

# CODE OF ETHICS AND CONDUCT

Ethics Connects Us

**JANUARY**  
**2025**

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

Our core values are basic principles that shape our company culture and guide good decision making. These values serve as the foundation for how we should work together and make more possible for our members and communities.



### 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.

## World's Most Ethical Companies™



Being designated as one of the World's Most Ethical Companies is one of the highest levels of external validation a company can receive on its journey to develop best-in-class business integrity practices. It sends a clear message to everyone — from internal stakeholders and partners to customers and the public — that every worker is dedicated to building a strong ethical and compliant culture grounded in integrity. Your support for the behaviors outlined in this Code and the standards that apply to all of us, will help us maintain our status as one of the World's Most Ethical Companies.





## Maurice Smith

President, Chief Executive Officer,  
and Vice Chair



## A MESSAGE

from **Maurice Smith**

Our Company has thrived for nearly a century, due in large part to the trust we have established with our members, customers, providers, and employees. To continue to earn this trust, we are committed to maintaining a company culture that promotes the highest standards of ethics and compliance.

Our Company's Code of Ethics and Conduct provides a framework for maintaining our strong culture. The laws, regulations, policies, and procedures outlined in the Code apply to everyone at our Company. Together, they help each of us perform our jobs and responsibly meet the needs of our members and other stakeholders. The Code is the backbone of how we work together consistent with our core values of integrity, respect, commitment, excellence, and caring.

Thank you for standing up for our values and incorporating them in everything you do. Together, we make more possible.

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# 1.0

## An Introduction to the **CODE** from **Jill Wolowitz**

**Jill Wolowitz**  
Executive VP, Chief  
Administrative Officer &  
Chief Ethics, Compliance  
and Privacy Officer



At our Company, our members, employees, and the communities we serve count on all of us to operate ethically and with integrity. With this responsibility, we all must champion a culture of ethics and compliance at work each day.

The Code of Ethics and Conduct is our guide for doing what's right and making good decisions. It explains the standards of behavior, policies, and regulations we're all required to uphold. It also helps us in navigating our response to challenging situations and in respectfully voicing concerns.

Our strong ethical culture is shaped by everyone's actions and behaviors. When we consistently do the right thing, we help create an ethical work environment that enables us to work better together. We all contribute to the legacy and reputation of our Company, and together, we make more possible.

I encourage each of you to read the Code and use it as a guide for your daily work. The Code and our core values of integrity, respect, commitment, excellence, and caring help us succeed in empowering whole person health with compassion and innovation.

Thank you for working together to make our Company an ethical workplace.

## 1.1 Honor the Code: It Applies to You

At our Company, every worker must follow this Code of Ethics and Conduct (“Code”) and the [Compliance Program Charter \(“Compliance Program”\)](#) every day — regardless of role or seniority. Adherence to the Code and Compliance Program is a condition of employment or contract/service agreement.

This applies to everyone at our Company and our majority-owned (greater than 50%) subsidiaries, including all officers, employees and contingent workers identified as staff augmentation/independent contractors (“workers”) and our Company’s Board of Directors. Majority-owned subsidiaries adopt the Compliance Program, follow our Company’s Corporate-level policies, and may adopt additional policies.

## 1.2 Know Your Responsibilities

As a long-time recipient as one of the World’s Most Ethical Companies designation, we’re known for our high ethical standards. However, it takes every one of us working together to create an environment and Company we can be proud of — one that reflects our core values and demonstrates our commitment to legal and ethical responsibilities.

## What We Do:

### Act Ethically and with Integrity

- Make business decisions responsibly and in accordance with our principles of the Code and core values.
- 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 and adhere to all applicable Company policies, procedures, and corporate standards, applicable Laws, regulations, contractual obligations, and the Company’s Qualified Health Plan Issuer Agreements (“Exchange requirements”).

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

- We speak up when we don’t understand something, have a concern, or suspect that someone is violating the law, our Code, policies, procedures, or standards. Do not investigate the matter yourself; instead report it to your management or the appropriate [Corporate Resource](#), and then maintain confidentiality regarding the issue. For more information see section [1.5 Speaking Up](#).

## 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.

## Complete Requirements and Certify Your Participation

- Mandatory compliance requirements must always be completed within the time frame specified. These include:
  - Required training, Conflict of Interest form
  - Certification forms pertaining to training you attend, and
  - Mandated requirements you fulfill and/or the work you produce or oversee.

**Impact to Compensation:** For information on how failing to meet these responsibilities may impact your compensation, see [Annual Performance Review Information](#).

## 1.3 Know Your Responsibilities as Leaders

While we must all follow this Code and exemplify our core values, those with leadership or supervisory responsibilities have additional obligations to make sure each team member understands and applies the standards in this Code.

**Tone at the Top:** When it comes to compliance, workers are more likely to follow the rules when they see leadership doing the same. Nothing speaks louder than our actions.

### What We Do:

- Model high ethical standards and legal behavior in daily work and maintain a work environment where this is expected from every team member.
- Understand the rules and requirements that apply to our business areas.
- Set clear expectations and communicate regularly about ethics and compliance.
- Manage your team to ensure they meet applicable requirements and achieve them in the right way.
- Create a safe work environment where workers are comfortable coming forward with ideas, questions, and concerns and that retaliation will not be tolerated.
- Actively listen and be available to support your team by maintaining an open-door policy.
- Immediately address inappropriate behavior and misconduct at the time it occurs or is brought to your attention.

- Be aware of placing undue pressure on staff that could lead to compromising our Code and core values.
- Complete required certifications, forms, and training within the specified time.
- Monitor assignment completions of all direct reports.
  - Not completing requirements on time puts the Company at risk for audit findings and potential penalties.

