# Code of Conduct

Healthfirst

Health Insurance for New Yorkers
TABLE OF CONTENTS

03 A Message from Our CEO

04 Our Mission and Our Culture

05 Purpose and Scope of the Code

06 Our Core Responsibilities
   Individual’s Responsibilities and the Duty to Report
   Leadership Responsibilities
   How to Ask a Question or Raise a Concern
   What Happens When I Make a Report?
   Non-Retaliation and Non-Intimidation

09 Our Workplace
   Advancing Equal Employment Opportunities and a Diverse Workforce
   Promoting a Safe and Respectful Work Environment
   Maintaining Responsible Behavior Regarding Drug and Alcohol Use
   Safety in the Workplace

11 Our Relationships
   Ensuring Confidentiality, Privacy, and Security
   Safeguarding Member Information
   Identifying and Preventing Fraud, Waste, and Abuse
   Deficit Reduction Act of 2005
   False Claims
   Anti-Kickback Statute
   Cooperating with Government Inquiries

15 Our Business
   Avoiding Conflicts of Interest
   Identifying Conflicts of Interest
   Outside Employment or Personal or Business Commitments
   Gifts and Entertainment
   Work Product Ownership
   Company Resources and Business Opportunities
   Fairness in Purchasing and Contracting
   Fair Business Practices and Antitrust Issues
   Protecting Healthfirst’s Assets and Information
   Proprietary Information
   Protecting Intellectual Property
   Proper Use of Healthfirst Funds
   Protecting Our Facilities
   Accurate Financial Reporting and Record Keeping
   Upholding the Company’s Reputation
   Communication
   Media Inquiries
   Electronic Activity and Social Media
   Political Activities
   Our Environmental Impact
   Exclusion Screening/Background Checks

23 List of Policies Referenced in the Code

24 Compliance Program Oversight
A Message from Our CEO

Dear Colleagues,

As you’ve heard me say before, what we do matters; how we do it determines its value. That’s why, as we fulfill our mission to provide our members with quality care and become the preeminent health plan in our market, it is critical that we do so while maintaining the highest standards of integrity, transparency, and ethical business practices.

At Healthfirst, we have a common, clear set of expectations and behaviors called Trailblazer that we as employees are encouraged to follow. Our culture and our values as Trailblazers must be reflected in everything we do, and in all our interactions with our members, hospitals, fellow employees, providers, government officials, and vendors.

Those values are reflected here, in our Code of Conduct, which highlights the principles, policies, and procedures that guide all our business decisions. It is your job to review the Code and understand how it applies to your work—and to ask questions when you are unsure. In order to provide the best value for our members and providers, we must be in full compliance with federal, state, and local laws and regulations. We must also act with integrity and transparency to safeguard the company’s reputation and good standing in the amazingly diverse and wonderful communities where we work and live.

Our shared commitment to ethical business principles directly contributes to our success. I, along with the rest of our leaders, have pledged to uphold the principles set forth in this Code, and we expect you to do the same.

Sincerely,

Pat Wang
Chief Executive Officer
OUR MISSION

Our members are our North Star, and our mission is guided by their needs and preferences in ensuring a superior experience and access to the highest quality healthcare when and where they need it.

OUR CULTURE

Our mission is about people—it’s not just about our members and providers; it’s also about you and the limitless possibilities we can achieve when we work together. That’s why we’ve created common, clear expectations known as Trailblazer. A Trailblazer is someone who lives the Healthfirst culture. To the right are our Leader Compass and Culture Drivers that represent these expectations.

As we fulfill our mission, we work at the highest level of openness, honesty, and integrity. We obey the law and honor our commitments. We value our relationships with our members, colleagues, business partners, vendors, government agencies, and other third parties, and we deal fairly and openly with our competitors. We know that upholding our legal and ethical obligations as a company is critical to our success, but our commitment goes beyond that.

Inspire Through Trust, Lead by Example

Think Critically, Speak Up, Deliver with Pride

Break Down the Walls

Dream Big, Plan Wisely

Be Unstoppable

THE COMPLIANCE HOTLINE

1-877-879-9137 and website www.hfcompliance.ethicspoint.com are available 24 hours a day, 365 days a year.
PURPOSE AND SCOPE OF THE CODE

Purpose
The purpose of the Healthfirst Code of Conduct is to offer you a summary of the most important standards that underlie our fundamental principles and embody our culture as a company. The Code also outlines our obligation to behave ethically, legally, and responsibly in the marketplace and provides guidance to assist you with principled decision-making.

