporate funds, credit cards, work time, computer supplies and software and other proprietary or confidential information about our business or workers.

#### Your Duties

These assets are available for you to do your job, and it's up to you to use them and maintain them with the utmost care and respect. Remember:

- Guard Company assets against misuse, waste, abuse, loss and theft;
- Ensure that assets are only used for valid Company purposes; and
- Protect confidential or proprietary Company information by never sharing it with unauthorized parties such as competitors, suppliers or outside contractors without proper authorization.

#### Q. Can I supply a list of our customers to an outside source?

**A. No.** Customers lists are a valuable asset and should never be disclosed to anyone outside of the Company without specific management approval.

- If you know of someone misusing, damaging or stealing Company property, report it to your Supervisor or another **Corporate Resource**, who will investigate and take appropriate action.

#### Intellectual Property and Trade Secrets/ Business Confidential Information

We also need to make sure we are protecting our intellectual property and trade secrets which may or may not be included in our Business Confidential Information (BCI). These assets include all ideas, inventions, discoveries, improvements and innovations, such as:

- Computer programs, models and databases (including source codes);
- Copyrights;
- Detailed financial or pricing information;
- Logos;
- New product;
- Marketing plans;
- Patents;
- Provider discounts; and
- Trademarks.

The Company owns all intellectual property that you, as an employee or contingent worker, create, develop or write, either on your own or with another person during working hours or not that:

- Relates to — or competes with — actual or anticipated Company business, research or development or other business, strategy or customers of the Company;
- Results from work assigned to or performed by you for the Company; or
- Is created using Company systems, equipment, materials, facilities, computer programs or other resources or ideas, or confidential or proprietary business information.

### Use of the Internet and Other Electronic Media

Remember that our Company's communication systems, e.g., phones, voicemail, fax, email, Internet and Company intranet are provided for your use for business purposes. At no time should such systems and equipment be used to access, store, download or distribute materials that are:

- Unauthorized or personal, such as software or music, except for tablet PCs and smartphones, which feature user-download functionality. Being issued a Company tablet or smartphone is considered authorized use, but ensure that your downloads do not violate Company policy;
- Offensive, threatening or malicious;
- Criminal or promote criminal activity; or
- Sexually explicit.

### Q. Can I download documents, pictures, media clips or software from the Internet for distribution, printing or use on my computer?

A. You may download these items if they are related to a legitimate business need and allowed by the host site. Follow copyright laws before doing so, even if there is a legitimate business need.

Only occasional personal use of the Company's communications systems is allowed, and only if it does not violate the above restrictions and does not interfere with your job performance or the security or effectiveness of any system. If you have questions about appropriate use, speak to your Supervisor about guidelines for your area.

Because the Company owns these communication systems, you should have no expectations of rights to privacy. Management reserves the right to revoke Internet privileges and access, monitor and disclose the contents of any communications, whether business or personal, in accordance with laws. The consequences of visiting an Internet site and viewing, downloading or sending sexually explicit materials is a serious violation of Company policy and will lead to disciplinary action, possibly termination.

For information on use of social media, see the Confidentiality of Information Integrity Standard.

## Unauthorized Software

Protect our Company's computer systems by never loading unauthorized software onto Company-owned PCs, workstations or other computer systems. This could destroy information or systems or cause damage (like incompatible drivers or commands). Software may also be contaminated with viruses or conflict with computer architecture, which could disrupt your computer and others. This also includes applications in the cloud, referred to as Software-as-a-Service. Those applications must be routed through the appropriate approval process.

- Do not make unauthorized copies of computer software programs or use personal software on Company computer equipment.
- Before taking action, contact the appropriate Information Technology personnel, who must approve and possibly install any software.
- Remember, the unauthorized copying or use of unauthorized software could violate federal copyright laws and result in civil and/or criminal liability.

## Respecting the Property Rights of Others

Always respect the property rights of others by never misusing their intellectual property or trade secrets, including the copying or downloading of trademarks, copyrighted materials and logos.

## Key Takeaway

We use and maintain Company assets with the utmost care and respect, guarding against waste, abuse, loss and theft.

Summary of Section Resources:

-  **Confidential Information Policy**
-  **Proper Use of Company Assets Policy**
-  **Social Media Use and Requirements Policy**
-  **Social Networking Policy**
-  **T.04 Internet, Email and Electronic Communications**



# Success Through Commitment

We believe that any  
successful business is  
built on commitments.

## 4.0

### Success Through Commitment

We believe that any successful business is built on commitments, so we honor the commitments we make to our members, workers, the government and the companies with which we do business. We also take responsibility for our actions and focus on fairness and cooperation.

#### 4.1 Antitrust and Fair Competition

##### Our Standard

We are committed to a policy of vigorous, lawful and ethical competition based on the merits of our Company's products and services. By delivering high-quality products and services fairly, ethically and legally, we maintain the trust of our customers and providers.

##### Your Duties

Help us maintain our customers' trust by:

- Ensuring that our sales materials, advertisements and other communications accurately and fairly describe our products and services; and

- Promoting our products and services through fair and accurate comparisons with our competitors

Our Company complies with all applicable antitrust and competition laws. While these laws are complex, they generally prohibit agreements or conduct that may restrain trade or reduce competition. They are intended to provide a variety of products and services at competitive prices. To help us comply:

- Never engage in any activities that involve collusion, price fixing, market sharing or bid-rigging.