## Handling Employee Concerns

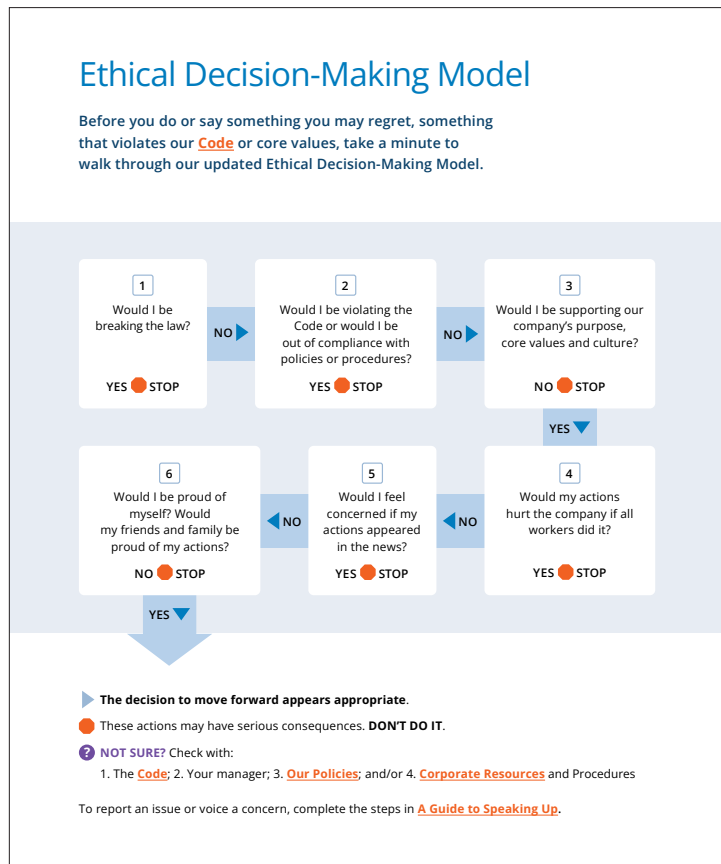
If someone comes to you with a concern, you have a responsibility to listen and act. Handling concerns quickly and appropriately is key to maintaining trust and protecting the Company.

- 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](#).
- For day-to-day concerns such as performance, attendance, dress code, respectful communication, appropriate use of corporate assets or social media, management should first try to address the issue directly by speaking with the employee and clarifying expectations.
- If necessary, escalate continued behavior concerns to Human Resources or other [Corporate Resources](#). For contingent workers, escalate to their Account Manager.

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 impacts compensation see [Annual Performance Review Information](#).

## 1.4 Make Good Choices



The way we act and the choices we make say a lot about who we are as individuals and as an organization.

While not every situation or circumstance can be covered in the Code at our Company, we make decisions, thoughtfully and with integrity. We are proud of what we do and trusted for working in an ethical and legally responsible way.

While the right thing to do might often be obvious, our business is complex. It's governed by ever-changing laws, rules, and demanding regulations that we all must understand and follow. This can create a sense of urgency, pressure to act quickly or even uncertainty.

When this happens, lean on the Code and our core values to move forward. If you get stuck or need more support, consider walking through this ethical decision-making model.

**Remember,** ignorance, good intentions, or poor judgment are no excuse for non-compliance. Violations may result in disciplinary action, up to and including termination.

## 1.5 Speak Up

Speaking up shows we care about each other and that we want to do our jobs in the right way. By sharing our ideas, we can improve, innovate, and become more effective. Voicing concerns and sharing when something isn't right helps reduce risk and resolve issues so that we can create a work environment where we all feel valued.

### Our Company, we speak up to:

- Ask probing questions;
- Have honest conversations;
- Quickly gain clarity;
- Avoid potential problems;
- Voice concerns; and
- Report misconduct or violations

We recognize that speaking up isn't easy, but it's how we get the support we need. That's why every worker is responsible for speaking up. Failing to report violations or misconduct can result in disciplinary action, up to and including termination.

## Our Voice Matters

We all have ideas, feedback and concerns that are worthy of being listened to, respected, and considered. When we speak up, we are heard and supported by the [Non-Retaliation Policy](#).

## How to Speak Up

Answer the questions in the [Guide for Speaking Up](#) to help you provide accurate and complete information that will assist in an investigation.

While your manager is usually the first and best resource for questions and concerns, you do have other options available, such as the [Web Reporting Tool](#) or **Corporate Integrity HOTLINE (1-800-838-2552)**.

The [Web Reporting Tool](#) allows you to report those same concerns in writing by going [here](#). Simply follow the prompts to file a report or follow up on an existing report.

The **Corporate Integrity HOTLINE** allows you to seek guidance or report those concerns by calling toll-free, **1-800-838-2552**.

## About the Reporting Options



### Web Reporting Tool

AND



### Corporate Integrity HOTLINE (1-800-838-2552)

- Both options are available **24 hours a day, seven days a week**, including corporate holidays.
- All contacts can be made **anonymously** and **without fear of retaliation**.
- Anonymous reporters **can respond** to follow-up questions from the investigators or seek status of their case **without compromising their identity**.
- All information is treated in a **confidential manner**, subject to legal limits.
- Calls and online reports **are not traced or answered by an employee** of the Company.

The [Web Reporting Tool](#) and **Corporate Integrity HOTLINE (1-800-838-2552)** should not be used as a substitute for talking to your local management team, senior management or other [Corporate Resource](#). Use these tools when you believe you have exhausted normal Company channels or feel uncomfortable talking to your manager or another Corporate Resource.

## Anonymity and Confidentiality

While we encourage workers to identify themselves, they can choose to remain anonymous. Our Company will make reasonable efforts to protect the identity of those involved, to the extent allowable by law.

## What Happens When You Report



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## No Tolerance for Retaliation

Our Company is committed to maintaining a work environment where workers can feel safe engaging in honest conversations and raising questions or concerns in “good faith” without fear of retaliation.

**What is good faith?** It means you have a reasonable belief that the information you provided is truthful and you have the right to be protected as a “whistleblower” under applicable law. “Good faith” does not mean being correct about the potential violation.

