

Blue Cross NC Code of Conduct



A Note from the Chair of the Audit Committee of the Board

Dear Blue Cross and Blue Shield of North Carolina Employees and Board Members:

The Blue Cross and Blue Shield of North Carolina (Blue Cross NC) Code of Conduct provides important guidelines for ethical and lawful conduct for every employee and member of our Board. The Code of Conduct is more than a set of rules; it puts our Values into action. The Code of Conduct contains the principles governing our work and is a guide to help us make the right decisions every day.

Each one of us has a personal responsibility to conduct Company business in an ethical and lawful manner. That means all our actions must comply with the highest ethical standards and the principles set forth in our Code of Conduct. Pressures of the moment should never cause us to behave in any other manner.

Each of us also has a responsibility to report any known or suspected ethical or compliance concerns. These concerns can be reported to a supervisor and/or other management. If you are uncomfortable reporting a concern to management or do not receive a satisfactory response, you may report your concern to the Ethics Team. You can make a report by calling the Ethics Hotline at 1-888-486-1554 or by completing a Code of Conduct Inquiry or Reporting Form on the intranet. When you report your concern on the Hotline or the intranet, you may remain anonymous if you wish. Retaliation against anyone who reports a concern or assists in an investigation of a concern will not be tolerated.

As chair of the Audit Committee of the Board, I am proud to be associated with each of you. I encourage you to become familiar with the Code of Conduct and apply its principles in every act you undertake on behalf of our Company.

Sincerely,



Heather Cozart

Chair, Audit Committee of the Board

Message from Tunde Sotunde, President and CEO

Since 1933, Blue Cross and Blue Shield of North Carolina has been committed to improving the health and well-being of our customers and communities. Our customers depend on us to deliver quality products, information and services. We are trusted because we hold ourselves to high standards.

We are at an exciting juncture in our history. Together, we are transforming the health care landscape and won't stop until health care is better for all. It is imperative that each of us make the right decisions and take the right actions. We have to do the right thing – and we have to do it every day – in every interaction with each other, with our customers and with our business associates. As part of doing the right thing, you are expected to read and make a personal commitment to follow our Code of Conduct. The Code of Conduct includes our ethical principles and serves as a guide for all of us in upholding those principles.

We also expect each of our leaders to lead with integrity, which includes creating an environment where good people can make good decisions. If you ever have a question or concern about the right thing to do, raise the issue with your manager or with the Ethics Team. Do not allow anything – not “making the numbers” or even a direct order from a superior – to compromise your commitment to integrity. Under no circumstances will we tolerate retaliation against any employee who in good faith raises a concern about a violation of our Code of Conduct.

As we focus on making sure our customers get better, simpler and more affordable health care, our commitment to doing the right thing will be the foundation for our success. Thank you in advance for taking personal responsibility to make sure we maintain an ethical workplace. It is up to all of us to preserve our Company's reputation and commitment to integrity and compliance.

Sincerely,



Tunde Sotunde MD, MBA, FAAP

President and CEO

Blue Cross and Blue Shield of North Carolina
CuraCor Solutions Corp.

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Introduction

Blue Cross NC Code of Conduct

Our Purpose

To improve the health and well-being of our customers and communities – we won't stop until health care is better for all.

Our Values

At Blue Cross NC, our Values (People First, Every Customer Matters, Show Grit, Think Data and Innovate to Elevate) inform how we show up each day in service of each other and our Purpose. They are the foundation we draw on to guide ethical decision making, which reinforces the trust invested in us by our customers, business associates and fellow employees. It is not enough to merely avoid “breaking the rules.” Each of us is expected to use our best judgement to act in ways that support a culture of trust and integrity.

Corporate Social Responsibility

Our commitment to Corporate Social Responsibility

Our commitment to corporate social responsibility (CSR) brings our Purpose to life and ensures our actions have clear goals, metrics and oversight.

Our work encompasses the following four pillars:

- **HEALTHY MEMBERS:** We are committed to improving our members' access to quality, affordable health care.
- **HEALTHY COMMUNITIES:** We connect with and elevate the voices of our communities. We donate our time, talents and funds to improve health for all.
- **HEALTHY WORKFORCE:** We provide a work environment that attracts and retains employees, ensuring positive well-being and experience through training, mobility, inclusion and belonging. Our efforts also include fair treatment of workers and protection of human rights.
- **HEALTHY BUSINESS:** We are committed to conducting responsible and ethical business and operating in an environmentally responsible way. We recognize human rights and strive to extend our responsible business practices to our supply chain, fostering resilience and diversity.

The Blue Cross NC Compliance and Ethics Program

The Compliance and Ethics Teams exist to support Blue Cross NC's continued success while maintaining its commitment to the highest ethical standards. The goal of the program is to promote an organizational culture that encourages ethical conduct and a commitment to compliance with the law and, through exercise of due diligence, to prevent and detect criminal, illegal and unethical conduct.

Our Commitment to Integrity

Blue Cross NC Code of Conduct

Blue Cross NC is committed to conducting our business dealings with honesty, integrity and fairness. We always try to do the right thing.

Why does Blue Cross NC have a Code of Conduct?

The Code of Conduct defines what Blue Cross NC expects of its employees. The Code of Conduct is a resource you can rely on to determine what is appropriate when it comes to acting ethically in the workplace. It is a statement of the principles and expectations that guide ethical business conduct at Blue Cross NC. Our Code of Conduct describes how you can align your goals and actions with the goals of the Company.

Blue Cross NC complies with all laws and regulations that apply to our business and will take necessary steps to prevent unethical or unlawful behavior. We will also take necessary corrective actions to prevent a repeat violation.

Who does the Code of Conduct apply to?

Our Code of Conduct sets out some of the most important policies that govern our business. The Blue Cross NC workforce, all subsidiaries (unless specifically excluded*) as well as members of the Blue Cross NC Board of Trustees and the Board of Directors for CuraCor Solutions, Corp. (collectively the “Board” or “Board Members”) must follow the Code of Conduct. We also seek to do business with suppliers, providers and vendors who adhere to similar ethical standards. Only the Board or a Board Committee may waive Code requirements.

* Currently excluded subsidiaries include ACS, Brighton Health Plan Solutions, and FMBCNC, LLC.

Leaders, by virtue of their positions of authority, have additional responsibilities.

An important part of a leader’s responsibility is to set the standard for outstanding business practices. Leaders are expected to reflect Blue Cross NC’s commitment to integrity in both words and actions. As a leader, you are expected to:

- Create and maintain an environment in which employees feel comfortable asking questions or reporting concerns without fear of retaliation
- Recognize and give credit to those who raise concerns
- Help employees understand how the Code of Conduct applies to their positions and everyday behavior

Committed

This Code represents a commitment to do what is right. As an employee of Blue Cross NC, you agree to uphold this commitment. It is your responsibility to understand the requirements of the Code and the standards, instructions and processes that apply to your job and always follow them. Those who fail to follow the Code put themselves, their coworkers and Blue Cross NC at risk.

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- Promote open and honest two-way communications and be a role model who demonstrates respect and consideration for all of our employees
- Enforce Blue Cross NC's Code of Conduct and take appropriate action if violations occur

In addition, due to the nature of their position, executives (generally Vice Presidents and above) and Board Members are also expected to promptly report to the Chief Legal Officer or Ethics and Conflicts Committee any legal, investigatory or enforcement activity involving the executive, including but not limited to: (1) being charged with any criminal offense other than a civil traffic offense; (2) being party to any civil action involving dishonesty, breach of trust or a financial dispute; (3) being the subject of any investigatory, administrative or enforcement proceeding under state or federal law; (4) being refused the grant of any occupational, professional or vocational license or permit or having any such license or permit you hold be subject to any judicial, administrative, regulatory, investigatory or disciplinary action; (5) filing of personal bankruptcy; or (6) being involved in any other legal, investigatory, administrative or enforcement activity that may cause reputational damage to Blue Cross NC or affect a person's ability to fulfill the responsibilities of the person's role with Blue Cross NC, including being declared unfit to serve as an officer or director by a court under the Securities Exchange Act.

What if I don't understand something in the Code?

You must read, understand and comply with the Code. If you have any questions, you are responsible for asking your leader for clarification.

If you believe that you or any other employee may have violated the Code or any applicable law or regulation, you must report your concerns so that the Company can take appropriate action. In many cases, a prompt report of a violation can substantially reduce any adverse consequences to you, to the Company or to third parties.

Remember, you are responsible for your own actions. You are responsible for choosing to act in ways that support our Code of Conduct. No one can make you violate the Code of Conduct. Your role is to do the right thing and ask questions if you're not sure what the right thing is. If you think that something is wrong, or if you're not sure what to do, talk to someone who can help.

What happens if I don't comply with the Code?

Violations of the Code of Conduct are taken seriously. If you fail to comply with the Code or any applicable law or regulation, you will be subject to disciplinary action that may include termination.

Disciplinary measures will depend on the circumstances of the violation and will be applied in a manner consistent with the Company's policies and applicable laws. Intent, personal gain and impact are all factors considered in determining what level of disciplinary action will be taken.

Disciplinary action will be taken against any employee who:

- Authorizes, directs, approves or participates in violations of the Code or applicable laws or regulations

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- Deliberately conceals or fails to report violations of the Code or applicable laws or regulations, or deliberately withholds or misstates relevant information concerning a violation
- Retaliates against or intimidates, directly or indirectly, any other member of the workforce because of a report of a suspected violation of the Code or applicable laws or regulations
- Is a leader who, under the circumstances, should have known about a violation by employees under their supervision, or who did not act promptly to report and correct a violation
- Encourages others to do any of the above

In addition, persons who violate the law during the course of their employment may be subject to criminal or civil penalties, as well as payment of civil damages to the Company or third parties.