**Q. One of our competitors has proposed that we both freeze prices for one of our products for six months to show our mutual commitment to restraining health care costs. She says this is legal because we are limiting the price we will charge consumers. Is it legal?**

**A. No.** It may be illegal. Maximum price-fixing agreements may be just as illegal under the antitrust laws as minimum price-fixing agreements. Avoid any discussion of prices with competitors and consult with the Legal Division any time you receive a similar proposal.

- Avoid all contracts, agreements and understandings which unlawfully reduce or eliminate competition or the production or sale of products or services.
- Refuse any agreements with competitors to establish or fix prices or to divide or allocate markets either by market segment, geography or by any other means. Do not engage in any discussions with employees of competitors about these matters.
- Take special care in ensuring that our discussions and activities with representatives of other companies are in compliance with antitrust laws.

**Q. Do I have to give a specific reason for refusing to do business with a particular producer, vendor or consultant?**

**A. No.** We have broad discretion to decide with whom we do business. If you have any questions about whether a particular practice is anti-competitive, contact the Legal Division.

- Contact the **Legal Division** if you have questions about potential antitrust implications or antitrust practices.

We compete fairly and believe that information about competitors, customers and providers is a valuable asset in a highly competitive market. However, we do not tolerate illegal or unethical means of obtaining this information. Never seek or use information in a way that violates antitrust laws or laws and contracts protecting proprietary data.

### Gathering and Using Competitor Information

Like any other company, our Company believes in remaining competitive. That includes learning as much as we can about the competitive marketplace in which we operate. We believe in gathering this information legally and ethically, and we are committed to avoiding even the appearance of improper activity. You are responsible for understanding the proper methods for gathering competitive information legally and ethically. Remember:

- Do not use confidential information about a competitor that was obtained inappropriately.
- Be sure that you and everyone who is involved with gathering competitive information understand what information is needed and the legal ways to get it.

- If you have questions regarding whether gathering certain competitor information is appropriate, consult the **Legal Division**.
- Only use legal methods to obtain public information.

**Q. A new employee of ours used to work for a vendor that served one of our competitors. He says he has information that would be useful to us, and he can share it since he did not work directly for that competitor. Should I hear what he has to say?**

**A.** You should consult with the Legal Department. If the new employee obtained confidential or proprietary information about our competitor, he could be violating his duty of confidentiality to that company. We may not gather information or use information obtained in violation of a duty of confidentiality.

**Q. I recently received an email from a broker that contained competitor rate and plan information that I never requested. I am not sure how they obtained this information. I'm afraid this may violate our Fair Competition Policy and maybe our Confidentiality Policy. What should I do?**

**A.** Before doing anything with the information, you should first confirm if the information is publicly available. You can confirm this several ways. If it is on the broker's website or on another website like a city or state website, then it would be considered "public information" and having it would not be in violation of our policies. If you cannot confirm whether this is public information, do not use or share the information until you have done your research. If you need guidance, you can reach out to the Legal Division or Ethics & Compliance Department.

## Key Takeaway

As partners in the overall delivery of health care, we are fair and honest in all dealings with health care providers.

Summary of Section Resources:



**Competitive Intelligence Research Collaborative (CIRC)**



**Education resources on antitrust and competitive intelligence in myLearning**



**Fair Competition Policy**

## 4.2 Cooperating with the Government

### Our Standard

We comply with the laws, regulations and Exchange requirements that govern the state and federal programs we administer, e.g., Indian Health Service, Medicare and Medicaid, Medicare-Medicaid Alignment Initiative (MMAI), and state or municipal government employee benefit programs. We must also follow the rules and requirements under the Affordable Care Act. We are respectful when working with government officials, cooperating with reasonable requests for information from government and regulatory agencies.



### Your Duties

When working with government and regulatory officials, remember:

- Always show respect;
- Forward any verbal or written requests for information other than routine inquiries you normally receive in the normal course of business with that particular entity to the **Legal Division**;
- Work with the Legal, Audit and/or Compliance Departments on information requests, and treat any such requests for information from the government as one of your highest priorities;
- Respond to requests for information within the requested timeframe, and ensure that the information you provide is truthful and accurate;
- Never impede, obstruct, improperly influence the conclusions of, or affect the integrity or availability of any government review or investigation;
- If you have any doubt about how to respond, or about the accuracy of the information you are providing, consult your Supervisor before responding; and
- If the government or regulatory agency has a vendor working on their behalf, deal with that vendor as if it were the agency itself.

## Requests for Information from Government Agencies

Providing accurate, complete information is critical when working with government agencies. Remember:

- If you are approached by any person identifying themselves as a government investigator, or receive a subpoena, Civil Investigative Demand or other request for information from a government entity, immediately contact the **Legal Division** before responding or providing any information. A representative will assist you in following proper procedures for cooperating with the investigation;
- Don't feel pressured to talk to a government investigator without first contacting our **Legal Division**. They will consult with any worker who is contacted in connection with a government investigation of the Company. You can advise the investigator that you need to contact the Legal Department for further direction and you may ask for contact information from that investigator. Please advise them that someone from the Company will get back to them as soon as possible;

### **Q. I have been contacted by a member of law enforcement requesting information about our Company. What should I do?**

- A.** Before you provide any information, promptly notify our Legal Division for an evaluation of the request, including whether a subpoena is required for disclosure. Explain to the individual that Company policy requires notification of the Legal Division before any information is provided.