### WHAT IS RETALIATION?

An act of retaliation is taking a negative employment action against someone because they reported an issue or participated in an investigation of an issue (see below). Violation of the [Non-Retaliation Policy](#) will result in disciplinary action, up to and including termination of employment.

Whether you reported something or participated in an investigation, you should never experience retaliation. If you feel like you or others are experiencing retaliation, don't hesitate to let us know.

### Retaliation may include, 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.

## Q&A

**Q** Will I be informed about whether my concern was investigated and what the outcome was?

**A** **Yes**, the Company will communicate with you through the **Corporate Integrity HOTLINE (1-800-838-2552)**, [Web Reporting Tool](#) or directly if you have self-identified. You'll be informed when the investigation is complete; however, 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 **Corporate Integrity HOTLINE (1-800-838-2552)** or [Web Reporting Tool](#), use the Report Key to ask a question or receive an update.

**Q** I am going to be out of town when the ethics and compliance training is due. Can I get an exception if I complete it after the due date?

**A** **No**. Timely completion of training is a requirement of the Compliance Program. Workers have several months to complete training, so unless a worker is on extended leave of absence, training exceptions are not given. Missed deadlines of any kind, whether one day, one week or one month, creates risk that stays with the company for several years, even after a training is completed. Auditors ask for records, and any missed deadline can result in a finding (that could indicate to an Auditor that we do not take compliance seriously).

## QUESTIONS?

Contact your manager, a higher-level manager or a [Corporate Resource](#).

### Resources

- [A 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](#)

# 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**

We know, understand, and follow the laws, regulations, contractual obligations, Exchange requirements and corporate standards that apply to the work we perform. When making business decisions, always follow the principles of the Code.

#### **Why It's Important**

Being accountable for our actions is part of working with integrity and doing business. Failing to adhere to the principles of our Code and obligations could have serious consequences to the Company and to you individually. These include fines, reputational damage, or disciplinary action, up to and including termination.

## What We Do:

- Understand and follow the terms of any applicable contract and all related policies, procedures, corporate standards, Exchange requirements and government guidance (e.g., Medicare Advantage, Medicare Part D, Medicare-Medicaid Alignment Initiative (MMAI), state Medicaid or municipal government employee benefit programs or Affordable Care Act).
- Avoid participating in potentially illegal or unethical activity. It could jeopardize your job, your co-worker's job, or the Company's future.
- Be accurate, complete and timely in preparing records (See Standard 5.1 Accuracy of Records) when fulfilling our financial, legal, and reporting obligations.
- Follow our [Procurement Policies](#) and [Signing Authority-Supplier Agreements Policy](#), if involved with purchasing goods or services, or entering into a contract on the Company's behalf.
- Ask questions, seek guidance, and raise concerns regarding specific laws, regulations, or any legal issue promptly.

## Anti-Bribery/ Anti-Corruption (ABAC)

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.

Due to the complexity of anti-bribery and anti-corruption laws worldwide, it is important that you be aware of Company policies and ask questions to the [Legal Division](#) or Ethics & Compliance Department if you have any doubts about the proper course of action.

## Foreign Corrupt Practices Act (FCPA)

Our Company does not currently conduct business operations internationally but may choose to do so in the future. However, we may engage with vendors or suppliers who operate in foreign countries. Therefore, understanding the key provisions of the FCPA and consequences for violation are essential when making business decisions that involve foreign entities.

### What is the FCPA?

The FCPA is the United States' anti-corruption regulation. The FCPA prohibits bribes to foreign officials for the purpose of obtaining or retaining business or otherwise gaining a commercial benefit. It also forbids concealing the fact that bribes have been paid. Payments do not have to be monetary to be considered improper. Any transfer of "something of value" to a foreign official can be considered an illegal bribe.

Note: Foreign government officials may include officeholders, employees of state owned/operated enterprises (e.g., doctors, technicians, employees at a public hospital), military officials, royal family members, or representatives of international organizations (e.g., United Nations or World Bank).

## What We Don't Do:

- 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.

**What is a kickback?** An offer to receive, request or pay anything of value, even nominal value, to reward business referrals, including goods or services.

## Antitrust and Fair Competition

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 stay competitive and maintain the trust of our customers and providers.

This requires us to learn as much as we can about the competitive marketplace in which we operate. We believe in gathering this information properly, avoiding even the appearance of breaking the rules. You are responsible for complying with applicable antitrust and competition laws and understanding the proper methods for gathering competitive information.

**What are antitrust and fair competition laws?** These laws are intended to protect consumers and businesses by providing a variety of products and services at competitive prices. While they are complex, they generally prohibit agreements or conduct that may restrain trade or reduce competition.

## What We Do:

- Comply with applicable antitrust and competition laws.
- Ensure that our sales materials, advertisements, and other communications accurately and fairly describe our products and services.
- Promote our products and services through fair and accurate comparisons with our competitors.
- 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.

## What We **Don't Do**:

- Engage in any activities that involve collusion, price fixing, market sharing or bid-rigging.
- Tolerate illegal or unethical means of obtaining information about competitors, customers, or providers.
- Seek or use information in a way that violates antitrust laws or laws and contracts protecting proprietary data.

## Q&A

**Q** My manager is pressuring me to do something that I feel is against our Code and core values. I am worried if I don't do it, I could lose my job. What should I do?

**A** First, discuss the ask with your manager 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 manager, contact a higher-level manager or another Corporate Resource such as the [Web Reporting Tool](#) or **Corporate Integrity HOTLINE (1-800-838-2552)**. Feeling pressure to compromise our Code or core values is never acceptable.

**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.

**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 Division](#). 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.

## QUESTIONS?

Contact the [Legal Division](#) for questions about potential antitrust implications and practices or to find out if certain competitor information is appropriate.