Blue Cross NC employees have an obligation to cooperate with investigations related to ethical misconduct. Failure to cooperate and provide honest and truthful answers or information could result in disciplinary action up to and including termination of employment. Depending on the nature of a substantiated violation, the Ethics Team, the Legal Department, Audit or another Blue Cross NC area will promptly address the concern. Blue Cross NC will seek to impose discipline in accordance with our Human Resources [Performance Improvement Policy](#).

If I see something, should I report it?

You are expected to speak up if you see or suspect activity that violates our Code of Conduct. You ensure the continued success of Blue Cross NC

Connecting with our Values

People First: Others are more likely to come forward with concerns if they see you set the example. It's up to all of us to create a trusting environment where everyone feels comfortable raising concerns, no matter how big or small. You can be the solution and make a difference by speaking up.

Every Customer Matters: We act in a manner that shows honor and good character. Seek to understand and be obsessed with meeting internal and external customer needs.

Think Data: Be observant and use data to make decisions. Talk it through before jumping to conclusions.

Innovate to Elevate: We actively support change even when faced with challenges. Strong teams develop by being curious and having open discussion with consideration of others' opinions and ideas.

Show Grit: Be courageous and speak the truth, even in difficult situations. Generate trust and respect by taking actions that match our words.

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by making certain that your actions support our Culture and expecting the same of those around you. Every employee has a responsibility to promptly report any issue or concern they believe, in good faith, may constitute a violation of the Code of Conduct, other Blue Cross NC policies or laws and regulations governing our business. You should also come forward if you encounter a situation that “just does not feel right.” We have all encountered issues that were never fixed because people who knew that something was wrong did not want to get involved. In these situations, the people who observe the behavior without bringing their concerns to someone’s attention fail to live up to their obligation.

Retaliation will not be accepted.

We understand how important it is to provide an environment where people feel comfortable coming forward in good faith. We will take disciplinary action against any employee who takes negative action against or intimidates any other employee who reports, or assists in the investigation of a report of, a potential violation of our Code of Conduct or applicable laws or regulations. Blue Cross NC’s stance on retaliation is complemented by the federal government’s protections for individuals when engaging in “whistleblowing” activities related to federal grants and contracts. Blue Cross NC will not retaliate against any workforce member who has knowledge of potential inappropriate or illegal activities involving federal funds and, in good faith, discloses this information to appropriate government authorities. Always keep in mind that employees who report, or who assist in the reporting of, potential violations are not exempt from accountability for their own involvement in any wrongdoing and are expected to continue to perform their job and follow all Company policies.

Who should I talk to?

If you have a question about the Code of Conduct, or if you have seen or suspect that someone has violated the Code of Conduct, who should you contact?

Start by talking with your manager; give them a chance to help in developing a solution. Since your manager may be your closest link to an issue, they can act as a good resource for problem-solving. This person has a responsibility to listen to you, consider your concern and to help.

If your direct supervisor is unavailable to discuss the problem or concern, or if you are uncomfortable talking with them, you may present the problem or concern to your supervisor’s manager or to another member of your department’s leadership team.

You may contact your [Human Resources People Strategic Advisor](#) or [Employee Relations Advisor](#) at any point.

You may also call the Ethics Hotline at 1-888-486-1554. The hotline is a confidential service that you can call 24 hours a day if you have questions or concerns about the Code of Conduct. You can also submit inquiries or make reports to the Ethics Team online by completing the [Code of Conduct Inquiry Form](#) or [Code of Conduct Reporting Form](#). Both the hotline and reporting form allow for anonymity.

Note: *If you have concerns about the conduct of a member of the Ethics Team, you should report them to the Company’s Chief Legal Officer.*

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If your report involves a financial, accounting or auditing concern, the Vice President of Audit will share your concern directly and confidentially with the Chair of the Audit Committee of the Board and with the CEO and CFO as appropriate. If your report involves potential noncompliance with regulatory requirements that govern our business, you can inform anyone on the Corporate Compliance team, including the Chief Compliance Officer.

The Company's attorneys also have a responsibility to report a material violation of law or breach of fiduciary duty to the Chief Legal Officer.

However you choose to make a report, your concern will be promptly addressed. When you report a potential violation of the Code, the Ethics Team will ensure that an appropriate investigation is conducted.

Can I make an anonymous report?

You always have the option to remain anonymous. One way to make an anonymous report is by calling the Ethics Hotline at 1-888-486-1554. This number has no Caller ID associated with it and is truly anonymous. Another option for making an anonymous report would be to use the [Code of Conduct Inquiry Form](#) or [Code of Conduct Reporting Form](#). Keep in mind that unless you provide a way to get in touch with you, the Ethics Team will be unable to speak with you about your concern.

We understand that confidentiality is important and protect it whenever possible, but we cannot always guarantee your concern will be kept confidential. For example, if you report something that may be a violation of law or if someone may be in physical danger, we have an obligation to respond even if it is impossible to investigate your concern without

identifying the person who reported it. However, we will inform only those who need to know to help investigate, resolve or oversee corrective action on these matters.

If you're hesitant to report a concern because you don't want to be identified, ask yourself which is worse: to be helped by people who may know who you are, or to say nothing and live with the problem? If you're trying to decide between those two options, then it's time to talk to someone.

What information should I provide?

If you contact the Ethics Team with a concern, please be sure to provide enough information about the situation to allow us to investigate it. This is the type of information we need:

- Describe the situation and business area involved
- Identify dates when events or incidents occurred, where they happened and how (e.g., Was a procedure followed or not? Did a supervisor or manager give an instruction? Did a co-worker or group of employees decide on an action?)
- Give the name(s) of the individual(s) involved
- Include whether you know about the situation from direct observations or whether someone told you about it
- List the name(s) of other individual(s) who know about this situation
- Describe relevant documents and identify their location
- If you make an anonymous report, you may remain anonymous, but please contact us again so we can ask any necessary follow-up questions

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What happens after I make a report?

The response to any report ultimately depends on the circumstances. However, know that when you make a report, we will listen to you and take you and your concern seriously.

A typical response includes:

- Review of the allegation(s) and assignment of the case to the most appropriate area (ex. Ethics Team, Employee Relations, Privacy, SIU)
- Interviews with possible participants
- Reviews of relevant documents, files and printed material
- Interviews with possible witnesses
- A decision-making process to determine if the report is substantiated and if a violation of our Code of Conduct, Blue Cross NC policy or the law has occurred

If you become aware of an Ethics investigation, you should avoid questioning others in order to determine who may have reported the violation. Doing so may compromise the integrity of the investigation and also be perceived as retaliation.

Reportable Events

In the event that, at the conclusion of any investigation, Blue Cross NC determines there is a reportable event, including, but not limited to, those required to be reported under the Significant Events Clause of CS 1039 or as outlined in 48 CFR 52.203-13, the Ethics Team will consult with the Compliance Officer and the Legal Department to determine appropriate steps to disclose the reportable event to the appropriate regulatory entity.

Our Commitment to Each Other

Blue Cross NC Code of Conduct

At Blue Cross NC, we are proud to support a culture that is safe, professional and supportive of teamwork and trust. Diversity and inclusion are valued as fundamental pieces of our success.

We respect each other.

We expect each employee to treat fellow employees, members and business associates professionally and with respect. It is up to each of us to treat one another professionally and to hold ourselves – and each other – accountable for both appropriate and inappropriate behavior.

Examples of Appropriate Behavior:

- Respecting and valuing the contributions of all employees, regardless of their status or role in the company
- Treating employees and customers with respect, civility and courtesy
- Working collaboratively and honestly with each other
- Respecting and valuing the views and opinions of others, even though they may differ from our own
- Creating space where people can speak honestly, listen to understand, and effectively and respectfully manage disagreements
- Recognizing that differing social and cultural standards may mean that behavior that is acceptable to some may be perceived as unacceptable or unreasonable to others
- Complying with company policies and procedures and addressing any dissatisfaction with, or violation of, policies and procedures through appropriate channels

Connecting with our Values

People First: Do your part to make Blue Cross NC a great place to work. Treat others with respect and model the behavior you expect from your co-workers.

Every Customer Matters: Whether working with internal or external customers, always listen respectfully to each other's opinions and ideas.

Innovate to Elevate: Innovation is sparked when we seek out and appreciate the diverse perspectives each of us contributes.

Examples of Inappropriate Behavior:

- Using profanity or language that is intended or is perceived by others to be demeaning, berating, rude, threatening, intimidating, or hostile
- Engaging in bullying or microaggressions
- Making threats of violence, shouting or engaging in other conduct or mannerisms that are reasonably perceived by others to be threatening
- Making or telling jokes that are intended or perceived by others to be demeaning, crude or offensive

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- Teasing, name calling, ridiculing or making someone the brunt of pranks or practical jokes
- Using disparaging epithets, slurs or negative stereotyping
- Distributing or displaying electronic or written materials or messages that are abusive, profane, threatening or disparaging
- Throwing tools, office equipment or objects as an expression of anger, criticism or threat, or in an otherwise disrespectful or abusive manner
- Making comments or engaging in behavior that is untruthful or directed as a personal attack on the professional conduct of others
- Engaging in any pattern of disruptive behavior or interaction that could interfere with the workplace or adversely impact the quality of work

You are free to do your job without fear of discriminatory harassment.

Blue Cross NC prohibits conduct that singles out an employee or group of employees in a negative way because of their race, color, ethnicity, religion, sex, sexual orientation, gender (including gender identity and transgender status), pregnancy, marital status, national origin, age, veteran status, physical or mental disability, genetic information, or any other characteristics protected by federal, state, or local law.