- Ensure that information we provide is not misleading by including all material facts. If you have any doubt about the accuracy, responsiveness or propriety of the information you may be producing, check with your Supervisor. If the Legal Division is engaged on the matter, do not produce any information without their approval;
- Never lie or make false or misleading statements, whether oral or written, to any government official or agency or anyone acting on their behalf, such as a lawyer, vendor or investigator.
- Never attempt to persuade or assist a Company employee or any other person, to provide false or misleading information to a government official or agency;
- Never destroy or alter any Company document or record when anticipating or following a government or court request for the document or record; and
- Honor all holds that are placed on our normal document destruction procedures when a government audit or investigation is imminent or pending. Maintain this hold until you are instructed in writing by the Legal Division that it can be released.



## Gifts to Government, Public and Regulatory Officials and Employees

Generally, federal, state and local laws prohibit government, public and regulatory officials and employees from accepting anything of value. This may include things like buying lunch or dinner for, or hosting an event with, a government employee. Because of these restrictions, always check and abide by all federal, state and local laws, rules and regulations relating to gifts and entertainment of government, public and regulatory officials and employees. Never offer a gift to, or on behalf of, a government, public or regulatory officials or employee unless they have been approved in advance by the Legal Division and/or Compliance Department. Do not under any circumstances offer anything of value (including money or items of value, including nominal value) to an official of a foreign government, foreign political party, candidate for a foreign government office, or to any third party if you know or have reason to know that all or a portion of the item of value will be offered to such foreign individuals or entities. For additional information, please see the **Anti-corruption/Anti-bribery section**. If you have questions as to what those specific legal restrictions may be, contact the Legal Division, Compliance Department, call the **Corporate Integrity HOTLINE (1-800-838-2552)** or use **web reporting tool**.

## Federal Procurement

Our Company is subject to the Federal Procurement Integrity Act when bidding on federal contracts. This law calls for ethical business conduct for companies seeking to obtain work from the Federal Government. There also may be local government and municipalities with similar procurement rules.

During the bidding process, do not:

- Discuss employment or business opportunities with agency procurement officials at the Company;
- Offer or give gratuities or anything of value to any agency procurement official; or
- Seek to obtain any confidential information about the selection criteria before the contract is awarded; this includes information submitted by other companies.

## Key Takeaway

We cooperate with all reasonable requests for information from governmental agencies.

Summary of Section Resources:



**Cooperating with the Government Policy**



**Gifts, Awards and Perquisites Policy**

## 4.3 When the Government is Our Client

### Our Standard

When we act as a government contractor or subcontractor, we have a special obligation to the government, the beneficiaries of government programs, employees of government entities and the public at large to ensure that we perform with the highest degree of integrity. There are also many new laws, regulations and Exchange requirements pertaining to our business under the Affordable Care Act. Part of that obligation is understanding and complying with the additional requirements of government contracts.

### Your Duties

In your role, you may directly or indirectly perform work related to government contracts, e.g., Indian Health Service, Medicare and Medicaid, Medicare-Medicaid Alignment Initiative (MMAI), and state or municipal government employee benefit programs. You may also perform work related to the Affordable Care Act. It is your job to:

- Know the terms of the government contract(s) that we are working on and all of the policies, procedures and corporate standards relating to those contracts. This includes understanding and meeting all deadlines in a timely manner;
- Understand the regulatory requirements for each aspect of the government contract(s) that impact your job;
- Understand that you may be required to sign certifications, either internal or to the government, regarding the accuracy of information or the Company's performance;

- Work with the Legal, Audit and/or Compliance Departments on information requests, and treat any such requests for information from the government as one of your highest priorities. Respond to these requests within the requested timeframe and with information that is complete and accurate; and
- If you have any doubt regarding the Company's performance under a government contract, come forward immediately.

If you need guidance or want to report a concern, you may call the toll-free **Corporate Integrity HOTLINE (1-800-838-2552)**. This service is also available to subcontractors, agents and directors. You may call anonymously, without fear of intimidation or retaliation. Calls are not traced and information is treated confidentially, subject to legal limits. The hotline is available 24 hours a day, 7 days a week and is not staffed by employees of our Company or its subsidiaries.

**Q. I am concerned that a colleague who works with me on a government contract is involved in the submission of false Medicare claims. What should I do?**

**A.** Use the Guide for Speaking Up to document your concerns and bring your concerns to your Supervisor, call the **Corporate Integrity HOTLINE (1-800-838-2552)** or use the **web reporting tool**, where you may report your concerns anonymously and without fear of retaliation.

Doing business with the government is unique, and special statutes and regulations apply, even those that are “flowed down” to us as a contractor or subcontractor. The following is a general summary of what you must do and what you must not do under some of these legal and contractual provisions of our government contracts.

### When Bidding on Government Contracts

#### Do:

- Remember that the rules are designed to promote a fair and competitive bid process;
- Read the RFP and/or bid instructions in their entirety and abide by their terms;
- Submit pricing data that contains all the facts that a buyer and seller would expect to affect price;
- Communicate with the government agency only through approved communication channels;
- Be aware of any “quiet period” limitations imposed in the RFP.
- Enforce a zero tolerance policy regarding the trafficking of persons in the performance of any Company contract with the federal government; and
- Be aware of limitations on gifts, entertainment, meals or political contributions and lobbying while a RFP is pending.