### Resources

- [Accuracy of Records Policy](#)
- [Compliance with the Law Policy](#)
- [Competitive Intelligence Research Collaborative](#)
- [Conflicts of Interest Policy](#)
- [Decision Tree: Providing Gifts and Entertainment for Commercial Business](#)
- [Decision Tree: Providing Gifts and Entertainment for Government Business](#)
- [Educational resources on antitrust and competitive intelligence in myLearning](#)
- [Signing Authority - Supplier Agreements Policy](#)
- [Fair Competition Policy](#)
- [Procurement Policy](#)

## 2.2 Fraud, Waste and Abuse

### Our Standard

We do not tolerate cheating, stealing, theft, deception or acts of fraud by providers, members, vendors or workers.

### Why It's Important

New health care fraud schemes emerge daily as fraudsters find new ways to obtain personal or medical information and use it for illegal financial gain. These schemes damage our Company's reputation and bottom line. They can cause higher insurance premiums, expose members to unnecessary medical procedures and put our workers and members in harm's way.

To prevent health care fraud schemes, we must stay vigilant. We all have a responsibility to prevent, detect and report suspected or identified fraud, waste, and abuse.

### What is fraud?

Fraud is an intentional misrepresentation of material fact using words, conduct or concealment, 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.

## What We Do:

### Prevent:

- Know and abide by terms of contracts to which the Company is a party.
- Strictly comply with the Code and the laws that impact our business.
- Cooperate fully and truthfully with government agencies, auditors or others conducting investigations. Also see section [4.2 Cooperating with the Government](#).
- Report improper payment to government officials or third parties.

### Detect:

- Always be aware of potential fraud, waste and abuse schemes. Examples include:
  - Intentional 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
  - Engaging in dishonest accounting practices.

### Report:

- Immediately report potential or suspected acts of theft or fraud.

## Fraud Reporting Options



Call the **Special Investigations Department (SID) Fraud Hotline** at **1-800-543-0867**

OR



Make an online [report](#)

## Q&A

- 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.
- 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**) or [make an online report](#). Don't ignore red flags like these.

## QUESTIONS?

Contact your manager or a [Corporate Resource](#).

### Resources:

- [Compliance with the Law Policy](#)
- [Government Programs Fraud, Waste and Abuse Program](#)
- [A Guide to Speaking Up](#)

## 2.3 Conflicts of Interest

### Our Standard

We are transparent about our relationships to ensure that business decisions are made in the Company's best interests and not our own. Personal relationships, professional opportunities, volunteer activities, financial investments, or other situations may create an actual, apparent, or potential conflict.

Every day, we make business decisions and build relationships that affect our Company. To protect ourselves and the Company's reputation, it's critical that we make each decision objectively.

### What We Do:

- Avoid situations when your or anyone else's personal gain influences or compromises your judgment and ability to make objective 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.
- Avoid Company business with any entity in which you or your family controls or owns an interest of five percent or more.
- Avoid engaging in favoritism or nepotism.

**Favoritism** is demonstrating partiality to someone due to a personal relationship. **Nepotism** is a form of favoritism involving a family member.

- Avoid situations where close personal relationships (e.g., dating or physical) could reasonably create an actual, potential, or apparent conflict of interest.
- Avoid situations with direct or indirect responsibility for the hiring or supervision of a family member.
- Disclose or ask for approval before seeking any outside employment, activity or board position with a competitor, provider or entity which does business with our Company.
  - Complete the [Outside Employment/Activity/Board Position Questionnaire](#) to help document and determine whether or not the outside employment or activity is a conflict of interest.

Note: It is not possible to list every type of potential conflict of interest. If you have questions about relationships that can create a conflict of interest or want to know if an activity or outside employment opportunity is acceptable, view the [Conflict of Interest policy](#) and talk to your manager, a higher-level manager or another [Corporate Resource](#).

You may be asked to complete an attestation form from time to time relating to potential conflicts of interest. Our Company may request additional information about potential conflicts of interest and these attestations may be shared with external entities when necessary and appropriate to respond to a customer or government body.

## Q&A

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

**A** For any second job you are considering, speak to your manager first. If you both agree this may not be a conflict, complete the [Outside Employment/Activity/Board Position Questionnaire](#) and seek the necessary approvals before moving forward. Remember, any job you are considering must 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 competitor, provider, or supplier). Discuss the invitation with your manager first, then complete the [Outside Employment/Activity/Board Position Questionnaire](#) before accepting the invitation. If necessary, contact our Company's [Ethics and Compliance Department](#) for guidance regarding the invitation.

## QUESTIONS?

Contact your manager or another [Corporate Resource](#).

### Resources:

- [Conflict of Interest Decision Tree](#)
- [Conflict of Interest Policy](#)
- [Gifts Policy](#)
- [Outside Employment/Activity/Board Position Questionnaire](#)

## 2.4 Gifts and Entertainment

### Our Standard

We exchange gifts and entertainment to show our appreciation and to develop better working relationships. This is done responsibly and with the highest standards of integrity and objectivity.

### Why It's Important

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.

You are personally responsible for recognizing when a gift or entertainment is excessive and refraining from giving or receiving them.

### What We Do:

- Ensure all gifts and entertainment are appropriate and have a justifiable business purpose.
- Pay attention to the dollar amount and the role of those involved.
  - Ensure the value of all gifts received in one year from all business sources doesn't exceed \$250. Gifts exceeding this policy require prior approval by the President, Executive Vice President, or your Senior Vice President.
  - Note: Entertainment and meals offered or received by workers as part of legitimate business activity are not included in the \$100 gift limit, but they must be within reason and moderation.

## What We Don't Do:

- Offer or accept gifts to and from government, public or regulatory officials unless such gifts or items of value have been approved in advance by the [Legal Division](#) and/or the [Ethics and Compliance Department](#).
  - **Note:** Restrictions exist regarding entertainment of government, public and regulatory officials and employees. (See Standard 4.2 Gifts to Government, Public and Regulatory Officials and Employees)
- Offer or accept gifts except common business courtesies of nominal value (\$100 or less) that are given to or received from one source.
- 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.

