

Corporate Code of Conduct



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A message from our President and Chief Executive Officer Anthony Helton

I am proud to serve as the President and CEO of Medical Mutual and our family of companies. For more than 90 years, we've built a tremendous reputation of trust and excellence. We have built an extraordinary culture here, one in which we support each other to champion our mission to help people live healthier through all stages of life. Achieving that mission and vision requires us to uphold the highest standards of ethics and integrity.

Through our actions and interactions, each one of us has the power to be the difference for our members, our customers, our providers, our community and for each other. Please take time to read our Code of Conduct and let it serve as a guide for making the right choices to preserve our highest standards.

Sincerely,



Anthony Helton

A message from our Chief Compliance Officer

Conducting business in an ethical and professional manner is critical to maintaining the reputation and success of Medical Mutual and its Family of Companies. As the chief compliance officer, I am committed to compliance and our efforts as a Company to always do the right thing. The purpose of the Code of Conduct is to provide a roadmap to help you navigate basic principles and laws that govern our business. By understanding these basics, you will help us maintain our strong foundation.

If you have any questions or need additional guidance after reading this Code of Conduct, please reach out to the Corporate Compliance Department. We are dedicated to being your trusted partner in maintaining our culture of ethics and excellence.

Sincerely,

Lynn Fichter



Overview

Being committed to our Code of Conduct allows us to conduct business ethically and honestly.

Our Code provides a blueprint of our Company's expectation for ethical behavior. Not only does commitment to the Code create an environment of respect, but it also helps us produce results.

In this policy, you will learn more about:

- Our corporate mission and values and how they should influence our daily actions.
- Our Service Philosophy and Standards and how we strive to do what is best for our customers and the community.
- The importance of being compliant with internal policies, as well as external laws and regulations.
- Various corporate policies that must be followed to continue to promote an ethical culture.

Who does the Code apply to?

Our Code applies to every employee, contractor and consultant. From a temporary employee to an executive, we expect everyone to commit to the standards mentioned in this policy. Not only do we expect our employees to commit to our Code, but we also expect our vendors and other third parties to commit to our standards of ethical conduct. To protect our Company even further, third parties also have to agree to the standards of our Vendor Code of Conduct, located on PartnerNet under Corporate Policies.

What if I need to report a Code of Conduct violation or have a question that is not answered in the Code?

- Talk with your supervisor or manager. If they cannot answer your question, they can point you in the direction of someone who can help.
- Contact the [Corporate Compliance department](#). Corporate Compliance is a resource for employees on Code of Conduct questions and can also help address any concerns you may have.
- Access the [Compliance Connection](#) website, where you can anonymously report violations.
- Talk with your HR Business Partner. Every department is assigned an HR Business Partner as a resource to help with employee questions and concerns.
- Review the corporate policies on PartnerNet. There may be a specific policy that addresses your question or resolves your concern.

Reporting violations anonymously: Compliance and Ethics Hotline.

To report a concern anonymously, call the **Compliance and Ethics hotline at 1-800-553-1000.**

All employees are expected to report any known or suspected violations of the Code of Conduct. If you are uncomfortable reporting concerns to a supervisor, senior management, or through other reporting channels, you can report a concern anonymously using the Compliance and Ethics hotline. This hotline is managed by a third-party service, ensuring that all reports remain confidential to the greatest extent possible.

We have zero tolerance for retaliation

Our Company highly encourages employees to speak up and report potential or actual violations of the Code. Reports can be made without fear of retaliation. You will not be punished or retaliated against by your management or the Company if you report a violation in good faith. Reports of retaliation will be taken seriously and reviewed in a timely manner. Retaliating behavior will result in disciplinary action, up to and including termination. We want employees to feel comfortable with doing the right thing safely and securely. For more information, please read the Non-Retaliation policy.

How do I encourage a co-worker to speak up about a concern?

Reporting violations can be challenging. To encourage your coworker, remind them not to be afraid because they can report violations without fear of retaliation or anonymously if needed. Also, emphasize that reporting violations is an important component in our commitment to our Company mission and values. We can't address issues if we don't know about them.





Committing to our Company Mission and Values

Corporate Mission: Uniting with our partners to help people live healthier through all stages of life.

Corporate Values

- **Integrity:** We act with the utmost sincerity and in the best interest of our groups and members.
- **Honesty:** We act in an honest and transparent manner in all transactions.
- **Respect:** We show respect to our fellow employees and to our members at all times.
- **Commitment:** We are committed to the communities where we live and work. Our actions should demonstrate this commitment.
- **Excellence:** We deliver excellence by acting in a way that produces the best possible outcome for our groups, members, and communities.
- **Strength:** We do all that we can to ensure the Company's financial strength continues.