Healthfirst is committed to maintaining the highest standards of ethical business dealings and doesn’t tolerate fraud, waste, abuse, or other inappropriate activities. These standards guide our compliance with state and federal rules and regulations.

As a summary, the Code touches only on the basics, so it is important to ask questions when you are unsure of what to do.

Scope
Compliance is everyone’s responsibility. This Code applies to all Healthfirst employees, Officers, Directors, volunteers, interns, and contractors (“Affected Persons”). Vendors, affiliates and First Tier, Downstream and Related Entities (FDRs) are required to adopt the Healthfirst Code of Conduct or to maintain comparable standards of conduct, policies, and procedures.

All the individuals within this scope have the duty to review and understand the Code and how it applies to all of our current and future lines of business, including, but not limited to, Medicaid, Commercial, Medicare, and Managed Long Term Care products (including the capitated financial alignment product).

It is your responsibility to know, understand, and comply with the requirements of Healthfirst Policies and Procedures, Compliance Plan, Code of Conduct, and applicable laws, even if they are not referenced by name herein. Failure to comply can have serious consequences, including disciplinary action or termination of employment or contract.

THE COMPLIANCE HOTLINE
1-877-879-9137 and website www.hfcompliance.ethicspoint.com are available 24 hours a day, 365 days a year.
Individual’s Responsibilities and the Duty to Report

Every day we make a deliberate decision to conduct business in a lawful and ethical manner that reflects our values and our culture. We expect all individuals to act with integrity, think about their actions, and speak up if they have a concern. When facing a tough situation, consider the following:

- Is it legal?
- Does my action reflect Healthfirst’s core values?
- Does it reflect my responsibilities as a Trailblazer?
- Am I being truthful and honest with everyone involved?
- How might others be affected by the choices I make?
- How would I feel if the situation was reported publicly?
- Have I raised questions and concerns to my supervisor or other company individuals?

If you become aware of actual, suspected, or potential violations of the Code, of Healthfirst policies and procedures, or of federal, state, and local laws, you have an obligation to do the right thing and report your concerns. Healthfirst may have an obligation to report concerns of noncompliance to the applicable governmental oversight agencies, and when necessary, refund overpayments.

Individuals will be subject to sanctions for failure to report suspected non-compliant activity or to participate in a compliance investigation. Disciplinary action will be imposed on those who encourage, direct, facilitate, or permit noncompliant behavior, among other activities. Compliance-related disciplinary actions will be enforced fairly and consistently and will be commensurate with the person’s involvement in the noncompliant activity.

Healthfirst offers several ways to anonymously report suspected misconduct, ask questions, or raise concerns. Your concerns will be taken seriously and promptly reviewed to determine if action is necessary. We do not tolerate retaliation or intimidation by anyone—regardless of their level or position—against an individual who has made a report in good faith or who participates in an internal or external investigation.

Where to Find Healthfirst Policies:

The Code of Conduct references company policies that are listed in the back of this booklet and that can also be found on the company’s Policies and Procedures Sharepoint site, accessible via the Healthfirst intranet. The policies provide additional detail and guidelines regarding expectations for behavior, as set forth in this Code. All Healthfirst policies on the Policies and Procedures Sharepoint site are incorporated in this Code by reference.
Leadership Responsibilities
As leaders at Healthfirst, you are expected to lead by example and inspire through trust. You are responsible for understanding, promoting, and upholding our values, our Healthfirst culture, and our principles by:

- Honoring commitments
- Acting with integrity and setting a positive example through your own ethical behavior
- Letting your employees know that they can come to you with questions and concerns that will be addressed appropriately
- Promptly informing the Compliance Officer of any suspected compliance issues
- Ensuring that individuals making good-faith reports are free from retaliation or intimidation
- Making it clear that an individual who retaliates against or intimidates someone who raises a concern will be subject to disciplinary action, up to and including termination
- Taking immediate action if you become aware of violations of the Code or of applicable laws
- Considering conduct related to the Code when evaluating employees’ performances

How to Ask a Question or Raise a Concern
Compliance goes beyond ensuring that your own actions meet our Code of Conduct and exemplify our culture. It also means that you take action to safeguard the company’s assets and reputation by reporting suspected violations. If you aren’t sure about the right steps to take, contact any of the following:

- Your supervisor or department management
- The Compliance Officer, Jack Hackendorn
- The Human Resources Department
- The Legal Department
- The Compliance Department
- The Compliance Hotline, 1-877-879-9137, and website, www.hfcompliance.ethicspoint.com, are available 24 hours a day, 365 days a year.