## Q&A

- Q** My team is preparing a response to an open Request for Proposal (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 process. Your friend will have to attend without you.
- Q** A vendor invited me to a conference they are hosting and have offered to pay my expenses. Is this OK?
- A** **No.** You must avoid even the appearance of being improperly influenced by the vendor. If there is a business need to attend the conference, the Company should pay all your expenses.
- Q** I am a supervisor, and I would like to recognize my employees' achievements by purchasing each employee a gift card valued between \$5 and \$25. Is this type of purchase permitted? Is the amount permitted? If so, may I use my our Company corporate American Express credit card to pay for the gift cards?
- A** While our Company does not set a dollar limit on gifts among workers, gifts of nominal value are best. Using a corporate American Express credit card for this type of purchase is not permitted by our Company and all gifts are non-reimbursable.

## QUESTIONS?

Contact your manager, the [Legal Division](#) or the [Ethics and Compliance Department](#).

### Resources:

- [Conflict 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 Policy](#)

# 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 always strive to protect its assets.

### 3.1 **Confidentiality of Information**

#### **Our Standard**

We respect and protect the privacy and security of the information we maintain about our members, customers, business partners, and workers.

#### **Why It's Important**

We maintain significant amounts of Business Confidential Information (BCI), which is a valuable competitive asset of the Company and/or Personally Identifiable Information (PII) of our members, customers, providers, or workers. In the wrong hands, this information could be used to commit fraud, steal personal identities, or compromise our business.

## What We Do:

- Avoid the improper use or disclosure of confidential information in the Company's possession to competitors, suppliers, contractors, or Company workers who are not authorized to receive such information.
- Disclose the minimum necessary amount of information to fulfill a legitimate business need and only to authorized persons or entities, as required by Company policies and procedures and applicable laws. 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

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.

At the Company, PII includes Protected Health Information, State Personal Information and Contract Personal Information. Please refer to the [PII card](#) and the [Information Classification Framework](#).

## WHY WE PROTECT AND SAFEGUARD PII:

The improper use or disclosure of PII can:

- Damage an individual's reputation, cause embarrassment, or result in identity theft.
- Violate federal or state privacy and security laws which could lead to lawsuits or serious penalties for individual workers or the Company.
- Damage the Company's reputation and negatively impact our finances.
- Violate a provision within a government or customer contract.

For more information on our Privacy and Security programs, refer to the [Privacy Office](#) and [Information Security](#) sites.

## Business Confidential Information

BCI, 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. Be careful with this information as improper disclosure could pose serious consequences.

## What We Do:

- Avoid accidentally disclosing information by not having public discussions about BCI and never leaving BCI unattended.
- Share BCI only with those who need to know within the Company.

### What We **Don't Do**:

- Share information related to potential business relationships, purchases, mergers or acquisitions or other organizational changes with anyone outside the Company.
- Share PII or BCI on any social media platform.
- Post information or engage in online conversations that may directly relate to any Company product, service, or situation without first obtaining Company approval. (Please refer to [Use of Social Media section](#).)

Refer to the [Proper Use of Corporate Assets](#) section for more information on BCI.

### Passwords

You are personally responsible for keeping passwords and security codes confidential and secure and will be held accountable for any misuse of this information.

### What We **Do**:

- Store all Company documents and files in corporate approved locations, so they may be recovered and accessed by the proper individuals.
- Be present to enter passwords and provide oversight whenever an authorized technician works on your computer.

### What We **Don't Do**:

- Share passwords or security codes with anyone, even a technician.
- Allow another person to use your computer while logged in.

### 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.

## QUESTIONS?

Contact the [Legal Division](#) or [Privacy Office](#) to find out if confidential or privileged information may be shared outside of our Company.

For more information on our Privacy and Security programs, refer to the [Privacy Office](#) and [Information Security](#) sites.

Refer to the [Proper Use of Corporate Assets](#) section for more information on BCI.

### Resources:

- [Authentication Controls \(IDs and Passwords\) Policy Authorization Policy](#)
- [Confidential Information Policy](#)
- [Corporate Privacy Minimum Necessary Policy](#)
- [Employee Reference Policy](#)
- [Information Technology and Enterprise Data Office Information Classification Policy](#)
- [Social Media Policy](#)
- [Verification of Identity and Authority Policy](#)

## 3.2 Work Environment

### Our Standard

We value an inclusive workforce and treat everyone with dignity and respect. Our Company is committed to maintaining a work environment where everyone is protected from offensive, obscene, or threatening behavior, whether in person or while online.

### Why It's Important

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.

We believe that a workforce that reflects the communities where we do business is a great asset, and that valuing inclusiveness creates a more productive and fulfilling workplace.

Being part of an inclusive 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 responsibility to be respectful and not engage in behavior that violates the [Anti-Harassment policy](#).

Note: Our employment practices are based solely on ability and performance and never on a worker's status protected by law.

## Valuing the diverse contributions of all.

### Protected Status includes:

- 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

## Harassment, Discrimination and Bullying

We do not tolerate any form of discrimination or harassment.

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 misconduct out of our business.

All 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.

### What We Do:

- Identify when actions, language, written materials, or objects are being used in a harassing or intimidating way, regardless of the communication method used.
- Report any incidents of harassment, discrimination, and bullying.

### What We Don't Do:

- Tolerate bullying or any form of discrimination or harassment by workers, customers, suppliers, or others.
- Single out anyone for negative treatment.

**What is bullying?** Using your position to unfairly influence, intimidate or harm someone.

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

**What is sexual harassment?** 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.
- 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.

## Reporting Options



**Web Reporting Tool**

**AND**



**Corporate Integrity HOTLINE  
(1-800-838-2552)**

If you believe you have been the subject of sexual harassment, notify your manager or the [Human Resources Department](#).

You may also use the [Web Reporting Tool](#) or call the **Corporate Integrity HOTLINE (1-800-838-2552)**.

## Use of Social Media

Social media allows us to participate in conversations related to things we care about, including our work. However, it is also prime ground for attackers to collect information on an individual that can be used to target a company. It's important that we exercise caution when sharing online and use good judgment when communicating internally through tools such as Viva Engage and Teams or externally through social media sites and platforms.