Harassment can take many forms, including offensive remarks, unwelcome advances, requests for sexual favors, jokes and ethnic, racist or sexual slurs. Any form of harassment is a violation of [Blue Cross NC's Harassment policy](#).

We do not discriminate.

Blue Cross NC is proud of its diversity and is committed to maintaining a diverse workforce. We seek and value diversity among our employees. It is our [policy](#) to make decisions in hiring, developing and promoting employees – all employment processes – without regard to race, color, ethnicity, religion, sex, sexual orientation, gender (including gender identity and transgender status), pregnancy, marital status, national origin, age, veteran status, physical or mental disability, genetic information, or any other characteristics protected by federal, state, or local law.

We protect employee information.

If you have access to information about your fellow employees, don't reveal it to anyone except when necessary for legitimate business purposes. Confidential employee information includes information collected by Blue Cross NC as your employer, including but not limited to birth dates, addresses, Social Security Numbers, employment information, veteran/disability status, and information voluntarily provided for self-identification purposes such as sexual orientation and gender identity.

This is not intended to preclude or dissuade employees from discussing wages, benefits or the terms or conditions of employment.

Our Commitment to Each Other

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We are committed to providing a safe and nonthreatening workplace.

It is up to each Blue Cross NC employee to ensure we meet our commitment to high standards of safety and employee protection.

You may not bring weapons on Company property or at other locations when conducting Company business. We do not tolerate abusive language, disorderly conduct or violence or threats of violence toward people or Company property. If you have an immediate concern for your own safety or that of anyone else, please contact Security. For additional information, see our [Workplace Violence policy](#).

We maintain a workplace free of substance use.

Being under the influence of illegal substances or alcohol while performing your job duties poses a serious threat to your health and safety, to the productivity of our organization and to the well-being of all outside stakeholders of Blue Cross NC. Human Resources is responsible for support of our [Substance Use in the Workplace policy](#) which prohibits:

- The use, possession or distribution of any illegal substance, as well as the abuse of legal drugs or alcohol, on Company property or while conducting Company business.

If you believe you have a problem with drugs or alcohol, please see our [Employee Assistance Program policy](#) for additional information.

Our Commitment to Our Customers and Business Associates

Blue Cross NC Code of Conduct

We deal fairly with our colleagues and customers and with others with whom we have a business relationship – and we respect the value of information shared with us. Blue Cross NC strongly supports vigorous but fair competition. We understand that anticompetitive – or antitrust – laws keep the marketplace thriving. We only make factual claims about our services. Employees must comply with all applicable laws and regulations when conducting business on behalf of Blue Cross NC.

Customer commitment

We seek to develop lifetime relationships with our customers and their families.

We treat our customers honestly, fairly and courteously and attempt in good faith to determine and satisfy their needs. We accurately represent the benefits, pricing and quality of our products and do not misrepresent those characteristics of our competitors' products.

Privacy of information: We access our customers' information only to the extent required by business needs.

As part of your job, you may have access to our customers' personal information. It's important that each of us lives up to the trust that our customers place in us. You may only access the minimum necessary personal information to do your job and must not share confidential information with anyone – even a co-worker – who does not need to know that information. Our customers' personal information must not be accessed, used or disclosed, except as permitted by the [Blue Cross NC Corporate Privacy policies](#).

Connecting with our Values

Every Customer Matters: We build our customers' trust in us when we actively listen to their concerns and meet their needs. We provide our customers with peace of mind when we respect and protect their confidential information.

Show Grit: We tell our customers and business associates what we are going to do, and then we do it. Our customers and business associates judge us by our actions. We build lasting and valuable business relationships when we live up to our standards.

Marketing and sales practices

We deal fairly with vendors who purchase health insurance coverage from us.

We hope that our vendors will purchase health care coverage from us. Blue Cross NC may purchase from vendors who also buy health care coverage from us, provided their prices or bids are competitive with vendors who do not purchase our products. We will not require a vendor to buy our products as a condition to becoming or continuing to be a Blue Cross NC vendor.

Our Commitment to Our Customers and Business Associates

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We respect fair and free markets.

We will not take any actions that may constitute unlawful competition, including working with (or attempting to work with) competitors to set prices for products or services and agreements which artificially raise the prices of our services, divide customers or territories or boycott another party.

We are aware of how our dealings with competitors may be perceived.

When preparing for and attending any meeting at which competitors will be present, you must be careful not to share confidential information or create the perception that you are doing so.

Before any such meeting, consider the following:

- Review the agenda in advance of the meeting, with an eye toward topics with anticompetitive implications such as “marketing practices” or “pricing”
- Consider anticompetitive risks in attending informal meetings at or around the time of the regular meeting
- Encourage participants to stick to the business on the agenda and avoid discussions of sensitive topics not on the agenda
- When discussing insurance industry matters, avoid discussing Company-specific information
- Review the minutes after the meeting to ensure they accurately report the actions taken at the meeting
- If you need guidance regarding exchanging information with competitors, you can consult the [Antitrust Policy](#) or contact a member of the [Legal](#) or [Ethics Teams](#)

We will not pay or accept any improper payments.

You may not pay or accept a bribe, kickback or any other improper payment to/from any person or entity. When engaging with third parties who may be located offshore, you should be mindful of the antibribery provisions of the Foreign Corrupt Practices Act. These regulations prohibit any U.S. person or company from making corrupt payments (either directly or through a third party) to foreign officials in order to obtain or retain business. If you have reason to believe that any workforce member or third party is engaging in these types of practices, you should promptly report the issue to the Legal Department.

We respect the value of corporate information and will not engage in insider trading.

During your employment with Blue Cross NC, you may become aware of confidential or proprietary information about other companies, including publicly traded companies and companies about to go public, that has not been made public. If you receive any non-public or “inside” information about a company, you may not use that information in any way for personal gain. Specifically, you may not use material, non-public information to buy or sell securities in that company. In addition, you should not disclose such information to anyone, including family members, friends or advisors unless properly authorized by that company.

We hold our agents and consultants to a high standard.

When representing Blue Cross NC, our agents and consultants must adhere to the standards set forth in the Code of Conduct. Agreements with agents, brokers and consultants must be in writing on the Company’s standard forms or other forms approved

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by the Legal Department and must clearly and accurately set forth the services to be performed, the basis for earning any commission or fee and the applicable rate or fee. Blue Cross NC-commissioned agents, consultants and other third parties are prohibited from making any payment on behalf of the Company that would be improper when made by a Company employee.

Vendor considerations

We work with vendors who offer us the best value in terms of quality and price.

We weigh all the facts impartially and objectively when selecting among competing suppliers. We select the vendor that will best serve our Company's needs and interests, without regard to any personal relationships or personal interests.

We work with third parties who share our values.

We seek out vendors that share our values and ethical standards. We treat them honestly, fairly and courteously. We will not knowingly do business with business associates, vendors, suppliers or contractors who use child or forced labor or engage in human trafficking. If you have reason to believe that any third party is engaging in these types of practices, you should promptly report the issue to the Legal Department.

Obtain a written exception from management and the Ethics Team to serve as a supplier to Blue Cross NC.

Generally, you may not be a supplier to Blue Cross NC. "Supplier" includes persons or companies who represent a Blue Cross NC supplier, work for or provide services to a Blue Cross NC supplier or have a significant interest in a Blue Cross NC supplier. Management may, in consultation with the Ethics Team, approve exceptions to this policy when it is

in Blue Cross NC's best interest to procure goods or services from you or from a supplier with whom you are closely connected, such as a close friend or family member. However, you cannot be your own approving authority under any circumstances or participate in decisions to use a close friend or family member as a vendor. As with any vendor selection, Blue Cross NC will select vendors objectively and fairly in the best interests of the Company.

We avoid even the appearance of a conflict of interest in soliciting any type of sponsorship from our vendors.

From time to time, Blue Cross NC may choose to seek sponsorship from vendors to support educational or collaborative events. When engaging with vendors in this manner, Blue Cross NC will follow strict guidelines to ensure its integrity and public image are protected and will avoid even the appearance of a conflict of interest. Corporate Services and the Ethics Team have the sole authority and discretion in approving a sponsorship request.

Conflict of interest

Our commitment to avoiding conflicts of interest.

We prohibit even the appearance of a conflict of interest. Blue Cross NC respects the rights of its employees to manage their affairs and investments and recognizes that you may take part in financial, business and other activities outside your job. However, all employees have a duty of loyalty to make decisions and conduct themselves in a manner that is in the Company's best interest as a responsible corporate citizen.

Our Commitment to Our Customers and Business Associates

Blue Cross NC Code of Conduct

A conflict of interest occurs when you have a personal interest that interferes with your Blue Cross NC responsibilities or affects your ability to act in the best interest of Blue Cross NC and its customers. Because conflicts of interest can undermine our Company's success and its reputation, we manage our business relationships with our responsibility toward Blue Cross NC in mind, avoiding even the appearance of a conflict of interest.

Members of the Board, Company executives and all employees must disclose conflicts of interest in writing at least annually. All employees are expected to report potential conflicts of interest which may arise from time to time. However, it is not always easy to determine whether a situation could create a conflict of interest.

Some of the more common situations that could lead to problems are listed on the following pages, and you can consult the [Conflict of Interest policy](#) for further guidance. Clinically licensed personnel can also consult the [Medical Personnel Conflict of Interest policy](#) for specific guidance around outside clinical activities.

Outside activities:

Avoid activities or relationships that may affect your objectivity or your ability to perform your job.

Blue Cross NC is proud of our many employees who are active within the communities we serve. However, a conflict of interest may exist when you or a member of your family is involved in an activity that could affect your objectivity in making decisions as a Blue Cross NC employee, interfere with your ability to do your job or harm Blue Cross NC's reputation.