Our mission and values are the foundation of how we perform our jobs on a daily basis. Whether we are working with internal business partners, members or third-party organizations, our mission and values give us a sense of what we are as a Company and promote strong ethical behavior.

Committing to our Service Philosophy and Service Standards

Service Philosophy: We strive to create peace of mind. Our customers can trust us to do things right and to help them get value from their health plan.

Service Standards

- **Respectful:** Show respect during our interaction with customers.
- **Accurate:** Be knowledgeable of our job functions so that we provide correct information.
- **Responsive:** Answer requests and handle issues in a timely manner.
- **Accountable:** Own any mistakes. Resolve the issue and create processes that will prevent recurring ones.
- **Simple:** Responses and communications should be easy to understand.

Without our customers, it would be challenging to sustain business. We must always strive to provide the best service, not only to our external customers, but also to our internal customers or business partners. These elements position us for success.

Our leadership team is essential to creating an ethical culture

- Create an environment that allows our employees to feel safe when raising ethical concerns.
- Be aware of your words and actions.
- Play a role in educating your staff. Encourage them to remain knowledgeable of Company and industry news.
- Assist in enforcing the Code. Ensure that your staff is aware of the Company's compliance and ethical expectations.
- Be knowledgeable of corporate policies that address compliance and ethics.
- Report potential or actual violations in a timely manner.

Employee responsibilities

- Be familiar with the Code and follow Company policies and procedures. If you violate the Code, you could receive corrective action up to and including termination of employment.
- Consider our Company's values in our daily job responsibilities and work to preserve our reputation.
- Report suspected Code of Conduct violations promptly.
- Cooperate with all investigations.
- Perform assigned tasks in a responsible, reliable and cooperative manner.
- Expect all business partners to act with the highest degree of ethical behavior and follow the standards in this Code.
- Remain sensitive to the needs and expectations of our policyholders, coworkers, providers, government agencies and the communities we serve.
- Display professionalism at all times when interacting with customers, business partners and each other.
- Never engage in conduct that violates federal or state laws or regulations.
- Support our Company's commitment to establishing and maintaining an inclusive and diverse workforce.

Personal Behavior

- Maintain a work environment where everyone is treated with respect, honesty, and dignity and avoid conduct that interferes with the operations of or discredits the Company or its employees.
- Comply with all Company policies.

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- Help ensure that Company business is conducted on an inclusive basis that develops and maintains a culture of diversity in our Company.
- Use our Company's resources, including time, equipment, supplies and facilities, responsibly. This reduces Company costs. An accurate accounting of expenses incurred on behalf of our Company must be reported through expense reports.
- Never commit theft or misappropriation of our Company's funds, records and reports.
- Never destroy Company property.
- Never make false, misleading or purposefully inaccurate statements to coworkers, customers, business partners, regulators or law enforcement officials.
- Never report to work under the influence of alcohol, illegal drugs or controlled substances. Also, we must not be involved in the sale, manufacture, distribution or possession of illegal substances or drug paraphernalia, particularly on Company premises, on Company business, or while operating a vehicle while on Company business.
- Never attend a company function or event in an intoxicated state or behave in a disorderly manner in any instance while at work or when acting as a representative of the company, including events outside of the office when other employees, vendors, customers or prospective customers are present.
- Never possess weapons of any kind on Company property or at work-related events or functions.
- Never engage in conduct that violates federal or state laws or regulations, such as violent behavior, sexual harassment or discrimination.
- Never engage in conduct that violates our Company's commitment to establishing and maintaining an inclusive and diverse workforce and supplier network.

We are committed to being compliant.

Government regulations

Antitrust Laws

Federal law prohibits any agreement among competitors that could reduce competition.

- Always be honest about our products and services when submitting bids to customers.
- Never speak with competitors about prices, promotions, refusals to deal, or specific customers.
- Never use a competitor's confidential or proprietary information.
- Never use a competitor's current bid if you are involved in bidding, especially on government contracts.
- Never use information on a competitor that someone offers to sell.

False Claims Act

Our Company is subject to the False Claims Act. This act imposes financial penalties on individuals or organizations when the federal government recovers money received through fraud by government contractors, subcontractors or those participating in a government program. We must never provide false or misleading information to any government official/ agency or attempt to persuade another to do so.

- Never knowingly present, or cause to be presented, a false claim for payment or approval.
- Never knowingly use or make a false record or statement to get a false or fraudulent claim paid.
- Never conspiring to commit any violation of the False Claims Act.



Government Contract Compliance

Those of us working in departments that administer government contracts such as Medicare Advantage, our contract to sell plans on the Federal Exchange and plans covering federal employees; must be aware of and comply with all statutory, regulatory and program requirements related to that contract. We are committed to providing appropriate resources and training to applicable departments. The [Resources tab](#) on PartnerNet has information and policies that address governing these programs.