Remember, you are personally responsible for the content you publish online, whether in a blog, social media platform, or any other form of digital media.

## What We Do:

- Abide by the Company's policies, procedures, and corporate standards online and offline, even if the profile or the page/forum in which we post is listed as "private" or "closed."
- Comply with copyright laws.
- Immediately correct mistakes made on social media. If you believe the mistake may have compromised the privacy of our members or revealed proprietary or confidential Company information, report it to your manager as additional action may need to be taken.
- Be professional and appropriate in your communication and consistent with our core values.
- Disclose relationships with the Company on any endorsements of our products, services, or events.
- Support the Company's efforts in our communities by posting and sharing pictures and videos of community events, speaking engagements, employee events, and open job opportunities.
- Review the privacy and security settings on the site and understand a site's terms of use.
- Avoid uploading content that might compromise the security of our offices, including remote or home offices, or the privacy of workers or members. Inadvertently disclosing confidential or proprietary information can happen if a photo includes a computer screen or documents.
- Report posts made by the Company, worker, or a vendor that violate any of our policies.

## What We Don't Do:

- Use social media as a substitute for a proper [Corporate Resource](#) to report a concern.
- Post comments/views as if speaking on behalf of the Company, unless specifically authorized. Consider using a disclaimer such as: "The postings on this site are my own and don't represent my employer's opinions."
- Use your company email address to sign up on any social media platform.

## Security and Safety

Our Company is committed to providing a safe and healthy work environment free from violence, threats of violence, illegal drugs, and the influence of alcohol.

You are responsible for adhering to all Company policies, procedures and corporate standards related to workplace safety and security. While on Company premises, wear and use identification badges in accordance with policy. If applicable, wear other protective gear as required.

## Statement on Human Rights

We conduct business with integrity and respect the human rights of all our workers and those with whom we do business. This overarching commitment to human rights is echoed throughout our policies, procedures, Codes and Company communications.

We are committed to being a responsible corporate citizen that uplifts the communities we serve. We adhere to all applicable employment laws and regulations including the prohibition of forced labor and human trafficking, and foster an environment free from harassment, discrimination, or retaliation.

## Q&A

**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 manager, report your concern to [AskHR](#), call the **Corporate Integrity HOTLINE (1-800-838-2552)** or use the [Web Reporting Tool](#).

**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 manager or to another [Corporate Resource](#) for appropriate investigation. We do not tolerate harassment, and we expect you to report it if you see it.

## QUESTIONS?

Contact your manager or a [Corporate Resource](#).

### Resources:

- [Alcohol Free and Drug Free Workplace Policy](#)
- [Anti-Harassment Policy](#)
- [Employment Reference Policy](#)
- [Equal Opportunity Employment Policy](#)
- [Non-Retaliation Policy](#)
- [Respiratory Virus Policy](#)
- [Safe and Secure Workplace Policy](#)
- [Social Media Policy](#)

## 3.3 Proper Use of Corporate Assets

### Our Standard

We use and maintain Company assets responsibly and in accordance with Company policies.

#### Why It's Important:

Our Company's assets are the tools and information that help us do our job and keep our business running effectively.

#### Example of Assets:

##### Tangible

- Building
- Supplies
- Furnishings
- Equipment

##### Intangible

- Confidential information
- Intellectual Property
- Company systems
- Brand
- Reputation

#### What We Do:

- Protect assets from loss, damage, or misuse.
- Ensure that assets are only used for valid Company purposes.
- Avoid sharing confidential or proprietary Company information with unauthorized parties such as competitors, suppliers, or outside contractors without proper authorization.

Report instances of misuse, damage, or theft of Company property to management or another [Corporate Resource](#), who will investigate and take appropriate action.

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

Certain business information and trade secrets also need our protection. These assets include all ideas, inventions, discoveries, improvements, and innovations, such as new product designs, marketing plans, computer programs, financial information, and provider discounts.

### Use of the Internet and Other Electronic Media

Remember that our Company's communication systems (e.g., phones, voicemail, 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
- Offensive, threatening, or malicious
- Criminal or promote criminal activity
- Sexually explicit

Follow Company policies when using technology. While occasional personal use of our communication systems is allowed, workers 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 applicable laws.

For information on use of social media, see the Confidentiality of Information Integrity Standard or speak with management.

### Responsible Artificial Intelligence (AI) at our Company

Artificial Intelligence can help our Company solve problems faster, enhance decision making and help us ensure all our members receive the right care at the right time. It is changing the way that we work. However, while we recognize the powerful contributions of AI, we are committed to using AI ethically and responsibly. Workers can be confident knowing that our Company there is always a "human at the helm" when it comes to AI or Generative AI powered processes or tools. We have a Responsible Artificial Intelligence Committee that reviews all AI projects, and additional governance committees are in place for review and approval of AI initiatives.

## RESPONSIBLE AI

### QUALITY

We hold ourselves (and our partners) to high standards of quality when it comes to the work products we create, whether those deliverables are produced using AI or not.

Work products generated using AI are held to the same standards as those created without AI.



### RESPONSIBLE USE

Our AI solutions adhere to our Code, corporate policies and procedures, just as they would be if they had been created manually.



### ACTIVE ENGAGEMENT

Leadership and staff encourage frank and open conversations with team members about the use of Generative AI to complete certain tasks.

- AI machines should not be deployed autonomously.
  - AI requires judicious oversight.
- Our Company's governance framework reflects our corporate values.

### OUR COMMITMENT:

Artificial intelligence at our Company is actively supervised and well governed.

## Unauthorized Software

Protect our Company's computer systems by never loading unauthorized software onto Company-owned PCs, workstations, or other computer systems. This also includes applications in the cloud, referred to as Software-as-a-Service. Those applications must be routed through the appropriate approval process.

Before taking action, contact the appropriate Information Technology personnel, who must approve and possibly install any software.

## Respecting the Property Rights of Others

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.

# Q&A

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

**A** **No.** Customer lists are highly confidential and should never be disclosed to anyone outside of the Company without specific management approval.