Such activities may include directive, supervisory or consultative services; outside employment; or civic or charitable affairs, and must be disclosed. For additional information please see the [Ethics Guide for Managers on Avoiding Conflicts of Interest – Outside Activities](#).

Connecting with our Values

People First: We can have an impact on our communities. When engaged in activities outside of work, look for opportunities to be an ambassador to help others understand how to improve their health.

Every Customer Matters: When engaged in outside activities, good practice requires you to avoid even the perception that your activities compromise your ability to do your job or impact Blue Cross NC's reputation or standing in the community. Ask yourself: Am I doing what is right for the Company?

Our Commitment to Our Customers and Business Associates

Blue Cross NC Code of Conduct

Ensure outside employment doesn't create conflicts of interest and/or commitment.

The Company respects each employee's right to engage in activities outside of their employment at Blue Cross NC. However, as an employee of Blue Cross NC, your primary employment obligation is to the Company. Any activities such as working a second job (including as an employee, contractor, or independent consultant), or operating a personal business must not create a conflict of interest or conflict with your duties and obligations to Blue Cross NC. You may not use Company time, name or logos, influence, assets, facilities, materials, or the services of other Blue Cross NC employees for or in connection with any outside employment. For more information, see the Blue Cross NC [Employee Handbook](#) and the [Conflict of Interest Policy](#).

Engage in political activities only on personal time.

While the Company encourages us all to take part in the political process, you may do so only during non-work time and as individuals, not as representatives of Blue Cross NC unless your job responsibilities specifically require you to engage in the political process (for example, you are a member of the Government Affairs Team). It is against Company policy and may be illegal to:

- Include, directly or indirectly, any personal political contributions on your expense account or in any other way cause the Company to reimburse you for that expense
- Use Company property or facilities or the work time of Company employees for any political activity, unless your job responsibilities specifically involve such activity (e.g., Government Affairs)
- Use Company funds to make political contributions

The Company does have an employee Political Action Committee (BluePAC). It is the only Company-sponsored means by which employees may make voluntary contributions to candidate campaign committees.

The Company also encourages all employees to fulfill their civic responsibilities and to vote in all public elections, whether local, state or national. Most employees' schedules provide sufficient time to vote either before or after working hours. In the event an employee's schedule does not provide sufficient time off to vote, the employee may request time away to fulfill their civic responsibility.

Relationships in the workplace can create a conflict of interest.

Family, romantic or close personal relationships that may adversely influence decision-making, actions or activities at work may create a conflict of interest. Even if you are careful and work to remain objective, your relationship with this individual can create the appearance of a conflict of interest. In particular, employees must avoid a direct or indirect reporting or supervisory relationship with any member of their immediate or extended family (or others with whom they have a romantic or close personal relationship). If such a relationship exists or occurs, you must report it to the Ethics Team.

Our Commitment to Our Customers and Business Associates

Blue Cross NC Code of Conduct

Financial interests

Working for a Blue Cross NC business associate or competitor.

If you enter into any kind of employment, business or consulting relationship with any company that has (or is reasonably likely to have) a business relationship with Blue Cross NC, or if a family member enters into any such relationship and you are in a position to influence decision-making on behalf of Blue Cross NC regarding that organization, you must disclose this relationship to the Ethics Team. This does not mean that family members cannot work for one of Blue Cross NC's vendors or competitors; rather, we want to ensure that Blue Cross NC employees avoid conducting Blue Cross NC business with their families – or others with whom they have a significant personal relationship – unless they have properly disclosed that relationship.

Financial interests in Blue Cross NC's business associates or competitors

You or an immediate family member may find yourself in a position to take a financial interest in a company that is (or is reasonably likely to be) a Blue Cross NC vendor or competitor. You and your immediate family members must avoid any situation in which your personal financial interest would be in conflict with your responsibilities to Blue Cross NC. Examples of financial interests are:

- Stock ownership
- Partnership participation
- Management or employment

- Consulting agreements
- Other contractual arrangements

When considering whether your personal financial interests may create a conflict of interest, consider how Blue Cross NC decisions may affect the value of your financial interest or how your interest in the other entity may affect your decisions at Blue Cross NC.

Examples of potential conflicts include:

- Direct or indirect financial interest (including employment or consultant agreements) in any outside company doing business with or competing against Blue Cross NC
- Direct or indirect competition with Blue Cross NC in buying or selling property or property rights
- Representing Blue Cross NC in any transaction in which you have a material financial interest
- Using your knowledge of Blue Cross NC business for your personal profit or advantage
- Taking personal advantage of an opportunity learned through your employment with Blue Cross NC, such as acquiring property or leases in which Blue Cross NC may be interested

Our Commitment to Our Customers and Business Associates

Blue Cross NC Code of Conduct

Speaking engagements and other third party invitations

Decline compensation for participating in third-party events on behalf of Blue Cross NC.

Upon occasion, a third party may invite you to make a presentation, participate on a panel or focus group, complete a survey, attend a seminar or presentation or participate in other activities related to the work you do for Blue Cross NC. Such a third party may offer to pay you and/or reimburse you for your time or expenses, such as meals, travel and lodging. You may not personally accept payment for your participation.

If your manager decides that it is in Blue Cross NC's best interest for you to participate in the event, the vendor may directly arrange and pay for your travel expenses provided the expenses are a reasonable amount, not lavish, and such vendor-paid trips do not occur frequently. Your manager may also decide that it is in Blue Cross NC's best interests for you to participate at Blue Cross NC's expense or approve reimbursement of your travel expenses by the third party in accordance with Blue Cross NC Employee Expense policies. You may not accept payment directly from the third party.

If your request to participate in a Company-related business activity has been denied, it would not be appropriate for you to engage in that activity on your own personal time if you will or could be perceived to be representing Blue Cross NC. This policy does not apply to occasions when you are asked to speak or participate in activities that are not related to Blue Cross NC business and occur on your personal time.

If you or your manager are not sure whether an invitation or offer would be considered a conflict of interest, ask yourself the following questions:

Connecting with our Values

Every Customer Matters: Dealing fairly with our business associates means we make business decisions based on the merits of their products and services.

We promote successful working relationships and goodwill, but avoid situations where giving or accepting gifts can suggest a conflict of interest or improper attempt to influence business decisions.

- Was I asked to participate in the activity because of my position with Blue Cross NC?
- Is the subject matter of the activity related to my job responsibilities with Blue Cross NC?
- Does the activity interfere (or give the appearance of interfering) with the duties that I perform at Blue Cross NC?
- Will my participation in the activity create the appearance of a conflict of interest or impropriety because of my position with Blue Cross NC?

If you answered "yes" to any of these questions, or if you are not sure whether a particular activity would be considered "related to the work you do for Blue Cross NC," you should consult with a member of the Ethics Team before participating in the activity.

Our Commitment to Our Customers and Business Associates

Blue Cross NC Code of Conduct

If a conflict of interest (or the appearance of one) develops, report it immediately. If you're not sure, ask for guidance.

Unfortunately, it is not possible to list all of the circumstances that may signal potential conflicts of interest. One of the best ways to gauge whether the activity creates a conflict of interest is to ask yourself some questions:

- Does the activity interfere with my ability to exercise objective judgment when making business decisions on behalf of Blue Cross NC?
- Will I use Blue Cross NC assets (e.g., information, time, computer systems, etc.) when preparing for or performing the activity?
- Am I or my family members receiving personal benefits through the activity because of my position at Blue Cross NC?
- Does the activity compete against the interests of Blue Cross NC?

If you answer “yes” to any of these questions, the activity may indeed create a conflict of interest and must be disclosed. If you are not sure, contact the Ethics Team for assistance.

If you believe you are facing a potential conflict of interest, report it to your supervisor and complete a [Conflict of Interest Disclosure Form](#) as soon as you become aware of the potential conflict. If a member of the Board believes they are facing a potential conflict of interest, they must complete and submit an Independence and Conflict of Interest Questionnaire. If you are unsure whether a particular activity or situation is a potential conflict, contact the Ethics Team to discuss the matter. Once a potential conflict is reported, the Ethics Team will determine whether a conflict of interest exists and help you to resolve it.

Gifts and entertainment

We are committed to giving and accepting gifts and entertainment responsibly.

Offering or accepting business favors, gifts and entertainment can build goodwill, but it can also create a conflict of interest (or a perception of a conflict) that can undermine the integrity of these business relationships. Blue Cross NC is committed to ensuring that all gifts and business courtesies, given and received, are appropriate and within the limits of the law and customary business practice. For additional information see the [Ethics Guide for Managers on Avoiding Conflict Concerning Gifts, Favors and Entertainment](#).

“Favors, gifts and entertainment” means anything of value.

It can include meals, lodging, discounts, loans, cash, services, equipment, prizes, products, transportation, use of vehicles or vacation facilities, home improvements, tickets, gift cards or certificates and favorable terms on a product or service. It may also include shirts, hats, door prizes or small promotional items such as coffee mugs, pens, etc. These are just examples – the list of potential favors, gifts and entertainment is impossible to specify in advance.

Never accept a gift if it could influence your business decisions at Blue Cross NC.

No matter what the value of the gift, if it could influence your decision-making or otherwise compromise your ability to act in the best interest of Blue Cross NC, you may not accept a gift for yourself, a family member or anyone else.

Our Commitment to Our Customers and Business Associates

Blue Cross NC Code of Conduct

Acceptance of gifts.