The Role of the Compliance Officer

Our reputation for integrity depends on the actions of our Board of Directors, officers and employees. Violations of this Code or applicable law will be managed by or escalated under the direction of the Chief Compliance Officer and the results will be reported appropriately to the Board of Directors. The Chief Compliance Officer is also responsible for compliance monitoring and Code of Conduct training and enforcement.

Fraud and Abuse

Fraud and abuse are any activities done in an attempt to receive some unauthorized benefit. Our Company is proud of our accomplishments in fighting fraud and abuse. To assist in fighting fraud and abuse you should always:

- Complete all reports accurately. Reports can include expense reports, time sheets and purchase orders.
- Immediately report any suspicious activity to management, Human Resources, the Chief Compliance Officer, the Compliance Helpline or Compliance Connection.
- Never make false or misleading statements to any accountant, auditor or anyone else.
- Never alter information provided by customers or vendors or accept information knowing it has been altered.



We are committed to communicating truthfully and responsibly.

Social Media Guidelines

As social media become more prevalent in society, the lines between an employee's personal and professional lives can easily become blurred. Our Company respects individual privacy and does not seek to unduly interfere with employees' use of social media. However, conduct that has the potential to have a negative impact on our Company or its image is a legitimate business concern. We must never take any actions through social media that could harm our Company, customers, business partners or each other. Please see the Social Media policy for more information.

I was on my Facebook account and someone I knew posted a picture of one of our co-workers at a Company-sponsored event. Is this okay?

Yes, as long as the posted material was not offensive, there is no issue with sharing photos of individuals at Company events.

News Media Guidelines

Inquiries by the news media about Company matters are coordinated through the Corporate Communications department. Designated spokespeople are the only employees authorized to speak on behalf of the Company.

- If you are approached directly by a reporter to comment on Company business, politely direct them to the Corporate Communications Department for assistance.
- Never provide a comment to the media about Company business unless the inquiry is coordinated by Corporate Communications.
- You are always on the record and anything you say can be quoted.
- Always be courteous and professional.

Please see the News Media Guidelines policy for more information.

My neighbor works for the newspaper and asked me how the company reacted to recent changes in insurance laws. Can I let him quote me?

No. Only the Corporate Communications department staff is authorized to respond on behalf of the Company. If you are asked your opinion on an issue, you must make it clear that you are not answering on behalf of the Company.

We are committed to having high expectations of our vendors.

Vendor Expectations

It is our responsibility to oversee any vendors that we engage in our business areas. We expect all vendors, contractors and business partners to do business in a law abiding manner and with the highest degree of ethical behavior. Please review the Vendor Code of Conduct, located on PartnerNet under Corporate Policies.

We are committed to disclosing situations that could create conflicts of interest for ourselves or the Company.

Conflict of Interest

A conflict of interest occurs when our personal, social, political or financial activities conflict with our ability to act in the best interest of our Company. The activities of our family and friends can also create conflicts of interest. To help avoid conflicts, we must not let our outside activities interfere with performing our job responsibilities. Even if a conflict does not exist, the appearance of a conflict to others can be damaging to the reputation of our Company and to us individually. Please review the Conflict of Interest policy for more information including conflict of interest examples and disclosure requirements.

I started a web design business. As a web developer for our Company, is this okay?

In certain circumstances, this is okay, but you should not use Company resources for your personal business. You should talk with your manager to make sure you are not violating the Conflict of Interest policy.

Gifts, Entertainment, and Third-party Travel

Employees must not give or receive gifts, entertainment or third-party travel that could be perceived as an attempt to improperly influence decisions of business partners or ourselves.

- We must never give or receive cash.
- Our CEO must approve any travel expenses or incentive trips paid by an outside party.
- Gifts, gratuities or favors should not exceed \$100 per occurrence and \$200 per year. If they do exceed these amounts, they may be accepted only with the written approval of your Executive Vice President, CFO or CEO.
- All received gifts, entertainment, and third-party paid travel must be disclosed by completing a Gift and Third Party Paid Travel Disclosure form located on PartnerNet under Online Forms.
- Please see the Gifts and Third Party Paid travel policy for more information.

If one of our customers offers me tickets to a concert or any other event, can I accept?

If their value is more than \$100, you must get approval from your EVP, the CFO or the CEO of the Company. The gift must also be reported to the Chief Compliance Officer by completing the Gift and Third Party Travel Disclosure Form.

Political Activities

If we hold an elected or appointed position with a public body, we must disclose that information to the Company within a reasonable time after election or appointment by completing a [Conflict of Interest Form](#). Please review the Voting and Political Activities policy, which includes more information on Company expectations.

I am running for an office in my hometown and holding a fund raiser after work. Is it okay to invite my co-workers to this fund raiser?