### Do not:

- Offer or give gifts to any procurement official or make promises of future employment to government employees not involved in the bid;
- Obtain non-public bid information such as cost or price data, proprietary information, or information a government entity has not provided to all bidders prior to the award of the contract; or
- Exchange information with a competitor or discuss a bid with a competitor.

See also **Kickbacks**.

### In Performance of Our Government Contracts

#### Do:

- Obtain necessary written approvals before using information for any purpose other than what is allowed under our government contracts. Protect individuals' personal information by limiting its collection and disclosure to only what is legally authorized and necessary;
- Protect the confidentiality of beneficiary records by not disclosing any government assistance that a beneficiary may have received related to the treatment, diagnosis or prognosis of substance abuse;
- Honor appropriate requests from the public for government records that we create and maintain;
- Provide required evaluations and reports regarding our internal accounting and administrative controls including compliance with the law, reasonable assurance and safeguards, etc.; and
- Respond to all inquiries from the government, either directly when inquiries are routine, or through Audit, Legal or Compliance staff, in a manner that is timely, accurate and complete.



### Do not:

- Offer or accept any form of kickback, e.g., money, fee, commission, credit, gift, gratuity or thing of value for improperly obtaining or rewarding favorable treatment, including unwarranted waivers of deadlines and acceptance of non-conforming goods in connection with a prime contract or subcontract;

**Q. I have a friendly working relationship with a government client and would like to give him a \$25 gift certificate to a restaurant that I can't use. Since it's a small amount, and I'm not asking for special treatment, it's OK, isn't it?**

**A. No.** We are prohibited from giving or accepting cash or cash equivalents from a government client, regardless of the dollar amount. This action could suggest that you are seeking favors or special treatment.

- Submit false or fraudulent claims for payment with actual knowledge of falsity, reckless disregard for the truth or deliberate ignorance of the truth or falsity;
- Make any false statements or representations; or
- Hire or do business with individuals or entities that have been suspended, debarred or excluded from participation in federal health care programs.

### In Our Workplace

#### Do:

- Maintain a drug-free workplace by prohibiting the manufacture, distribution, possession or use of narcotics, drugs or controlled substances in the workplace or while conducting Company business;
- Ensure that applicants, employees and contingent workers are treated fairly without regard to their race, color, creed, religion, sex (including pregnancy, childbirth or related medical conditions), age, ethnicity, national origin and identity, mental or physical disability (including HIV and AIDS), veteran status, family status, sexual orientation, gender identity or expression, genetic information or other categories defined by federal, state or local law. Eliminate any impediments to equal employment opportunities;
- Ensure that veterans and disabled veterans are provided equal employment opportunities; and
- Enforce a zero tolerance policy regarding the trafficking of persons in the performance of any Company contract with the federal government.



## Do not:

- Discriminate against individuals in the terms and conditions of employment based on race, color, religion, sex, ethnicity, national origin and identity, age, mental or physical disability (including HIV and AIDS), pregnancy, protected veteran status, marital status, sexual orientation, gender identity and expressions, genetic information or other categories defined by federal, state or local law.
- Discriminate against individuals in the terms and conditions of employment based on disability or perceived disability.
- Offer to hire, hire or do business with current or former government employees unless the transaction has been vetted by the Legal and Compliance Departments.
- Engage in severe forms of trafficking in persons, procure commercial sex acts or use forced labor in the performance of any Company contract with the federal government.
- Failure to comply with these laws, government contracts and Company policies and procedures can:
  - Jeopardize the Company's ability to participate in any government program;
  - Result in the loss of a particular government contract;
  - Require the Company to contact appropriate law enforcement authorities, a government agency or others, which could lead to criminal or civil prosecution of both you and the Company; and
  - Subject you to the full range of disciplinary actions, up to and including termination.

## Key Takeaway

We understand and uphold our special obligations when working for government clients.

Summary of Section Resources:

-  **Alcohol Free and Drug Free Workplace Policy**
-  **Anti-Harassment Policy**
-  **Confidential Information Policy**
-  **Cooperating with the Government Policy**
-  **Decision Tree: Providing Gifts & Entertainment for Government Business**
-  **Diversity, Equity and Inclusion Policy**
-  **Education programs in myLearning**
-  **Equal Opportunity and Employment Policy**
-  **Gifts, Awards and Perquisites Policy**
-  **Guide for Speaking Up**
-  **Non-Retaliation Policy**
-  **Privacy Authorization Policy**

# Success Through Excellence

We believe that  
extraordinary results  
are no accident.

## 5.0

### Success Through Excellence

We believe that extraordinary results are no accident. They are the result of hard work, determination, attention to accuracy and a commitment to quality at every turn.

#### 5.1 Accuracy of Records

##### Our Standard

Our business records are of critical importance to our Company's decision-making processes. We believe in being accurate and complete in preparing these records and in fulfilling our financial, legal and reporting obligations.

##### Your Duties

Accuracy and reliability means never misrepresenting facts or falsifying or suppressing records. Another important responsibility is proper maintenance of records in accordance with the retention periods required by Company policy and our **Enterprise Records Retention Schedule (ERRS)**.