You may accept gifts or other business courtesies provided ALL of the following criteria are met:

- The gift or courtesy is of nominal value (\$100 or less), reasonable and appropriate to the occasion and given on an infrequent basis. (See the special considerations that apply to our government business)
- The gift is not a personal discount that is not widely available to other Blue Cross NC employees
- The gift is not cash or a cash equivalent, such as shares of stock, honorariums, coupons, vouchers, gift cards issued by a bank or other financial institution, etc. Gift certificates and gift cards issued by non-financial third parties are not considered cash equivalents for the purpose of this Code, but are subject to the other limitations on receiving gifts, including the special considerations that apply to our government business
- The gift is not given as part of a business negotiation

Entertainment and meals.

Entertainment and meals offered or received by employees as part of a legitimate business activity are not included in the \$100 limit but must be within reason and not offered as part of a business negotiation or attempt to influence your judgment. The person (or company representative) offering the business meal or entertainment must participate in the activity. If not, the meal/entertainment would be considered a gift and subject to the nominal value requirement. Offers of entertainment exceeding \$1,000 per event must be approved by a member of the Executive Leadership Team prior to accepting such an offer.

Raffles and drawings.

Prizes from raffles and drawings as part of a legitimate business activity (such as a conference) may be accepted if:

- The raffle or drawing is a legitimate giveaway and not an attempt to influence your judgment
- The event is open to the public or to all attendees and your name was chosen at random
- The prize is appropriate to the occasion
- The prize is not cash
- Acceptance of the prize does not place you under any obligation to the company sponsoring the event

Never give a gift if it could inappropriately influence another party.

In general, you must never offer or give a gift or other item of value with the intent to unlawfully influence the objective business judgment of an external party.

You may give gifts, entertainment or other business courtesies provided ALL of the following criteria are met:

- The gift or business courtesy is reasonable, appropriate to the occasion and a customary business practice
- The gift or business courtesy is of nominal value (\$100 or less)
- The gift or business courtesy does not violate any law, regulation or known policy of the recipient
- The gift or business courtesy is not given with the intent to gain unfair business advantage and does not involve improper activity

Our Commitment to Our Customers and Business Associates

Blue Cross NC Code of Conduct

- The gift is appropriate under Company policies, approved by your supervisor and is properly reflected in the books and records of the Company
- The gift is not cash or a cash equivalent, such as shares of stock, honorariums, coupons, vouchers, gift cards issued by a bank or other financial institution, etc. Gift certificates and gift cards issued by non-financial third parties are not considered cash equivalents for the purpose of this Code, but are subject to the other limitations on receiving gifts, including the special considerations that apply to our government business
- You are not an employee involved in the administration of a government contract, unless at an on-site activity. (See the special considerations that apply to our government business)

Note: *Special rules apply to external funding and support of health care improvement activities, which are not governed by these rules. Such support is permissible if, among other requirements, it enhances the quality or decreases the cost of health care for our customers.*

Our Commitment to Protect the Integrity of Company Records, Information and Assets

Blue Cross NC Code of Conduct

We have the responsibility to protect the financial, physical and intellectual property of Blue Cross NC. We will record, prepare and report information completely, accurately and honestly, and we will comply with all applicable laws and regulations (including generally accepted accounting principles).

We protect against fraud, waste and abuse.

Fraud occurs when a person or entity intentionally makes, or causes to be made, any false statement or misrepresentation on a claim, billing, receipt or any other associated materials with intent of making, or causing to be made, unwarranted payment in whole or in part.

Examples of health care fraud include:

- Intentional misrepresentation of personal information used during a medical benefit enrollment process
 - Intentionally misrepresenting a medical condition for the purposes of obtaining a prescription
 - Identity theft, theft of services, forgery and/or check washing
 - A sales agent intentionally misrepresenting benefit information to induce a beneficiary to enroll in a health plan
 - Falsification of an ICD-10 code for the purposes of inflating a Hierarchical Condition Category (HCC) or to drive a higher Diagnosis Related Group (DRG)
 - Falsifying a Certificate of Medical Necessity (CMN) in order to gain prior authorization for Home Health Care
- Intentional misuse of modifier 25 to falsely indicate that a separately identifiable service has taken place
 - Intentionally ordering/providing unnecessary services and/or goods such as durable medical equipment (DME), lab tests and pharmaceuticals
 - Intentionally “upcoding” an evaluation and management (E&M) code
 - Falsifying start and stop times for telehealth or behavioral health counseling

Connecting with our Values

People First: We deal with important information every day. We must ensure we accurately record and preserve that information in order to deal fairly and truthfully with our customers and business associates.

Every Customer Matters: Our customers expect us to pay their claims accurately the first time. We achieve this goal and make it easier for our customers and business associates to work with us when we maintain accurate records.

Our Commitment to Protect the Integrity of Company Records, Information and Assets

Blue Cross NC Code of Conduct

Waste includes practices that, directly or indirectly, result in unnecessary costs, such as overusing services. Waste is generally not considered to be caused by criminally negligent actions but rather by the misuse of resources.

A classic example of waste that impacts the entire health care ecosystem:

- A provider opening a 10mg single use vial of a drug for a treatment requiring only 5mg, which results in wasting 5mg of the drug. In this instance, having a stock of 5mg vials on hand would reduce health care waste.

It does not stop there:

- The provider then appropriately bills for the 10mg vial, using a JW Modifier to indicate waste. The health plan pays for the entire 10mg vial. This type of waste impacts supply and cost, with potential impact to patient coinsurance.

Abuse is reckless disregard or conduct that goes against, and is inconsistent with, acceptable business and/or medical practices resulting in greater reimbursement or services.

One of the most common examples of abuse centers around the frequently used E&M codes, specifically the Established Patient Visits, 99211-99215.

Sometimes, without ill intent, providers routinely select higher levels of E&M codes when billing, but the services were not provided at that level. An example is a provider billing a 99215, while only a 99213 was appropriate to bill.

This inflates the provider's payment, may result in excessive cost to a self-insured group, may impact a member's coinsurance or Maximum Out-of-Pocket (MOOP) and increases costs through all of health care.

For more information on Blue Cross NC's program to prevent and detect fraud, waste and abuse, visit the [Blue Cross NC Fraud, Waste and Abuse policy](#) and the [SIU intranet website](#).

Integrity of records and information

Accurate and timely records provide the core information critical to the effective management of our business and the fulfillment of our obligations to our members, government bodies and the public. Blue Cross NC relies on all employees to make sure that Company records are true, accurate and complete based on our policies and any applicable contractual, legal and accounting standards.

You must make only truthful and accurate reports, including the time you have worked, your business expenses, your own production or performance data (including records), the production and performance data of the Company and any other business-related activities for which you record and/or report data. We provide comprehensible reports in a timely manner.

You must record all transactions appropriately to facilitate full accounting of all assets and liabilities of the Company and to supply the data needed for the preparation of financial statements. You should only charge an expense to the account, project or budget category for which it was incurred. You may not maintain unrecorded or "off the books" funds or assets.

Our Commitment to Protect the Integrity of Company Records, Information and Assets

Blue Cross NC Code of Conduct

If you are involved in the preparation of the Company's financial statements, you must apply all applicable generally accepted accounting principles and other accounting standards, so that the statements fairly and completely reflect the operations and financial condition of the Company.

Use good judgment when traveling for Blue Cross NC business.

When traveling for Blue Cross NC business, you will be reimbursed for legitimate business-related expenses. All business-related expenses must be reported accurately in accordance with our [Employee Expense policies](#).

We create, retain and dispose of Company records in compliance with our Records Retention policy.

You must retain all documents (including electronic records) in your custody or control in accordance with the [Records Retention policy](#) and must take special care to retain all documents that relate to any imminent or ongoing investigation, lawsuit, audit or examination involving the Company. The destruction or alteration of documents or records in order to impede a governmental investigation, lawsuit, audit or examination may lead to criminal liability. Be familiar with the policies related to management and retention of email and other Company records.

We record financial agreements with business associates in writing.

All agreements with business associates must be in writing in a format approved by the Legal Department. Agreements must clearly and accurately set forth the services to be performed and amount of compensation. Payments under these agreements must be reasonable and in an amount that is appropriate for the value of the services rendered.

We cooperate fully with auditors, government agencies and other investigators.

You must cooperate and respond fully and truthfully to all reasonable requests for information made by Blue Cross NC investigators and auditors, outside auditors and any regulatory agency in connection with an audit, investigation or review of Blue Cross NC records. Employees shall not provide false or misleading information related to any Company audit or investigation.

If any person who claims to be a government contractor contacts you, or if you receive a subpoena or other written request for information, notify a member of the Legal Department immediately before you provide any requested information. The Legal Department will assist in verifying the credentials of the investigator and ensure that you follow proper procedures for cooperating with the investigation.

We promptly disclose errors.

If you discover clerical, accounting or reporting errors, you must correct them promptly. You must also report the error to your supervisor so that appropriate remedial steps may be taken. If the error requires disclosure to a customer, supplier or external authority, you must report the error to a member of the Legal Department for appropriate action.

Our Commitment to Protect the Integrity of Company Records, Information and Assets

Blue Cross NC Code of Conduct

Use of company assets and information systems

We use Blue Cross NC assets responsibly, as if we were paying for them ourselves.

You have a responsibility to use our assets for Company purposes, maintain them with care and guard against waste, misuse and theft. Our assets include not only Blue Cross NC owned facilities and equipment, but also office supplies, information systems, intellectual property, securities and cash. Misuse of these resources can disrupt the vital flow of information or tie up resources on which our customers depend.

Company property should not be sold, loaned, given away or otherwise disposed of, regardless of condition or value, except with proper authorization. You must return all Company property immediately upon request or upon termination of employment.

You are responsible for the judicious and ethical use of Company funds over which you have control. If you spend Company money, or personal money that will be reimbursed, you should always be sure that the Company receives appropriate value in return. You are also responsible for maintaining the appropriate documentation regarding the use of Company funds.