See the Reporting Compliance Concerns and Whistleblower Protections and the Non-Retaliation and Non-Intimidation policies for more details.
What Happens When I Make a Report?

We will investigate all reports of suspected violations of the Code or the law. When you report a possible violation of the Code, of Healthfirst policies, or of applicable law, you may ask to remain anonymous. The anonymous ethics hotline and website are managed by an independent third-party provider (EthicsPoint) whose trained representatives may ask specific questions about the situation and submit a report to the Compliance department. EthicsPoint will provide you with a report key and ask you to create a password in order to access information on the status of your report. Under certain circumstances, the inability to interview anonymous reporters may limit the ability of Healthfirst to complete its investigation.

All reports will be treated as confidential, and information will be shared only on a need-to-know basis among those responsible for conducting the investigation. However, we may have to disclose your identity if law enforcement is involved in the investigation or if required to in the course of legal proceedings.

Individuals are required to fully cooperate with all audits, investigations, or other reviews, whether conducted internally by Compliance, SIU, Legal, Internal Audit, or the Human Resources department, its contractors, or by an outside government agency. This means you are required to comply with all requests for documents, information, and interviews without delay. Your responses must be complete and truthful. Failure to cooperate may result in disciplinary actions in accordance with Healthfirst’s Disciplinary Actions Policy.

If it is determined that a violation of the Code, of related policies, or of any applicable federal, state, or local laws has occurred, appropriate corrective action will be taken.

It is important to note that whether you report a concern, participate in an investigation, or are a manager of a team involved in a concern, you may not necessarily learn all the details nor the final outcome of an investigation.

Non-Retaliation and Non-Intimidation

Healthfirst has a strict policy of non-retaliation and non-intimidation against individuals who raise concerns, ask questions, or participate in investigations in good faith, even if it is later determined that no wrongdoing occurred. We also do not tolerate any action against individuals who, in good faith:

- Report a violation to Healthfirst, a government agency, or a law enforcement agency
- Cooperate with an internal or governmental investigation
- Participate in activities, including self-assessments and audits, in support of our compliance programs
- Provide information to Healthfirst or the government about a breach in law or in Healthfirst policy

Prompt action will be taken in any instance where retaliation or intimidation occurs, up to and including termination of employment or contract. Review the full policy for more information.

See the Reporting Compliance Concerns and Whistleblower Protections and the Internal Investigations policies for more details.

Q&A

Q: Will I get into trouble for reporting a suspected violation of the Code, of Healthfirst policies and procedures, or of federal and state laws?

A: No. Healthfirst has a strict policy of non-retaliation and non-intimidation against an individual who has made a report in good faith or who participates in an internal or external investigation. All individuals are expected to cooperate with investigations.
Advancing Equal Employment Opportunities and a Diverse Workforce

We all benefit from a diverse work environment. To ensure that our workforce represents the many communities we serve, Healthfirst is committed to equal opportunity hiring practices. We believe that the fair and equitable treatment of our employees and those doing business with us is an essential part of who we are.

We provide a work environment that welcomes employees of all backgrounds without regard to age, race, disability, ethnicity, marital or family status, national origin, religion, gender, sexual orientation, veteran status, genetic information, or other characteristics protected by law. We do not engage in discrimination when considering any employment decision or disciplinary action, and we make sure all employees have an equal opportunity to succeed.

For more information, see the Equal Employment Opportunity and Anti-Discrimination Policy.
Maintaining Responsible Behavior Regarding Drug and Alcohol Use

Healthfirst is committed to maintaining a drug- and alcohol-free working environment. You may not bring, possess, or use any illegal drugs in the workplace, and you are also prohibited from reporting to work unable to perform your job due to off-the-job use of alcohol, medication, or illegal drugs. Except for very limited circumstances, alcohol use is prohibited on company time, in the workplace, or during offsite meals or events when you expect to return to work. This standard applies while you are on company property and other locations when you are working on behalf of Healthfirst.

Refer to the Drug-Free Workplace and Substance Abuse policy on page 9 of the Employee Manual for more details.