## Recordkeeping and Reporting

To ensure the integrity of our records and reporting:

- Ensure that all Company records, including business expense accounts, vouchers, bills, payrolls, service records, sales reports, timesheets, benefit selections, operating statistics and measurements and other performance and utilization records, whether electronic or on paper, are reliable, timely, accurate and complete;
- Promptly and accurately enter transactions between the Company and outside individuals and organizations in Company records according to our corporate policies and procedures;

**Q. We are closing with a large group account. Our contact says it would “seal the deal” if we delayed the first month’s billing by 30 days, so they can show a large profit in the current month. The billing would be recorded appropriately on our books. Is this allowable?**

**A. No.** While our financial records might be stated correctly, you may never assist a current or potential business partner to misstate their reporting.

- Do not alter or make false entries on, any Company record or document, or facilitate the creation of false or misleading records of any covered groups, vendors or business partner. Such entries are unlawful and could subject the Company and you, to fines and other civil or criminal penalties;

**Q. I am a Customer Advocate Specialist and always follow the dollar limits on the claims I can release. I know this high dollar claim should be paid, but it’s above my limit. If I follow our workflow, it will slow down the Provider getting paid. Can’t I break it down into two smaller amounts and process both of them?**

**A. No.** Breaking down a high dollar claim into smaller claims is a manipulation of our Company's claims processing system and results in inaccurate Explanation of Benefits to our Providers. If you have recommendations about improving your department workflow, bring those to your management, but you cannot change the workflow on your own. Many high dollar claims need management approval and some even require us to notify the customer. Your manipulation of the system, even with the best of intentions, is a violation of our Accuracy of Records policy.



**Q. How will I know if a document that the Company schedules for destruction is relevant to a pending investigation, audit or litigation?**

**A.** When the Company becomes aware of a possible legal proceeding, audit or investigation, the Legal Division circulates a legal hold notice identifying which records are relevant and may not be destroyed. If you receive such a notice, promptly notify your Supervisor. If you have any questions about whether information in your possession is subject to a legal hold, please contact the Legal Division.

- If you are unsure if information is accurate or reliable, or you are being asked to help create false or misleading records for anyone, verify it or contact your Supervisor for advice;

**Q. I am concerned about the accuracy of the reports we are providing to some of our large groups that have performance guarantee requirements. What should I do?**

**A.** Discuss your concerns with your Supervisor to make sure you understand reporting requirements. You may also contact the Legal Division or another Corporate Resource. Misstating results could damage our reputation and relationship with these groups. Many larger groups audit performance guarantee results, so accuracy is critical. False reporting may result in civil and/or criminal liability.

- Charge all items to the appropriate account, regardless of the financial status of the line of business, contract or cost center;
- Never maintain secret or unrecorded funds;
- When errors are found, follow appropriate Company procedures to ensure that they are corrected through credits, refunds or other mutually acceptable means; and

**Q. What should I do if I have completed a financial report, and someone wants to make changes which I believe will result in inaccurate information?**

**A.** Discuss your concerns with your Supervisor to review the reasons for the proposed changes. If you still have concerns, contact the Chief Ethics and Compliance Officer or another Corporate Resource.

- Never take steps to impede, obstruct, improperly influence or affect the integrity or availability of any audit, review or investigation, whether it is performed by government, external or internal personnel.

**Records and Information Management**

You are required to preserve and dispose of Company records in accordance with our records and information management policies and the Enterprise Records Retention Schedule (ERRS). Also, you must comply with Legal or Tax Holds that require preservation of records even if the retention periods than those



in the ERRS have elapsed. It is especially important to be aware of any unique retention requirements for government business, as some are covered by special regulations or contract obligations. If you have any questions about records retention, please contact your department's Records Liaison or the **Records and Information Management Department**.

### Report Certifications

You may be asked to sign a Report Certification, which demonstrates our Company's commitment to the integrity, accuracy and timeliness of its reports and disclosures. These Certifications are vitally important because they:

- Establish a written record to support the accuracy and completeness of reports;
- Document that information submitted has been reviewed and is accurate to the best knowledge of the certifier;
- Encourage disclosure of any issues via the "Exceptions" section of the certification; and
- Provide a vehicle for feedback to management on identified exceptions.

Certifications are submitted by management and staff to Audit Services, which compiles the responses to support the report certification process. If you have questions about the report certification process, contact the **Chief Audit Executive** or another **Corporate Resource**. You can also call the **Corporate Integrity HOTLINE (1-800-838-2552)** or use the **web reporting tool** to anonymously report your concerns regarding financial reporting, internal accounting controls or auditing matters.

## Key Takeaway

We preserve and maintain Company records in accordance with the Company's records and information management policies and the Enterprise Records Retention Schedule.

Summary of Section Resources:



**Accuracy of Records Policy**



**Corporate Records and Information Management Policy**



**Enterprise Records Retention Schedule**



**Corporate Records and Information Management Procedures**



**Legal Hold Policy**

## 5.2 Quality of Service

### Our Standard

Our customers are the reason we are in business. Because of them, we are committed to providing products and services of the highest quality and value.