Employee work time is a Blue Cross NC asset, and you must use it wisely.

Our employees, and the work they produce, are our greatest asset. Your time on the job should be used for Blue Cross NC business in accordance with our policies.

Get written approval when you use Company assets for non-Company purposes.

You must obtain proper authorization before you borrow or remove any Blue Cross NC assets, including copies of Company documents, from Company premises. Do not use Company assets to support a personal business or consulting effort, outside fundraising activity, political activity or lobbying without appropriate approval.

Acts of dishonesty against the Company or its customers involving theft, destruction or misappropriation of money, property, office equipment, supplies or any other items of value are prohibited. Falsification, alteration or substitution of records for the purpose of concealing or aiding such acts is also prohibited.

Use our systems in accordance with security policies.

In order to protect our confidential information, the Company has very detailed security policies and procedures that every employee must follow, including, but not limited to, the following key rule: Blue Cross NC employees are prohibited from disabling or circumventing any Company security controls protecting our computer systems, such as passwords, firewalls, encryption and screen-locking mechanisms. Any effort to avoid this rule is a violation of our Code of Conduct.

Our Commitment to Protect the Integrity of Company Records, Information and Assets

Blue Cross NC Code of Conduct

Use email, computers and other communications systems lawfully and professionally.

- You may occasionally make reasonable personal use of Company assets, provided it does not interfere with business use, consume system resources, compromise Blue Cross NC's interests, negatively affect your job performance or that of your co-workers, relate to employment outside of Blue Cross NC or violate any Blue Cross NC policy.
- Be responsible. Do not access, distribute, download or upload material that is prohibited by law or contains sexual content, offensive language, anything that would reflect negatively on Blue Cross NC, or derogatory comments about race, gender, sexual orientation, national origin, age, physical or mental disability, religion or any other protected class.
- Be professional and respectful when utilizing internal communication platforms (e.g., Yammer). Remember that our words and the language we use matter. Opinions should always be shared respectfully. Explicit language and disparaging or disrespectful phrasing or tone are not acceptable and do not represent our Blue Cross NC values.
- You are not entitled to an expectation of privacy with respect to Electronic Communications. Blue Cross NC reserves the right to monitor and access any Electronic Communication System and read, disclose and produce copies of any Electronic Communications at any time, without notice, unless prohibited by law.
- See the [Electronic Communications policy](#) for more information.

Use protected material in accordance with copyrights and licenses

Laws and regulations govern the rights to and protection of our own and others' copyrights, trademarks, patents, trade secrets and other forms of intellectual property. Consult with the Legal Department before accepting, using or sharing property that may fall into this category. For example, don't make or use copies of non-licensed copyrighted material, including software, documentation, graphics, photographs, clip art, animation, movie/video clips, sound and/or music, unless the information is specifically approved or appropriately licensed by Blue Cross NC. You must use third-party software and related information only as permitted by software licenses.

Confidential information

Protect the value of confidential and proprietary business information.

You are entrusted with protecting the Company's confidential and proprietary information. You must access or use Blue Cross NC's confidential and proprietary non-public information only as necessary to conduct Blue Cross NC's business and not for your personal advantage or for non-Blue Cross NC business use. This standard also applies to accepting, using or sharing confidential and proprietary information belonging to another party unless you have specific authorization from that party, as confirmed by our Legal Department, to do so.

Our Commitment to Protect the Integrity of Company Records, Information and Assets

Blue Cross NC Code of Conduct

You may use confidential information only for legitimate Company purposes. Examples of confidential and proprietary business information include:

- Member and group information
- Financial data and projected earnings
- Trends and experience data
- Business forecasts/strategies
- Sales figures
- Planned new projects
- Planned advertising programs
- Planned geographical expansion
- Lists of suppliers
- Wage and salary data
- Capital investment plans
- Provider contracts
- Marketing plans/strategies
- Planned changes in management or Company policies
- Testing data
- Processing methods
- Pricing information

Connecting with our Values

Think Data: Proprietary information is information owned by Blue Cross NC.

We respect the hard work that is required to produce that information and use our best efforts to protect its value.

Basic guidelines for protecting the Company's confidential and proprietary information include:

- If you have access to confidential and proprietary information, discuss it with others in the Company only on a need-to-know basis.
- Do not disclose confidential and proprietary information to an outside person or entity unless you have the authority to do so.
- Do not disclose confidential and proprietary information in social conversations or in normal business dealings with individuals outside of the Company.
- Make sure that you don't discuss confidential and proprietary information in a place where you could be overheard.
- Do not send confidential and proprietary information to your personal email address.

Our Commitment to Protect the Integrity of Company Records, Information and Assets

Blue Cross NC Code of Conduct

Only Speak to the Media on Behalf of Blue Cross NC if Properly Authorized

From time to time, members of the media may contact employees for information about the Company, our employees or those with whom we do business. Do not provide Company information in response to these requests. Report the inquiry to your supervisor and refer the media representative to the Blue Cross NC Corporate Communications department. Employees should never represent that they are speaking for the Company in any capacity unless specifically authorized by the Corporate Communications department to do so. See the [Media Relations policy](#) for more information.

Be Sensitive to Confidentiality Concerns if a Family Member Works in the Health Care Industry

If a business associate or competitor of the Company employs your spouse or someone with whom you have a close relationship, such as a close friend or family member, you must be sensitive to confidentiality concerns. The closeness of the relationship could lead you to compromise the Company's interests, such as by accidentally disclosing sensitive Company information. Such situations call for extra sensitivity to security, confidentiality and conflicts of interest.

There are several factors to consider in assessing a situation in which someone close to you works for a business associate or competitor. Among them are:

- The relationship between Blue Cross NC and the other company
- The nature of your responsibilities as a Blue Cross NC employee and those of the person close to you to their company
- The access each of you has to your respective employer's confidential and proprietary information

If in doubt, discuss your specific situation with your manager and a member of the Ethics Team to assess the nature and extent of any conflict of interest and how it can be resolved. You must disclose any instances in which a member of your immediate family or household or someone close to you works for a business associate or competitor in the annual [Conflict of Interest Disclosure Statement](#).

Our Commitment to Our Government Relationships

Blue Cross NC Code of Conduct

We follow the rules about gratuities, compliance and other business relationships that affect the government programs we administer.

Here are some things you need to know about our responsibilities when interacting with government officials and when administering government programs such as Federal Employee Program® (FEP), Medicare, Medicaid and the State Health Plan.

We follow the rules regarding employment of government personnel.

There are laws and regulations that govern the recruiting and hiring of government personnel. These rules apply to personnel hired by the Company as well as Blue Cross NC's agents, contractors and consultants. We do not hire or contract with an individual or entity excluded by the government from participating in government programs unless there is a limited exception to the government's rules. Before discussing possible employment of a government employee with Blue Cross NC, consult with [Human Resources](#).

We are careful with confidential information when seeking to contract with the government.

We ensure the integrity of the contracting process by avoiding discussions of bids or proposals with competitors or potential competitors. You must not seek to obtain from government contractors – and may not use – any proprietary or confidential information regarding the contract process before the award of the contract.

Connecting with our Values

Every Customer Matters: Working with the government demands close attention to accurate record keeping. We recognize that we are entrusted with the oversight of taxpayers' money and our obligation to ensure Blue Cross NC truthfully represents all aspects of its involvement in government programs.

You must also not use information prepared for internal use by the government when evaluating a bid or proposal to enter into a contract.

You may never pay a contingent fee to any person or company to solicit or obtain government contracts, or for the purpose of influencing or attempting to influence a government employee in connection with the award or modification of any government contract.

Our Commitment to Our Government Relationships

Blue Cross NC Code of Conduct

We follow applicable regulations when submitting proposals, budgets and other reports and records to the government.

Proposals, budgets and other important reports and records that Blue Cross NC furnishes to the government must meet significant record keeping and other obligations. You must prepare complete and accurate records when submitting documentation to the government.

If you work on, process claims for or file reports for government programs, you need to be aware of the federal **False Claims Act (FCA)**. The FCA enables the federal government to seek significant damages and penalties against health care providers (including insurers and third-party payers) who knowingly submit false or fraudulent claims to Medicare, Medicaid or other federal health care programs.

We are careful when reporting costs to the government.

We report costs and enter time reports that are timely, accurate and complete. For direct-charge work, only work that is actually performed on that government contract may be charged to that contract. Similarly, indirect charges must be proper and accurate. In addition, no cost may be charged or allocated to a government contract if it is unallowable or inapplicable by law, regulation or contract provision, or if it is otherwise improperly claimed. Employees' and managers' signatures or electronic authentication of time sheets are examples of reports that are used by the Company to bill its services to the government and must be completed honestly and accurately.

We do not accept gifts or business entertainment from government representatives.

If you work on government programs, you may not accept gifts – monetary or non-monetary – from government officials, vendors, suppliers or members of the programs. To avoid potential violations of federal or state anti-kickback statutes, you must never request or receive anything of value from a vendor, supplier, provider, member or beneficiary in return for payment under a government program or preferred treatment by the government.

If you are working on a federal government contract, you should not accept any business courtesies (e.g., coffee, soft drinks, etc.) worth more than \$20 per person per occasion or more than \$50 from one source per year. [Click here](#) for more information about the policies regarding accepting gifts from state government employees.

Generally, we do not offer gifts or business entertainment to government employees.

There are specific laws and regulations that apply to offering gifts to government officials or employees. When working with employees of a North Carolina state governmental agency, you may not give any gifts or favors to that employee. However, if working with a federal government employee or prime contractor, you may offer on-site nominal business courtesies. Examples are coffee, soft drinks or other light refreshments. Such courtesies may not exceed \$20 per person per occasion, and the annual value of items offered may not exceed \$50 per person. [Click here](#) for more information about the policies regarding gifts which may be offered to state government employees.