Safety in the Workplace

Healthfirst is committed to providing a hazard-free work environment for all individuals and recognizes the need to comply with relevant federal, state, and local occupational health and safety laws (e.g., OSHA). Individuals must be equally committed to adhering to safe work practices and maintaining a safe work environment. All individuals should observe safety rules at all times and make accident prevention a priority. Healthfirst will enforce all safety rules, and individuals who violate them will be subject to disciplinary action, up to and including termination.

You are responsible for:

- Reporting unsafe work conditions or practices so that issues can be corrected promptly
- Following all emergency procedures in the event of a fire or any other emergency
- Cooperating in the investigation of accidents
- Reading and complying with Safety Programs and Safety Rules

Please see Trail Safety on page 37 of the Employee Manual for more details.

All individuals should observe safety rules at all times
OUR RELATIONSHIPS

We exist to serve our members. Their satisfaction and well-being is the best barometer of our success. We are committed to upholding the highest standards of ethical behavior and the protection of privacy and security when we interact with our members, owners, stakeholders, fellow employees, providers, government representatives, and vendors. In order to preserve their trust in our company, we must do our jobs in compliance with applicable laws and regulations and never participate in dishonesty, criminal conduct, or fraud.

Ensuring Confidentiality, Privacy, and Security

Because of the nature of what we do, individuals are often in possession of a broad variety of confidential, sensitive, nonpublic personal and proprietary information. We must maintain the confidentiality and privacy of our members at all costs and actively protect and safeguard sensitive information to prevent unauthorized use or disclosure.

Safeguarding Member Information

You have an obligation to maintain the confidentiality of member information in accordance with all laws and regulations, including the Health Insurance Portability and Accountability Act of 1996 (HIPAA), the federal law that assures privacy for our members. You should never reveal any personal or confidential information concerning members unless you have a legitimate business reason for doing so, such as for member care purposes.

We must do our jobs in compliance with applicable laws and regulations and never participate in dishonesty, criminal conduct, or fraud.

THE COMPLIANCE HOTLINE

1-877-879-9137 and website www.hfcompliance.ethicspoint.com are available 24 hours a day, 365 days a year.
SAFEGUARDING MEMBER INFORMATION

We pledge to always:

- Verify written member information
- Use the highest degree of care to not mix one member’s information with another’s
- Follow appropriate guidelines for disposing of written or electronic member information
- Encrypt all emails containing member information that are sent outside of Healthfirst’s email system
- Use only Healthfirst-approved personal mobile devices, flash drives, or cameras to store, download, or capture member information
- Access or use member information only as necessary to perform our job duties
- Access, use, and disclose only the minimum amount of member information necessary to carry out our job functions
- Never share member information with others who do not have a job-related need to know, including coworkers, family, and friends
- Never disclose our user IDs or passwords for company computers and devices, and log off when we are away from our workstations
- Ask members for permission to speak to them when family or friends are present and to evaluate our surroundings and speak discreetly
- Report all privacy concerns or potential violations immediately to the Privacy Officer or to the Privacy Inbox at HIPAAPrivacy@healthfirst.org.

For more information, refer to the Enterprise Privacy policy.
Identifying and Preventing Fraud, Waste, and Abuse

We work at the highest level of openness, honesty, and integrity. We honor our commitments and keep our promises. Transparency fosters trust. You should never participate in activities that may violate laws that protect against fraud and abuse. If you are aware of any fraudulent activity, you must do the right thing and report it promptly to either your supervisor, department management, Corporate Compliance, the Compliance Officer, Regulatory, Legal, SIU or Human Resources or through the anonymous reporting channels available. Additional information on the laws and regulations in this section and how to identify, prevent, and detect fraud and abuse is contained in the Guide to the Compliance Program, which can be found on the Healthfirst intranet.

Deficit Reduction Act of 2005

As a participant in the Medicaid program, Healthfirst must comply with the terms of the 2005 Deficit Reduction Act, otherwise known as "DRA." This requires any organization that receives $5 million or more a year in federal funds to adopt a compliance program in accordance with the law and to inform its employees and any contractor or agent of the terms of the False Claims Act.

In order to meet this requirement, all employees and other applicable individuals are trained on our Compliance Program; Fraud, Waste, and Abuse; the False Claims Act; and the Deficit Reduction Act, as well as on other related laws and regulations, during new-hire orientation and during our annual compliance training.

Q&A

Q: What is confidential information?

A: Confidential information is data or information that is not available to the public.