### Your Duties

In providing our services to both external and internal customers, strive to:

- Provide prompt and accurate services consistent with contractual benefits, corporate policies and regulatory requirements;
- Serve our customers professionally and with integrity, honesty and respect;

- Pay all contractual benefits due Covered Persons and Providers promptly and accurately;
- Comply with all applicable statutes, regulations and instructions that govern the administration of benefit programs;
- Never engage in "Call Avoidance" or "Work Avoidance." These behaviors involve any intentional acts to manipulate our systems (headset, computer, keyboard, computer mouse, phone or other systems) to delay or avoid taking a call from a member, provider or third party. Work Avoidance involves intentionally failing to perform your job duties. This may also include misusing our systems to record time to reflect that you are working, when you may be engaged in non-work activities. These behaviors violate our Code of Ethics and Conduct and will not be tolerated. Corrective action will be taken, up to and including termination; and

**Q. I overheard a co-worker being rude to a customer. When the caller asked for his name, he refused to give it and disconnected the caller. Should I report this to my Supervisor?**

**A. Yes.** Our customers are important to us. We always want to serve them courteously. Your Supervisor will want to contact the customer, apologize and address the concern appropriately. They will also counsel the co-worker to prevent similar situations in the future.

**Q. I work in customer service as an advocate (CA). I have heard that a co-worker answers a call, and then hangs up in an attempt to avoid speaking with a member. I know it is wrong to hang up on a caller, but I understand why they feel pressured to do so. I am torn — what should I do?**

**A.** Purposely hanging up on a caller or engaging in any intentional act to avoid taking a member or provider call violates every one of our core values and leads to misleading reporting. The co-worker could be engaging in "Call Avoidance." Use the **Guide for Speaking Up** to document your concerns and report such behavior and other concerns to your Supervisor or another Corporate Resource.



- Every day, work towards finding new ways to increase the quality of service delivered to our customers while ensuring that it is delivered in a cost-effective manner.

**Q. I know of a telecommuting co-worker who is clocking in each day but not actually processing claims or doing work until later in the day. The co-worker told me that they are running personal errands sometimes while clocked in, but that they "make up the time" by being super efficient later in the day. Isn't the co-worker stealing time from the Company since they are getting paid for time when they are not working?**

**A. Yes,** if true, this employee's behavior would be considered theft of time. This type of behavior also violates other sections of our Code of Ethics and Conduct including Accuracy of Records, Proper Use of Corporate Assets and Fraud, Waste and Abuse. Use the **Guide for Speaking Up** to document your concerns and report such behavior and other concerns to your Supervisor or another Corporate Resource.

## Key Takeaway

We continually seek new ways to increase the quality of service we provide to our customers while delivering it in a cost-effective manner.

Summary of Section Resources:



**Accuracy of Records Policy**



**Compliance with the Law Policy**



# Success Through Caring

We believe that people  
are the very heart  
of our business.

## 6.0

### Success Through Caring

We believe that people are the very heart of our business. Caring about people is what sets our Company apart. We look for ways to demonstrate that care through the service we provide and the way we interact with others.

#### 6.1 Political Activity

##### Our Standard

We believe it is important for our Company and our workers to be engaged in the political process, as permitted by law. While federal laws restrict the use of corporate funds in connection with federal elections, and there are similar laws in some states, our Company can support permissible political activities, including paying the administrative expenses of sponsoring a separated segregated fund, like the Employees' Political Action Committee (PAC), which pools voluntary contributions of PAC-eligible employees to support candidates for federal, state and local office. Therefore, we do not use our name, funds or facilities on behalf of political candidates, political parties or elected office holders at any level, (federal, state or local), except as permitted by law and our **Political Activity Policy**.

## Your Duties

### Political Activity on Personal Time

We encourage you to vote and participate fully in the political process, but it is important for you to understand our policies regarding our Company and political activity. Remember:

- The Company will not reimburse you for personal contributions to political candidates or the PAC, including any expenses related to personal political contributions (e.g., travel or meals);

#### Q. May I occasionally do some personal volunteer work monitoring election practices during various municipal, state and federal elections?

A. Employees may use PTO days to work as a volunteer in the election-related activities mentioned. However, the Company will not reimburse any expenses you incur.

- You may not use Company resources to vote and take part in political activities, except as permitted by Company **Voting Policy** and the political programs sponsored by the Company;
- While we encourage non-corporate political activity, it must be done on personal time and at your own expense;
- Our Company complies with all state and federal laws entitling you to take "time off" for voting; and
- You may speak at a local meeting or event as long as you make it clear that you are speaking for yourself, and not as an official spokesperson for our Company. If you are asked

to represent our Company in a formal capacity, get approval from your EVP/SVP, who will advise you if you need to review your proposed presentation with our Company's Government Relations Department.

### The PAC

If you are PAC-eligible salaried employee (grade 36 and above), you may voluntarily participate in the PAC. All contributions to the PAC are voluntary and not tax-deductible. There is no minimum amount to become a PAC member. You have the right to refuse to contribute without reprisal. Under federal election campaign laws, our Company can pay the costs necessary to establish and operate the PAC that complies with Company policy and with federal and/or state legal requirements.



## Employee Political Engagement

Our Government Relations Department and our management may occasionally distribute memos or sponsor activities to bring political and public policy issues to your attention. These activities may involve public officials or political candidates. They are intended to encourage employee participation in the public policy dialogue, but they do not constitute endorsement of a particular candidate, officeholder or political party. We afford equal opportunity to all rival candidates and political parties.