**Q** I would like to watch March Madness basketball on my work computer during my lunch time. Is it okay to download the streaming service? I will be watching on my own time.

**A** **No,** downloading any streaming service or other unauthorized software is strictly prohibited and could expose the Company to very harmful malware.

## QUESTIONS?

Contact your manager or a [Corporate Resource](#).

### Resources:

- [Confidential Information Policy](#)
- [Proper Use of Company Assets Policy](#)
- [Social Media Use and Requirements Policy](#)
- [T.04 Internet, Email and Electronic Communications](#)
- [Desktop Software Distribution and Installation Standard](#)
- [Responsible AI Committee](#)
- [Artificial Intelligence Governance](#)

# 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 **When the Government is our Client**

#### **Our Standard**

We understand and strictly comply with the laws, regulations, Exchange requirements, and special obligations of our government contracts, all while performing with the highest degree of integrity.

#### **Examples of government contracts**

In your role, you may directly or indirectly perform work related to:

- Exchange requirements pertaining to our business under the Affordable Care Act
- Indian Health Service
- Medicare
- Medicare-Medicaid Alignment Initiative (MMAI)
- Medicaid, state, or municipal government employee benefit program

### Why It's Important

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 or when we provide employee benefits to a municipal government entity. Whether you directly or indirectly perform work related to government contracts, we have a special responsibility to the government, beneficiaries of government programs, employees of government entities and the public at large to ensure that we meet these requirements.

If we don't, we are not only failing to support our members' needs, but we put the Company at risk for various enforcement actions (sanctions, fines, penalties, etc.) and could lose the opportunity to participate in government programs.

### What We Do:

- Know the terms of the government contract(s) that we are working on and all 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.
- Report issues and risks of government programs non-compliance immediately to your management.

### When Bidding on Government Contracts:

- 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.
- Be aware of any “quiet period” limitations imposed in the RFP.

# Q&A

**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.

**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 manager, use the [Web Reporting Tool](#) or call the **Corporate Integrity HOTLINE (1-800-838-2552)**, where you may report your concerns anonymously and without fear of retribution.

## QUESTIONS?

Contact your manager or a [Corporate Resource](#)

### 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](#)
- [Education programs in myLearning](#)
- [Equal Opportunity Employment Policy](#)
- [A Guide for Speaking Up](#)
- [Non-Retaliation Policy](#)
- [Privacy Authorization Policy](#)

## 4.2 Cooperating with the Government

### Our Standard

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

### Why It's Important

Our Company is committed to fully complying with all applicable laws and guidelines, including Centers for Medicare and Medicaid Services (CMS) guidelines when responding to inquiries, audit requests, reviews, or investigations (collectively “requests for information”) by the government or regulatory agency or any designee of the government or regulatory agency.

We comply with the laws, guidelines and Exchange requirements that govern the state and federal programs we administer, e.g., Indian Health Service, Exchange, Medicare, Medicare-Medicaid Alignment Initiative (MMAI) and Medicaid, state, or municipal government employee benefit programs. We must also follow the rules and requirements under the Affordable Care Act.

Compliance with these laws is critical to upholding our values and maintaining public trust.

### What We Do:

Follow these practices when working with the government, regulatory agencies, and their designees.

- Always show respect.
- Workers who routinely interface with government, regulatory agencies and their designees should follow job-specific training related to responding to requests for information.
- Workers who do not routinely interface with government, regulatory agencies and their designees should forward any verbal or written requests for information, other than routine inquiries typically received in the normal course of business, to the [Legal Division](#).
- Treat any such requests for information from the government as one of your highest priorities; and work with the Legal, Audit and/or Compliance Departments or management as appropriate.
- Respond to requests for information within the requested timeframe and ensure that the information provided is truthful and accurate.
- Treat vendors working on behalf of a government or regulatory agency as if they are the agency itself.
- 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 instructed in writing by the [Legal Division](#) that it can be released.

### What We **Don't Do**:

- Impede, obstruct, improperly influence the conclusions of, or affect the integrity or availability of any government review or investigation.
- Produce any information without [Legal Division](#)'s approval if they are engaged on the matter.
- 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.
- Attempt to persuade or assist a Company employee or any other person, to provide false or misleading information to a government official or agency.
- Destroy or alter any Company document or record when anticipating or following a government or court request for the document or record.

### 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 from outside sources. This may include things like buying lunch or dinner for, or hosting an event with, a government employee. Because of these restrictions, we do not offer anything of value to a government, public or regulatory official.

### What We **Don't Do**:

- Offer or accept a gift to or from a federal, state, local or foreign political party, government, public or regulatory official, employee, or candidate for an office unless such gift has been approved in advance by the [Legal Division](#) and/or Compliance Department.
- Offer or accept a gift to or from any third party if you know or have reason to know that all or a portion of gift will be offered to such federal, state, local or foreign individuals or entities.

## QUESTIONS?

For additional information, please see the [Anti-Bribery/ Anti-Corruption](#) section. If you have questions as to what those specific legal restrictions may be, contact the [Legal Division](#), Compliance Department, use the [Web Reporting Tool](#) or call the **Corporate Integrity HOTLINE (1-800-838-2552)**.

### 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.

### What We Don't Do:

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

## Q&A

**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.

## QUESTIONS?

Contact your manager or a [Corporate Resource](#).

### Resources:

- [Cooperating with the Government Policy](#)
- [Gifts Policy](#)

# 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**

We are accurate and complete in preparing our business records and fulfilling our financial, legal and reporting obligations.

#### **Why It's Important**

We depend on our data and records to make decisions and meet our obligations every day. When we're accurate, honest and reliable, we avoid discrepancies and reduce risk.

Misrepresenting facts, falsifying, or suppressing records can have serious consequences. If you are feeling pressured, are uncertain and need guidance, or identify inaccuracies, contact your manager or another [Corporate Resource](#).