Examples include:
- Members’ Protected Health Information
- Provider information
- Pricing information
- Billing information

Examples of Fraud, Waste, and Abuse

- Knowingly submitting a false claim for payment
- Failure to refund duplicative copayments or premiums from beneficiaries
- Denying a Medicare beneficiary the right to appeal
False Claims

The False Claims Act is a federal law that is intended to prevent fraud in federally funded programs such as Medicare and Medicaid. Everyone at Healthfirst must make sure that all claims submitted to the government for payment are true and accurate.

If you submit a false claim, both you and Healthfirst may be held liable. In addition to the federal False Claims Act, New York has enacted similar state laws. Both federal and state False Claims Acts apply when a company or person:

- Presents to the federal government a false or fraudulent claim for payment
- Uses a false record or statement to get a claim paid by the federal government
- Conspires with others to get a false or fraudulent claim paid by the federal government
- Uses a false record or statement to conceal, avoid, or decrease an obligation to pay or transmit money or property to the federal government

Please see False Claims Act on page 16 of the Employee Manual for further guidance.

Anti-Kickback Statute

The Anti-Kickback Statute outlines criminal penalties for certain acts which impact Medicare, Medicaid, or any other federally funded or state-funded program. If you solicit or receive payment for referring an individual to a third party (doctor, hospital, provider) for a service for which payment may be made, you can potentially be perceived as receiving a kickback. Payment includes cash or any goods or services from healthcare facilities, programs, or providers.

You must not offer or receive payment or improper incentives to influence decisions regarding member referrals and/or purchases of supplies or services. You should also not accept free goods, services, discounts, rebates, or allowances without prior approval from Compliance and the Purchasing department.

For more information, see the Anti-Kickback section on page 16 of the Employee Manual.

Cooperating with Government Inquiries

You must cooperate with federal or state government inquiries or inspections if necessary. If you are contacted by a government agency, inform your supervisor or the Compliance Officer right away.

Any information, documents, or testimony that is provided to a government agency must be truthful, accurate, timely, and complete. You must work with the Legal, Regulatory, Compliance, and Privacy departments before submitting any documentation to be sure that the information is appropriate and meets all applicable requirements.
Avoiding Conflicts of Interest

In the course of doing business, we may from time to time encounter conflicts of interest when our personal, financial, social, or political interests interfere with our ability to make objective business decisions on behalf of Healthfirst.

You and the members of your immediate household are expected to avoid real or perceived conflicts of interest with the company. These conflicts may happen due to your influence over certain activities or business decisions; through the disclosure of Healthfirst’s confidential business affairs or plans; or if you receive personal benefits because of your company connections.

Identifying Conflicts of Interest

You may have a conflict of interest if you, a family member, or a member of your household:

- Holds a financial interest in any business, government entity, or nonprofit that does business with Healthfirst or is one of our competitors
- Uses company time or assets for personal use or non-job-related activities
- Gains personal benefits from opportunities or resources that came to you as a result of your work with Healthfirst
- Acquires a significant ownership interest in any business other than a privately held family business

Outside Employment or Personal or Business Commitments

Any employment outside of Healthfirst has the potential to create a conflict of interest. This means that certain activities may need to be approved in advance by your manager to ensure that they don’t create a conflict with your job here at Healthfirst. These activities include:

- Working for another company
- Serving as a partner or board member of another company
- Running for public office or serving as a public official
- Running your own business
- Contributing to a charity, foundation, or nonprofit organization with interests that intersect with the business of Healthfirst or with our position on a public policy

Outside employment or personal business commitments may be permitted if they are not likely to impair your ability to meet your responsibilities to Healthfirst and don’t involve organizations that compete with Healthfirst or that currently do, or are seeking to do, business with Healthfirst.

THE COMPLIANCE HOTLINE

1-877-879-9137 and website www.hfcompliance.ethicspoint.com are available 24 hours a day, 365 days a year.
Gifts and Entertainment

We understand that from time to time you may receive, or wish to give, gifts or entertainment to an external colleague or business associate to show friendship, appreciation, or thanks. When done within established limits, such gifts and entertainment (“business courtesies”) continue to be an allowed and appropriate practice.