**Q. I just received an email announcing that a candidate for office will be speaking in our building to employees. Does that violate our Code by using the building for political purposes?**

**A.** Provided all rival candidates or political parties are offered equal access, this does not constitute endorsement of a particular candidate and is not a violation of our Code.

**Q. Our Government Relations Department sent out an email urging employees to contact members of the Legislature to oppose a specific piece of legislation. They say the bill would hurt our Company. Is that a violation of the Code?**

**A. No.** Public policy issues differ from political endorsements. Our ability to operate effectively depends upon fair and equitable legislation and regulation at both the state and federal levels. It is important that our Company and our employees are heard on these issues. However, while the Company may encourage such employee participation, it is always voluntary.

## Key Takeaway

We believe it is important to participate in the political process, and our Company honors all laws regulating corporate involvement in political activities.

Summary of Section Resources:

-  **Cooperating with the Government Policy**
-  **Political Action Committee Policy**
-  **Political Activity Policy**
-  **Voting Policy**



## 6.2 Corporate Contributions, Volunteerism and Fundraising

### Our Standard

Our Company is committed to good corporate citizenship and corporate social responsiveness. We believe in supporting the well-being of the communities we serve through a Corporate Contributions Program.

The objective of this program is to help improve community health, support community initiatives and position the Company and its Divisions as a proactive member of the community through grants and sponsorships. In responding to requests for corporate contributions, we give consideration to alternatives, including in-kind support and employee volunteerism, which helps build our brand and position our Company for growth.

### Q. How do I learn about volunteer opportunities?

A. Please view Corporate Community Involvement on our intranet to learn about all community events and activities within your state and location.



### Your Duties

Many of our employees are involved in their own volunteer activities. They may also become involved with 501(c)(3) non-profit organizations, helping them raise money. Our Company supports all corporate volunteer activity as long as it is aligned with our goals, strategy, mission and relationship building. Engagement with strategic community partner non-profit organizations benefits both parties and demonstrates our strong commitment to the communities in which we do business. When you volunteer, remember:

- To request our Company's support for the organization you are involved with, employees may submit a request through our online application process. A state community affairs team will review the request;

### Q. Can I pay for community events through my cost center?

- A. All contributions need to be coordinated through the appropriate state community affairs department in addition to being documented in our contributions database, CyberGrants.
- Do not engage in fundraising at work. Unless approved by senior leadership, any fundraising must take place during non-working time, in non-working areas only. It must also be coordinated by employee Supervisors; and
  - Our Company financially matches employee volunteer efforts. For every verified volunteer hour employees spend with an approved community partner — or with a 501(c)(3) for corporate volunteer events — our Company contributes \$20 per hour to the designated organization, not to exceed a total annual contribution of \$2,000.

## Key Takeaway

Being good corporate citizens is an important part of our work, and we support our employees' efforts to volunteer in support of their communities.

Summary of Section Resources:



**Corporate Contributions Policy**



**Corporate Volunteerism and Fundraising Policy**



## A Final Word

**Your words and actions matter. Thank you for doing your part to maintain our ethical and compliant work environment.**

## Ethics Connects Us

This Code of Ethics and Conduct reflects our Company's commitment to the highest ethical standards of legal and ethical business conduct. It does not contain all Company policies or include all details regarding any policy. Rather, the Code sets forth the fundamental legal and ethical principles for conducting all aspects of Company business. Detailed policies, procedures and corporate standards for conducting Company business are contained in:

- **The Corporate Integrity and Compliance Program Charter;**
- **The Corporate Policy Manual;**
- **Human Resources (HR) Policies;**
- **The Corporate Privacy Policies and Procedures;**
- **The Corporate Information Security Policies, Procedures and Standards;** and
- Other Company manuals, instructions and directions applicable to particular job functions, all of which are available to the Company's employees and contingent workers.

Nothing contained in the Code of Ethics and Conduct constitutes a contract of employment, and it should not be construed as creating an express or implied contract of employment or continued employment. The Company reserves the right to modify the Code of Ethics and Conduct at any time as it deems appropriate.

## Helpful Resources

The Code clearly states that it's our ethical responsibility to report violations and that failure to do so will result in disciplinary action, up to and including termination — but sometimes actually reporting a problem can be tough. Speaking up isn't always easy.

If you are afraid something bad might happen to you if you report the problem, even though the company has a **Non-Retaliation Policy**, focus on what would happen if you didn't speak up: everything you value about your work environment could begin to disappear, and the problem could get worse for you, your co-workers and the company.

To help you take action, use the **Guide for Speaking Up** and then reach out to your manager or any one of our Corporate Resources located on this list. Corporate Resources are people throughout the company who are willing and able to help you.

Thank you for supporting our Company's ethical culture.