As long as you do not use Company resources, and there are no implied endorsement expectations, this would not be a violation. Each individual has a right to decide whether or not to attend the event.

Related Party Transactions

A Related Party Transaction is any transaction, arrangement, or relationship (or series of transactions, arrangements, or relationships) where:

- The Company was, is, or will be a participant.
- The amount involved exceeds or will likely exceed \$120,000 in any single calendar year; and
- The “Related Person” has a material direct or indirect interest in the contract or transaction.

A “Related Person” is:

- 1. A Board member of our Company;*
- 2. Anyone at our Company with the title of Director or above;*
- 3. An immediate family member of a person identified in (1) or (2) with decision making authority or in a position of leadership for another organization*

We should only enter into related party transactions in accordance with Company policy. We should also make sure we disclose possible and actual related party transactions on our Conflict of Interest forms. Please see the Related Party Transactions policy for more detailed information.



My sister is a Vice President for one of our business partners. Is this considered a Related Party Transaction?

If you are a Director or above and have decision making authority in contracting with the business partner, and the business partner provides services or supplies to the Company with a value \$120,000 or greater in a year, it would be considered a Related Party Transaction. This would need to be disclosed on the Conflict of Interest form.

We are committed to promoting ethical and respectful behavior.

Anti-Fraternization

Employees who develop relationships that are outlined in the Anti-Fraternization policy must immediately notify and disclose the relationship to their manager or Human Resources to allow the Company to take appropriate action if needed (including, but not limited to, a possible transfer of one of the individuals involved).

My spouse and I work for Medical Mutual, but in different departments. Is this okay?

This is okay if you do not report to your spouse (or vice versa) and you both do not have the same reporting chain. As best practice, always discuss with your manager and disclose this information to the Chief Compliance Officer (using the Conflict of Interest Disclosure form).



Workplace Bullying

Our Company promotes a healthy workplace culture where all employees are able to work in an environment free of bullying behavior. We consider workplace bullying unacceptable and will not tolerate it under any circumstances, regardless of employee status. Please review the Workplace Bullying policy for more information.

I feel like I am being bullied by my coworker, but am not sure. What should I do?

Anyone who feels they are experiencing bullying or witnesses bullying behavior should report it immediately. It can be reported to your supervisor, your Human Resources business partner, or Compliance Connection. All reports can be made without fear of retaliation. Remember: You have the option to remain anonymous when using Compliance Connection, but we ask that you provide as much information as possible for investigation.

Workplace Harassment

Our Company will not tolerate harassment of any kind. Harassment of employees based upon race, color, religion, sex, gender, age, national origin, disability, sexual orientation, gender identity, or any other protected characteristic is strictly prohibited by the Company and is also against the law. Read more in the Company's Sexual Harassment and Workplace Harassment policy.

I have a co-worker who told me her manager makes offensive comments to her about her gender. Can I report this?

Yes. Even though you are not the victim of the offensive conduct, you should still report this to Human Resources, the Compliance Helpline or via Compliance Connection.

We are committed to protecting our Company property and information.

Company Funds

We are personally accountable for Company funds that we control and are responsible for maintaining the appropriate documentation of those funds. When we spend Company money, or personal money that will be reimbursed, we should always make sure our Company receives appropriate value in return.

Company Property

Company property must only be used for legitimate business purposes. Excessive or inappropriate personal use of our Company's telephones, e-mail or Internet is prohibited.

Proprietary and Confidential Information

Confidential and proprietary information are vital business assets and should not be disclosed to anyone (internally or externally), unless there is a legitimate business need to share this information. We must never disclose confidential or proprietary information, either during or after termination of employment.

Record Management

- Handle all Company records in accordance with our Company's corporate policies.
- Maintain the confidentiality of the Company's proprietary and sensitive information.
- Maintain and destroy records in accordance with our Company's corporate policies.

To learn more, please read the Records Governance Policy for Paper and Electronic Records policy.

HIPAA Privacy

It is important for our success and reputation to protect our members' information. We have strict reporting obligations to our members and our group customers whenever data is disclosed to someone who should not have it.

- Be diligent before sending emails and report any incidents of inadvertent disclosures in a timely manner using our HIPAA [Data Exposure Form](#).
- Do not release Social Security numbers without obtaining authorization to do so. Read the Social Security Number Access and Disclosure policy for details.
- Review our corporate HIPAA policies on PartnerNet.

A Final Thought

Commitment is a Corporate Value that our Company embraces everyday. We succeed by doing the right thing, acting ethically and delivering what is promised to our customers, our community, and each other. The value we place on commitment in our Company is what allows us to maintain our fine reputation. This Code is the foundation that our Company is built on, and we are what bring it to life. This Code should be used as a guide to us as we represent our Company. Everything we do is an opportunity to put our high commitment level into action.

Commitment drives excellence!



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