What Should I Do?

Blue Cross NC Code of Conduct

Decision-making

How do I know if I'm doing something that may be unethical or may violate our Code of Conduct?

Ask yourself the following questions:

- Is my action legal?
- Does my action align with Blue Cross NC Values?
- Is my action in compliance with Blue Cross NC policies?
- Is my action honest?
- Will my action appear inappropriate to others?
- Would I be proud to tell my co-workers or family about my action?
- Would I like to see my action on the news?

If you answered “no” to any of these questions, seek guidance from your manager before taking any actions. You can also contact the Ethics Team.

Good faith reports

What is a “good faith” report?

If you have a reasonable belief that the report you are making relates to possible employee misconduct, you are making a “good faith” report even if your allegations turn out to be untrue.

Response to reports

I made a report to the Ethics Hotline and nothing happened. Why should I make reports in the future or encourage my co-workers to report?

All reports received by the Ethics Team are taken seriously. We understand that sometimes a resolution may not be immediately obvious and employees may worry their concern has not been addressed.

There are several reasons it may appear nothing happened after your report. 1) If you made an anonymous report, there may not have been enough information to conduct a thorough investigation; 2) the investigation did not find enough evidence to substantiate the allegation; or 3) corrective action was taken but information related to disciplinary action is considered confidential and may not be shared.

While we aren't always able to share the details with all parties involved, we work very hard, often behind the scenes, to deliver a fair and thoughtful resolution. If you have questions about a report you made, contact the Ethics Team.

False accusations

I'm concerned that a disgruntled employee who reports to me could make false accusations that I have violated the Code. Will the Company take disciplinary action against the employee for doing this?

If an employee merely reports suspicions that prove to be unfounded, disciplinary action would not be appropriate. All employees are expected to identify and report any concerns they may have, without fear of retaliation. However, if someone knowingly or maliciously makes a false accusation concerning violations of the Code, that person may be subject to disciplinary action.

What Should I Do?

Blue Cross NC Code of Conduct

Falsification/accuracy of records

You're part of a team working on a project status report that will be used by senior management to make key strategic decisions. You think that the current draft of the report does not accurately reflect the status. You think the team is trying to make things look better than they are.

You have a responsibility to speak up. You should first talk to a member of your management team. Good teamwork requires that we work with our colleagues to ensure quality outcomes. If that is not possible, our commitment to work with integrity still requires that we tell the truth and report concerns. Talk to a member of the Ethics Team or Human Resources (HR).

Year end performance discussion

I disagreed with my manager's assessment of my performance. Who should I talk to?

We encourage employees to follow our [Issue Resolution policy](#). If you don't think your work is evaluated fairly, you should talk with your manager about your review. If you can't reach a solution with your manager, consider talking with your manager's manager. If you call the Ethics Hotline, we will be happy to speak with you; however, the Ethics Team is unlikely to be able to judge the merit of your concern. We encourage you to talk with your management group.

Favoritism

My manager seems to have a "favorite" employee. She gives my co-worker all the best projects that I'd really like the opportunity to work on. Who should I talk to?

Being committed to and passionate about our work requires us to have the courage to identify problems and to create solutions. If you feel your manager is engaging in favoritism, you should talk with them about the situation. If there are projects you'd like to work on, be sure that your manager knows about your interest. We each have a responsibility to improve ourselves professionally and identify opportunities for professional growth. Your manager has an obligation to encourage good teamwork by listening to your concerns and helping you resolve them.

If you're not sure how to begin the conversation, talk with your Employee Relations Advisor for some pointers.

If you believe your manager is discriminating against you due to your age, race or any other personal characteristic protected by our anti-discrimination policy, by law you should report the situation to your manager's manager, Employee Relations Advisor or to a member of the Ethics Team.

Employee personal information

You're planning to invite everyone in your department to a baby shower for another co-worker. The shower will be outside the office on a Saturday, and you'd like to send invitations. Your department administrative assistant has a list of everyone's emergency contact addresses. Would it be okay to ask for that list to help you send invitations?

What Should I Do?

Blue Cross NC Code of Conduct

No, your co-workers have entrusted Blue Cross NC with that information for business purposes only. It would not be appropriate for your administrative assistant to share that information for personal use.

Sexual comments

My co-worker often makes comments and jokes of a sexual nature that make me very uncomfortable. I've asked them to stop, but they continue this behavior. What should I do?

The Company's policy on harassment prohibits sexual harassment, regardless of gender identity. If you feel you are being harassed, you should report it to your manager immediately. If the situation is not resolved or you do not feel comfortable going to your manager, you should report it to your Employee Relations Advisor or call the Ethics Hotline.

Customer information

One of my co-workers is working on a claim for a well known member of our community. At lunch, my co-worker shared some of the details of the customer's file with our lunch group. Is this acceptable?

No. Customer information is confidential and you must never access or use it for anything other than business reasons. You should talk with your manager about what happened so they can take appropriate steps to address the situation.

Socializing with competitors

Over the years I have established good relationships with the account executives and senior management of many of our competitors. We often socialize together at conferences and social events and catch up regarding trends in the market. Should I be concerned about these interactions?

Yes, you should be mindful of these interactions. The risk of discussing prohibited topics with competitors typically arises at trade or professional meetings or seminars. Regardless of whether you're in a business or social setting, you should not discuss prices, pricing policies, costs, financial data, other terms or conditions of our transactions with customers and providers, or any other competitive information with a competitor.

If a competitor begins to discuss these prohibited topics, excuse yourself and leave the meeting immediately. If the discussion occurs during a formal meeting in which minutes are being taken, ask that the minutes reflect your objection to the discussion and the fact that you left the meeting before such discussion proceeded. Immediately notify the Ethics or Legal Team about the incident.

Gifts

I received a basket of fruit and candies from a provider. Do I have to send it back?

If you receive perishable items, such as gift baskets containing food, that are valued at more than nominal value, tell your supervisor about the gift and share it with others in your business area.

What Should I Do?

Blue Cross NC Code of Conduct

Raffle prizes

I attended a conference where all attendees were entered into a prize drawing for an iPod. The prize itself was sponsored by a vendor who works with Blue Cross NC. My name was drawn as the prize winner. Can I accept the prize?

You may accept the prize as long as everyone had an equal chance to win; it was not offered only to Blue Cross NC employees; the prize is not redeemable for cash; and you have no obligation to the vendor. You are responsible for investigating any personal tax implications. Remember that you must always represent Blue Cross NC's interests. Be sure that the prize is truly random, and that you are not "winning" merely because you represent Blue Cross NC.

Vendor offers: Meals

One of our vendors has asked to take a group of employees out to lunch. Can we go?

Provided the lunch is reasonably priced (typically less than \$20 per employee), you may accept the lunch offer.

Vendor offers: Entertainment

A vendor has offered me tickets to a Carolina Panthers game. Can I accept the tickets?

If the vendor will be attending the game, you may accept the tickets subject to the limitations on entertainment. However, if the vendor will not be attending the game, the tickets would be considered a gift and subject to the \$100 limit.

Vendor offers: Conference and travel

A vendor has offered to pay for my airfare, hotel and registration fee for an upcoming conference. The same offer has been made to other attendees. Is it okay for me to accept the offer?

You should consider whether the event is: A business benefit to Blue Cross NC; a reasonable extension of a business relationship; and not intended to "purchase influence" over you. In addition, the expenses paid for by the vendor must be a reasonable amount, not lavish, and such vendor-paid trips must not occur frequently. The vendor should also arrange for payment of the fees directly (i.e., the vendor cannot pay you). Your manager must also approve your participation.

If you are not sure whether a particular activity satisfies these criteria, consult with a member of the Ethics Team before participating in the activity.

Conference invitation

I have been asked to speak at a conference about the work I do at Blue Cross NC. May I accept an honorarium or other fee for my participation?

No, you may not accept compensation for such participation. You must decline the award. If an honorarium is paid directly to you, you must return it to the sender promptly with a letter declining the award. You must also send a copy of the letter declining the award to the Ethics Team.

What Should I Do?

Blue Cross NC Code of Conduct

Outside boards

I've been invited to serve on the board of directors of a nonprofit to which Blue Cross NC donates money. Is that okay?

It depends. Contact the Ethics Team to discuss the details of the opportunity. We will work with you to ensure there is no actual or perceived conflict of interest.

Part-time outside jobs

I'd like to pick up a part-time job to make a little extra money for the holidays. What should I think about when accepting work outside Blue Cross NC?

First, you cannot accept any outside employment that would conflict with the hours you are expected to be at work for Blue Cross NC. You may not use Blue Cross NC assets (including communication systems) to conduct your part-time work.

If you are thinking about taking a position with a Blue Cross NC competitor or anyone else with whom Blue Cross NC has a business relationship, you must disclose that relationship to the Ethics Team. We will work with you to ensure your outside employment does not conflict with your Blue Cross NC responsibilities.

Vendor ownership

I have the opportunity to purchase a 20% ownership share in one of our vendors. Is this a problem?

It could be a problem. Contact the Ethics Team to discuss the details of the opportunity. We will work with you to ensure there is no actual or perceived conflict of interest.

Purchasing competitor stock

My advisor has suggested that I buy a small amount of stock in a large insurance company that competes with Blue Cross NC. Can I purchase the stock?

Provided the stock does not represent a significant financial interest (more than 1% of the outstanding securities/capital value of the company or more than 5% of your own total assets) and does not otherwise compromise your ability to make objective business decisions, purchasing the stock is probably not a problem. Contact the Ethics Team if you have questions.