However, you must always use good judgment and discretion to avoid even the impression that the gifts in question might influence your business decisions. As a general rule, don’t seek or accept gifts or business courtesies that are greater than a nominal value ($50) from a business partner or anyone seeking to do business with Healthfirst without the permission of your supervisor or the Compliance Officer, as it may be inappropriate. This rule applies as well to the giving of gifts or business courtesies to external parties. Receiving gifts and other small items such as pens and notepads having a value of $50 or less is acceptable, with a $100 total aggregate per calendar year limit from all vendors or competitors combined.

Giving or accepting modest business courtesies, such as business dinners, may be acceptable if you are accompanied by the business partner. If the business courtesy contains a form of entertainment, such as a show, the setting must be conducive to business discussion and not damage the reputation of Healthfirst.

You may accept personal gifts of a nominal value under appropriate circumstances; however, cash or cash equivalents such as checks, non-merchant-specific gift certificates, or coupons are not allowed and should not be offered or accepted under any circumstances. You should never accept a gift or tips from any prospective or current members for performing your routine job duties.

You may never accept from or give gifts to any government employee, even if there is no intent to influence an official action.

If you are unsure of whether a gift or business courtesy would cause a perceived conflict, speak to your supervisor or contact the Compliance Officer.

Acceptable Gift or Entertainment?

<table>
<thead>
<tr>
<th>YES</th>
<th>NO</th>
</tr>
</thead>
<tbody>
<tr>
<td>Gift baskets to be shared with other employees</td>
<td>A $60 bottle of wine</td>
</tr>
<tr>
<td>A round of golf with a business partner</td>
<td>A week-long, expenses-paid trip at a resort</td>
</tr>
<tr>
<td>Dinner provided for all speakers at a conference</td>
<td>Tickets to dinner and a show for you and your partner</td>
</tr>
</tbody>
</table>

If you believe that you or a family member may be involved in a conflict of interest, contact your supervisor or manager immediately. If a potential situation or transaction seems as if it may cause a conflict, discuss it with the Compliance or Legal departments before taking action or engaging in the transaction.

Please see the Conflict of Interest Policy for Healthfirst Employees for more information and other scenarios.
Work Product Ownership
Any work that you create on behalf of Healthfirst belongs to the company. Work that you create while employed by Healthfirst can’t be claimed, construed, or presented as your property, even after your employment with Healthfirst has ended or the project has been completed.

Company Resources and Business Opportunities
Company resources should be used only for Healthfirst’s benefit. You must not pursue business opportunities for personal gain that would be in direct competition with the company or that you discovered through the use of Healthfirst’s property or information. If you are a director or officer of Healthfirst, you must first get the approval of General Counsel before making any personal transactions with Healthfirst or any of its subsidiaries.

Fairness in Purchasing and Contracting
Healthfirst’s vendor and contractor relationships are built on integrity and fair business dealings. Selecting goods, services, and vendors for Healthfirst must be done in a fair and objective manner, and you shouldn’t use your position with the company to advocate for or against a vendor unfairly. Criteria used to select a vendor must be documented, with the terms and purchase conditions clearly defined.

Only those who are expressly authorized to do so may enter into a binding contract with an outside vendor or independent contractor on the company’s behalf. If you would like to request a new vendor, you must submit the request through the Vendor Compliance and Risk Management process. When you contract with a vendor, you are responsible for making sure that the vendor is in compliance with the Code and applicable policies and procedures for work that is assigned to the vendor.

Fair Business Practices and Antitrust Issues
Healthfirst seeks to be the preeminent health plan in our market through ethical and fair competition. We must maintain and grow our business through the superior quality of our products and services rather than through any unfair or illegal business practices. In everything—from selling and marketing, contracting with vendors and providers, paying claims, and providing customer service—we must always act with honesty and avoid any unfair advantage. Misrepresentation of information, manipulation, or taking advantage of others is strictly prohibited. Individuals are required to comply with all state and federal antitrust laws. Antitrust laws are designed to foster fair and honest competition and to prevent competitors from entering into agreements to fix prices or reduce price competition. In order to avoid any appearance of unfair practices, you should not discuss Healthfirst business with a competitor or supplier or disclose terms of our supplier relationships. If you have any questions about appropriate business conduct, do the right thing and contact the Compliance Officer or Legal Counsel.
Protecting Healthfirst’s Assets and Information

Healthfirst’s assets include our information systems, confidential information, intellectual property and research, funds, records, and physical facilities. Company assets can only be used for Healthfirst business purposes, and you must take care to protect company assets and dispose of these assets according to our policies. You are expected to exercise reasonable judgment when using Healthfirst’s assets and to spend or use these assets as carefully as you would your own.