**Tom Lubben**

Chief Ethics and Compliance Officer  
(312) 653-7934

## For a comprehensive list of resources, view our Corporate Resources:

Issues or Concerns	Contact	Contact Information
Do you need to make a report after hours? Do you want to be anonymous?	<b>Corporate Integrity HOTLINE</b>	<b>Call toll-free: 1-800-838-2552</b> <b>24 hours a day, 7 days a week</b> <b>Or go online</b>
Do you have questions about the Code?	<b>Ethics and Compliance Department, Code Investigations</b>	<b>Carrie O'Gara</b> Executive Director, Corporate Compliance (312) 653-7739  For more information, visit the Ethics & Compliance Department website or send an <b>email</b>
Do you have questions about Corporate Policy Management?	<b>Enterprise Policy &amp; Procedure</b>	<b>Peg Griffiths</b> Director Enterprise Policy & Procedure (312) 653-3088 You can also <b>email</b>
Do you need help with Regulatory Compliance? Like ACA Section 1557? Or, state law?	<b>Regulatory Compliance</b>	<b>Chris Breitzman</b> Director Regulatory Compliance (312) 653-1361
Not sure who to go to for what?	<b>Ethics &amp; Compliance Department</b>	<b>Patti Gedminas</b> , Senior Performance Consultant (312) 653-7421
Issues or Concerns	Contact	Contact Information

Do you need to report an issue involving a government contract?	<b>Government Programs Compliance</b>	<p><b>Kim Green</b> VP Government Programs Compliance (312) 653-5110</p> <p>For more information, visit the Government Programs Compliance website or contact:</p> <p><b>Angela Broadway</b>, Sr. Mgr. Govt Compliance, (312) 653-7421.</p>
Have you become aware of suspicious activity or unsafe conditions?	<b>Office of Corporate Protection and Security</b>	<p><b>Shane Colbert</b> Director, Corporate Protection and Security (312) 653-6793</p>
Do you have questions or concerns about the work environment, work relationships, performance management or professional development?	<b>Human Resources</b>	<p><b>Contact AskHR to view additional Workforce Solutions resources or contact:</b></p> <p><b>Kelly Jacks</b> Sr. Director, Workforce Solutions (972) 766-7993</p> <p><b>Manika Turnbull</b> Senior VP &amp; Chief HR Officer (312) 653-4007</p>
Issues or Concerns	Contact	Contact Information

Do you suspect or know about an information security or phishing attempt?	<b>Information Security</b>	<p><b>Contact our Cyber Fusion Center</b> at (972) 996-9866 (toll-free), <b>email</b> (monitored 24/7) or contact a Divisional Security Officer (DSO).</p> <p><b>For phishing attempts</b>, click the "Report Suspicious Email" tab in Outlook or forward the <b>email</b></p> <p><b>Colt Cramer</b> AVP – Information Security, Business &amp; Customer Enablement and Interim Chief Information Security Officer (972) 766-1840</p>
Do you need to address privacy inquiries, incidents and complaints?	<b>Privacy Office (PO)</b>	<p><b>Ryan Lipinski</b> Executive Director, Privacy Office (312) 653-6526</p> <p><b>Andrew Wylie</b> Sr. Privacy Office Administrator (312) 653-4517</p>
Do you have questions about our internal audits or performance guarantees?	<b>Internal Audit</b>	<p><b>For more information, visit the Audit Services website or contact:</b></p> <p><b>Robert Lembach</b> Chief Audit Executive (312) 653-4370</p> <p><b>Scott Nietz</b> DVP Corporate Governance &amp; Performance Services (312) 653-3606</p>
Issues or Concerns	Contact	Contact Information

Do you need to report health care fraud, waste or abuse?	<b>Special Investigations Department (SID)</b>	<p><b>Report anonymously to the SID Fraud Hotline at (800) 543-0867 or by using the online reporting tool.</b></p> <p><b>Bill Monroe</b> Vice President, Special Investigations (312) 653-5348</p> <p><b>Lynn O'Dea</b> Senior Director, Special Investigations – Government Programs (312) 653-3579</p>
Do you need a specific attorney to assist you with a legal matter?	<b>Legal Division</b>	<p><b>For more information, visit the Legal Division site or contact:</b></p> <p><b>Karen Quirk</b> Chief Litigation Officer (312) 653-6540</p> <p><b>Jacie Hachem</b> Senior Director, Office of Corporate Secretary (312) 653-4202</p>
Do you need to note enterprise emerging risks or opportunities?	<b>Enterprise Risk Management</b>	<p><b>William Cochran</b> Risk Management Consultant (312) 653-3586</p> <p><b>Richard Ellis</b> Executive Director (312) 653-6848</p>
Issues or Concerns	Contact	Contact Information

Do you have a question, issue or concern regarding our subsidiary companies?

#### Subsidiary Contacts

**Dearborn Group (HR)**  
**Syeda Soofia**  
Sr. Director, Human Resources  
(630) 458-2254

**Dearborn National (HR Issues)**  
**Becky Clover**  
Associate HR Generalist  
(630) 519-0710

**Dearborn Group (Regulatory and Compliance Issues)**  
**Kathy Larkin**  
Sr. Manager Regulatory Oversight & Compliance  
(248) 327-5276

**Dearborn Group (Regulatory and Compliance Issues)**  
**Teta Gangemi**  
Senior Regulatory Specialist  
(248) 327-5155

**Innovista**  
**Terese Feeney**  
Chief Administrative Officer  
(312) 809-5011

**Medecision**  
**Kenneth Young**  
President & Chief Executive Officer  
(215) 500-6801

If you have any questions concerning any part of the Code, contact your Supervisor, a higher level Supervisor, any of the **Corporate Resources**, call the **Corporate Integrity HOTLINE at 1-800-838-2552** or use the **web report tool**.