## What We Do:

To protect the integrity of our records and reporting:

- Follow the proper procedures for maintaining, retaining and disposing of records in accordance with the retention periods required by Company policy and our [Enterprise Records Retention Schedule \(ERRS\)](#).
- Be aware of any unique retention requirements for government business, as some are covered by special regulations or contract obligations.
- Comply with Legal or Tax Holds that require preservation of records even if the retention periods in the ERRS have lapsed.
- Sign a Report Certification when asked. This certification supports the accuracy and completeness of reports, ensures information has been reviewed and encourages disclosure of any issues. demonstrates our Company's commitment to the integrity, accuracy and timeliness of its reports and disclosures.

## What We Don't Do:

- Misrepresent facts, falsify or suppress records.
- 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.

# Q&A

**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.** Even with the best of intentions, breaking down a high dollar claim into smaller claims is a manipulation of our Company's claims processing systems, results in inaccurate Explanation of Benefits to our Providers, and is a violation of Company policies. 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.

**Q** I recently asked for bereavement leave to help settle the affairs of a deceased relative. My manager asked me for a death certificate which really upset me. Can they do that?

**A** **Yes,** Company policy is very specific regarding who may take time off for bereavement. Managers may ask for verifiable information to determine the relationship of the employee and the time off to be granted.

## QUESTIONS?

If you have any questions about records retention, please contact your department's Records Liaison or the [Records and Information Management Department](#).

### Resources:

- [Accuracy of Records Policy](#)
- [Corporate Records and Information Management Policy](#)
- [Corporate Records and Information Management Procedures](#)
- [Enterprise Records Retention Schedule](#)
- [Legal Hold Policy](#)

## 5.2 Quality of Service

### Our Standard

We are committed to providing products and services of the highest quality and value.

### Why It's Important

Our customers are the reason we are in business. When we provide products and services that meet and exceed expectations, we build stronger relationships and demonstrate that we value our internal and external customers.

### What We Do:

- Serve our customers professionally and with integrity, honesty, and respect.
- Provide prompt and accurate services consistent with contractual benefits, corporate policies, and regulatory requirements.
- Comply with all applicable statutes, regulations and instructions that govern the administration of benefit programs.
- Pay all contractual benefits due Covered Persons and Providers promptly and accurately.
- Be proactive and identify new ways to increase the quality of service delivered to our customers while ensuring that it is cost-effective.

## What We **Don't** Do:

- Accept poor working practices.
- Ignore poor working practices.
- Engage in “call avoidance” or “work avoidance.”

**What is call avoidance?** Intentionally delaying or avoiding calls from a member, provider or third party. This is often done by manipulating a system (headset, computer, keyboard, computer mouse, phone, or other Company equipment).

**What is work avoidance?** Intentionally failing to perform your job duties. This may include manipulating systems to record time to reflect that you are working when you are not.

Call and work avoidance can negatively impact members, providers, third parties and your colleagues. It violates our Code and will not be tolerated. Corrective action will be taken, up to and including termination.

# Q&A

**Q** I work in customer service as a Customer Advocate. I have heard that a co-worker answers a call, and then hangs up 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. 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 manager or the **Corporate Integrity HOTLINE (1-800-838-2552)**.

**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 our Code 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 to your manager and the **Corporate Integrity HOTLINE (1-800-838-2552)**.

## QUESTIONS?

Contact your manager or another [Corporate Resource](#)

### Resources:

- [Accuracy of Records Policy](#)
- [Compliance with the Law Policy](#)

# 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 respect the rights of all workers to be engaged in the political process, as permitted by law.

#### **Why It's Important**

Being involved in the political process is one of our fundamental rights as citizens. We're encouraged to vote and participate fully in political activities, but it must remain separate from our work for the Company.

The Company will not reimburse you for personal contributions to political candidates or the Health Care Service Corporation Employees' Political Action Committee (PAC), including any expenses related to personal political contributions (e.g., travel or meals).

## What We Do:

- Participate in non-corporate political activity on personal time and at your own expense.
- Comply with all state and federal laws entitling “time off” for voting.
- Respect others’ political views when different from our own.
- Maintain a position of political impartiality in business and professional relationships on behalf of our Company.

## What We Don’t Do:

- Treat others differently based on their political views.
- Disrupt the work environment based on political views.
- 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.
- Represent the Company when speaking at a meeting or event unless approved by your Executive or Senior Vice President. They will provide guidance and review any proposed presentation with our Company’s Government Relations Department. If you speak independently, make it clear that you are speaking for yourself, and not as an official spokesperson for our Company.

# Q&A

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

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

**Q** Our Company’s 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.

## QUESTIONS?

Contact your manager or another [Corporate Resource](#)

### Resources:

- [Cooperating with the Government Policy](#)
- [Political Action Committee Policy](#)
- [Voting Policy](#)
- [HR Political Activity Policy](#)

## 6.2 Corporate Contributions, Volunteerism and Fundraising

### Our Standard

We make positive contributions to the well-being of the communities where we live, work and play.

### Why It's Important

Our Company is committed to good corporate citizenship and corporate social responsiveness. We support our communities through corporate contributions, volunteerism, and fundraising.

Many of our employees are involved in personal 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.

# Q&A

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

**A** **No**, all contributions need to be coordinated through the appropriate state community affairs department in addition to being documented in our contributions database, CyberGrants.

**Q** Can I engage in fundraising activities at work, even if it is for a good cause?

**A** **No**, fundraising should be done on your own time and not using your Company email, TEAMS chat, or on Company property.

## QUESTIONS?

If you need more information regarding our policies about contributions, volunteering and fundraising, refer to our [Corporate Contributions Policy](#) and [Corporate Volunteerism and Fundraising Policy](#).

### Resources:

- [Corporate Contributions Policy](#)
- [Corporate Volunteerism and Fundraising Policy](#)

# 7.0

## A Final WORD

This Code of Ethics and Conduct reflects our Company's commitment to the highest ethical standards of legal and 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;](#)
- [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 Company's 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 speak up culture.

**For a comprehensive list of resources,  
[view our Corporate Resources.](#)**