Proprietary Information

As mentioned before, all company records and information relating to Healthfirst or its members should be kept confidential and treated with the utmost care. Unless you have a business reason to do so, company information (including documents, notes, files, records, verbal conversations, computer files, or similar materials) may not be disclosed or removed from company premises without permission from Healthfirst.

You must also be careful not to reveal any confidential information, purposefully or inadvertently, through casual conversation, to any unauthorized people. Confidential information includes business plans, intellectual property, member lists, financial information, and anything that would be useful to competitors or harmful to anyone if disclosed. If you are unsure about the confidential nature of specific information, ask your manager for clarification. Violating this policy could mean disciplinary action, up to and including termination of employment.

See the Global Information Services policy for more details.

Protecting Intellectual Property

Intellectual property such as patents, copyrights, inventions, trademarks, ideas, and strategies are also considered company assets and must be protected accordingly. All research and intellectual property created while employed with Healthfirst is company property.

You must be careful not to reveal any confidential information, either purposely or inadvertently, through casual conversation.
Proper Use of Healthfirst Funds

Healthfirst funds must be handled with honesty and responsibility. Corporate credit cards may be used only for authorized business purposes and never for personal expenses. Please be sure to follow all Healthfirst guidelines relating to travel and entertainment expenses.

See the Travel and Expense policy for more details.

Protecting Our Facilities

Healthfirst’s physical facilities must be kept secure in order to protect the safety of our members, employees, and business assets. To help us keep these areas safe:

- Do not allow unauthorized individuals to access company buildings or facilities
- Have your Healthfirst ID badge with you at all times
- If you see people without proper identification or unaccompanied by a Healthfirst employee in a restricted area, ask an authorized person to assist them to an appropriate area or contact security

Please see the Visitor Access policy for more details.
Accurate Financial Reporting and Record Keeping

All financial reports, accounting records, expense accounts, timesheets, and other documents must accurately and clearly represent the relevant facts and true nature of a transaction. Improper or false accounting, documentation, or financial reporting is in direct violation of company policy and may also be illegal.

Under applicable laws, regulations, and certain contracts, Healthfirst is required to maintain accurate and detailed corporate records. These records are usually required to be kept for a specified period of time. Failure to retain these records can subject Healthfirst to penalties, fines, and other actions.

Therefore, you must:

- Maintain complete and accurate records
- Retain records in accordance with applicable laws, regulations, and other requirements
- Encrypt all confidential information sent or stored electronically
- Prevent unauthorized use or disclosure of records that contain confidential information, including privileged materials and client information
- Properly dispose of records that have been maintained for the required retention periods

Check the Business Document Retention & Destruction policy for more information.
UPHOLDING THE COMPANY’S REPUTATION

Communication
At Healthfirst, we use candor and honesty when communicating with our customers, business partners, stakeholders, and auditors. We emphasize the benefits of our own products and services rather than deriding those of our competitors. We must make only honest and accurate statements about our products and services when promoting our business and managing working relationships.

Media Inquiries
Only authorized representatives may speak on behalf of Healthfirst. If you are contacted by the press or a member of the media, you should direct them to Corporate Communications.
When using social media or other personal communications, you should never give the impression that you are speaking on behalf of the company.
If you have permission to speak on behalf of Healthfirst, any information you provide must be approved in advance by the appropriate people and be fair, complete, and timely.

Electronic Activity and Social Media
Our high ethical standards also apply to our use of social media such as Facebook, Twitter, blogs, wikis, and more. When communicating business information that is directly or indirectly related to Healthfirst, at work or on personal time, you must do so in a way that is consistent with your responsibilities as a trusted employee. You may not at any time post PHI, employee health information, or confidential business information to any social media platforms unless authorized to do so by Corporate Communications.
Individuals must be trained before they are authorized to publish or distribute approved company information via social media.
Check HR’s Social Media Policy for Healthfirst Employees for more information.

THE COMPLIANCE HOTLINE
1-877-879-9137 and website www.hfcompliance.ethicspoint.com are available 24 hours a day, 365 days a year.
Political Activities
You are expected to avoid activities that may jeopardize the tax-exempt status of the company, including a variety of lobbying and political activities. When you make political contributions or engage in political activities on a personal basis, please take care to clearly distinguish personal political views from those of Healthfirst. Use of Healthfirst assets in connection with any political activity is not allowed and could be construed as a “political contribution” that may violate laws that apply to corporate contributions.