Inside information

I am working on a contract with a publicly traded vendor which will double the vendor's revenue. Negotiations have been "top secret" and not released to the public. I'd like to buy stock in this company, as I'm sure the value will go up once we sign the contract. Is this a problem?

Yes, that is a problem. You must not use such material, non-public information, for your personal benefit or as a factor in determining whether or not to trade in a company's stock. In fact, it may violate the law to use inside information when trading in stocks or other securities or to provide inside information to someone else that may use it to make decisions about buying or selling stock. No Blue Cross NC employee may buy or sell stock, bonds, options or other securities based on inside information.

What Should I Do?

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Confidential/proprietary information

A broker has given me some documents related to one of our competitors. Although not marked “confidential,” the documents contain information that I know has not been made public. For example, the documents state our competitor’s earnings estimates and describe products they are about to take to market. I could definitely use this information to help me when selling our own products. What should I do?

Dealing fairly with our competitors means you MAY NOT use the materials given to you by the broker unless you know for a fact that the material has been publicly released. If you receive competitor information that is designated as confidential or proprietary, or which you reasonably know to be confidential or proprietary, do not continue to read or review the material. You must return or destroy the document immediately. You must document your taking these steps and report this matter to the Ethics or Legal Team. If you were to use the information offered by the broker, Blue Cross NC and you could be liable for the broker’s violation of its fiduciary duty to its customer and/or violating the antitrust laws.

Reporting errors

The Chief Financial Officer (CFO) has to sign a certification for a financial report to a regulatory agency. I provided some information for this report, and I discovered an error after it had been filed. What should I do?

You should immediately discuss your mistake with the CFO so that the error can be corrected.

Employees involved in the preparation of information covered by a government certification are responsible for the accuracy and completeness of that information. The CFO, as well as you and the Company, may have direct liability for any false statements made, including civil and criminal sanctions.

Accuracy of records

We have a lot of open positions in our department and have been late in responding to customer inquiries. We are required to report our processing times and inventories on a monthly basis. My manager has instructed me to exclude from my report any inquiries over 45 days. This is contrary to Company policy. What should I do?

No one, regardless of position or status in the Company, has the authority to direct you to submit a false or misleading report or otherwise violate the law or Company policies. You should immediately report this incident to your manager’s supervisor or the Ethics Team.

Use of Company email

I operate a small side business from home. Both my manager and the Ethics Team have determined that the business does not represent a conflict of interest with my Blue Cross NC work. Is it okay for me to use Blue Cross NC email to communicate with my customers?

No. Even though there is no conflict of interest, you have an obligation to use Blue Cross NC assets (including the email and voicemail systems) only for Blue Cross NC business. You may not use these assets to support a second job, self-employment venture or consulting effort.

What Should I Do?

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Copyrighted information

I found some great graphics online that I'd like to incorporate into a report I'm preparing for an upcoming Blue Cross Blue Shield Association (BCBSA) conference. Is this a problem?

It could be a problem. Remember that it may not always be apparent on the surface whether property is protected. If you're not sure whether the material is copyrighted, you should talk to a member of the Legal Department before incorporating it into your report.

Software licenses

I know the Company is trying to save money, so I have some software at home I can copy and install on my work computer. Is that okay?

No. While we appreciate your being thoughtful about cost savings, software is protected under U.S. copyright laws, and duplication of copyrighted software is a violation of U.S. law and Blue Cross NC policy. In addition, installing software that has not been approved by Enterprise Security can potentially compromise our data. If you need a particular software program to perform your job, speak with your manager and submit a request to the IT Service Desk.

Disciplining employees for making reports

I think one of my employees made an anonymous report to Ethics about things going on in my team. The investigation into the concern was distracting and embarrassing, and it turned out the employee was mistaken. Can I discipline the employee?

No. If the employee made a report in good faith – even if the allegations turned out to be wrong – you cannot retaliate in any way. On the other hand, if you believe the employee knew the allegations to be false, that may be a separate issue, which you should report (rather than handling yourself).

Purchasing cards

I have a purchasing card I use to buy items for my department. I'm currently struggling with some of my bills. Can I use the purchasing card to buy things like gas and meals, since I need those things in order to do my job?

No. The purchasing card may not be used for personal expenses. Doing so would be a misuse of Company assets and subject to termination. If you need help paying for necessities due to an unexpected event, check out the [Blue Assist](#) page to see if you would be eligible for assistance.

Giving PROPS to family members

My sister works in another area. She does not have many PROPS and would really like to get something from the online catalog. Can I give all of my quarterly PROPS to her?

No. This could be a conflict of interest. Because our PROPS have monetary value, please exercise good judgement in determining when it is appropriate to recognize other employees with whom you have a personal relationship – like a spouse, family member or close friend. In those cases, if you want to recognize a relative or close friend at work, utilize the High Five option which does not attach a dollar

What Should I Do?

Blue Cross NC Code of Conduct

amount to the recognition. This will allow you to provide recognition while avoiding the appearance of a conflict of interest.

Accessing personal information

I work in an area that can access claims data for reporting purposes. My mother doesn't have access to a computer and has asked me to get copies of her claims for the past year. Can I do this?

No. Although you have your mother's permission, accessing claims for that purpose is not a part of your job duties. You should direct your mother to contact Customer Service.

Because of my role, I am able to access information related to authorizations. I have an upcoming procedure and have not yet heard whether it has been approved. Can I access my own record to check the status of the authorization request?

No. Although the information pertains to you, you may not access PHI for your personal use. Employees may only access PHI to perform tasks which they are assigned under their job duties. If you have questions about your authorization, you can contact Customer Service.

Confidential information

I am applying for/have accepted a position with another company. I have worked at Blue Cross NC for over 10 years and am quite proud of my work here. Can I take some of my work products with me to my new company to provide them with examples of my skills? Can I use my work products as a reference for similar work I might be doing at the new company?

No. The work products you developed while

working here are owned by Blue Cross NC. Upon your departure, you must return all Blue Cross NC equipment and records and may not take any confidential information with you.

Political activities

I am interested in volunteering for a political candidate (or political activity). Is that OK?

Yes! Blue Cross NC encourages employees to fully participate in the democratic process. There are just a few things to keep in mind to make sure we protect our Company's reputation and workplace culture.

- When participating in political activities, be clear that any views you express are your own and not those of Blue Cross NC
- Do not conduct the activity on Company time or use Company equipment to support the activity
- Do not use Blue Cross NC logos, letterhead, postage, copiers, phone, fax or email systems for a political candidate or activity
- Do not ask or require Blue Cross NC employees to make a political contribution of any kind to a political candidate or political activity during work hours, via internal company communication channels, or while on Blue Cross NC property
- Do not ask or require any Blue Cross NC employee to assist with political activities
- Do not use a Blue Cross NC return mail or email address or a business telephone number as part of political activities

A Final Note from The Ethics Team

Blue Cross NC Code of Conduct

We believe that if each of us acts in ways that support our Values, we will earn our members' loyalty, maintain our leadership position in our industry and attract and retain a highly talented and engaged workforce. Aligning our actions with our Values will better enable Blue Cross NC to achieve its Purpose. This Code of Conduct is intended to be user-friendly and to provide a clear explanation of how you can support Blue Cross NC's commitment to integrity and a strong business culture. However, we also recognize that one document cannot address every situation that may happen in the course of your workday.

If at any time you're not sure about the right thing to do, the Ethics Team can be a resource to help you make the decision.

Hotline (anonymous)	1-888-486-1554 (toll-free)
Fax	919-765-2006
U.S. Mail	P.O. Box 2291, Durham, NC 27702-2291
The Zone	Code of Conduct Reporting Form

The Blue Cross NC Code of Conduct is meant to be read in conjunction with other Company policies and procedures. Nothing in this Code creates a contract between Blue Cross NC and any employee or between Blue Cross NC and any other person. The Code does not create any legally enforceable rights, nor does it promise specific treatment in certain situations. Unless otherwise stated in a contract or other Blue Cross NC directive, the Code does not modify your at-will employment relationship or contractual relationship with Blue Cross NC.

Blue Cross NC reserves the right to modify the Code at any time it deems appropriate. The most current version is always available on the intranet.

Revision Date/Content Revised

Blue Cross NC Code of Conduct

October 2014

Added gender identity as a protected class.

February 2018

Reviewed Code to ensure statements comply with applicable regulations. Edited Code to reflect new leadership letters and additional/revised examples.

August 2018

Revised Code to reflect updated Vision and Values.

February 2020

Revised Code to include new leadership letter, added criteria to acceptance of gifts, expanded the section addressing commitment to our customers and business associates and added requirement for executives and Trustees to report significant events.

February 2021

Revised Code to include new leadership letter and Purpose statement, added approval requirement for offers of entertainment exceeding \$1,000, clarified that reports of noncompliance may be made to CCO and updated FAQ section.

February 2022

Revised Code to address reportable events, added ethnicity as a protected characteristic, added expectations around respectful behavior and communications, and added a reference to the Investment Committee in the Special Considerations for Trustees.

February 2023

Revised Code to add gender expression and marital status as protected characteristics, updated examples of fraud and definitions of waste and abuse, and updated FAQ section.

February 2024

Revised Code to address outside employment, updated examples of fraud, waste and abuse (FWA) and moved the FWA language to the section on Integrity of Company Records, updated the titles and functions of the Board committees in the Special Considerations for Trustees and updated the FAQ section.

February 2025

Revised Code to apply to the CuraCor Solutions Corp. Board of Directors, reference Corporate Social Responsibility, included reporting responsibilities for company attorneys, revised the list of protected characteristics to align with EEOC law/policy, added additional categories of employee information that is considered confidential, clarified what constitutes outside employment, clarified that employees must avoid a supervisory relationship with family members, and removed the Special Considerations for Trustees section.