Our Environmental Impact
Healthfirst manages and operates its business in a manner that respects our environment and conserves natural resources. You can help Healthfirst reduce its environmental impact by reducing waste, recycling, and conserving water and energy when possible.

Exclusion Screening/Background Checks
At Healthfirst, we have the utmost respect for the laws that govern our industry. As a result, we will not knowingly employ, contract with, or do business with individuals or organizations that, for any reason, have been excluded from government contracting or are not allowed to contract with the Medicare, Medicaid, or other government health programs. We will also conduct monthly screenings and comprehensive background checks on all employees and other applicable individuals to make sure that they continue to be in good standing. If you are not, disciplinary action may be taken, up to and including termination.

Please see the Background Checks policy for more information.
LIST OF POLICIES REFERENCED IN THE CODE

Reporting Compliance Concerns and Whistleblower Protections
Non-Retaliation and Non-Intimidation
Internal Investigations
Equal Employment Opportunity and Anti-Discrimination
Drug-Free Workplace and Substance Abuse
General Employee Safety

Enterprise Privacy
Guide to the Compliance Program
False Claims Act
Anti-Kickback
Conflict of Interest Policy for Healthfirst Employees

Global Information Services
Travel and Expense
Visitor Access
Business Document Retention & Destruction
Social Media Policy for Healthfirst Employees

Background Checks
Disciplinary Action
Compliance Issue Handling and Escalation
Compliance Monitoring and Auditing Program

Policies may be made available upon request to compliance@healthfirst.org.
COMPLIANCE PROGRAM OVERSIGHT

Interpreting the Code
Our Compliance department and Chief Compliance Officer work with the Legal department to interpret and apply the Code. If you have any questions, please direct them to the Chief Compliance Officer or to the Legal department.

Reporting to the Audit, Risk and Compliance Committee
The Chief Compliance Officer reports on the status of Code compliance to the Audit, Risk and Compliance Committee (ARCC) of the Board of Directors. The report may recommend policies and procedures to improve the Code or suggest different means of implementing and enforcing it.

Amendments to the Code
The current version of the Code is available for viewing on the Healthfirst website and intranet. Significant amendments will be disclosed on our public website. Only the Audit, Risk and Compliance Committee or the Executive Committee of the Board of Directors may amend or modify the Code. The Chief Compliance Officer may make administrative changes to the Code between annual approval of the Code.

If you believe that a waiver from a provision of the Code is applicable, you may submit a written request to the Chief Compliance Officer. Most waiver requests will be determined by the Chief Compliance Officer, while those submitted by an executive officer or the Board of Directors will be forwarded to the Audit, Risk and Compliance Committee of the Board of Directors for review and determination. All waivers will be considered and approved based on a prescribed criteria and shall be evaluated in a manner that ensures consistency and fairness.

Requests for waiver of the Code are rarely, if ever, granted and are granted for exceptional circumstances only. All waivers requested and dispositions thereof will be documented and logged.

THE COMPLIANCE HOTLINE

1-877-879-9137 and website www.hfcompliance.ethicspoint.com are available 24 hours a day, 365 days a year.
A Message from Our CEO

<table>
<thead>
<tr>
<th>Our Mission and Our Culture</th>
<th>Purpose and Scope of the Code</th>
</tr>
</thead>
<tbody>
<tr>
<td>Our Core Responsibilities</td>
<td>Our Workplace</td>
</tr>
<tr>
<td>Our Relationships</td>
<td>Our Business</td>
</tr>
<tr>
<td>List of Policies Referenced in the Code</td>
<td>Compliance Program Oversight</td>
</tr>
</tbody>
</table>

NOTES

THE COMPLIANCE HOTLINE

1-877-879-9137 and website www.hfcompliance.ethicspoint.com are available 24 hours a day, 365 days a year.
<table>
<thead>
<tr>
<th>A Message from Our CEO</th>
<th>Our Mission and Our Culture</th>
<th>Purpose and Scope of the Code</th>
<th>Our Core Responsibilities</th>
<th>Our Workplace</th>
<th>Our Relationships</th>
<th>Our Business</th>
<th>List of Policies Referenced in the Code</th>
<th>Compliance Program Oversight</th>
</tr>
</thead>
</table>

NOTES

---

THE COMPLIANCE HOTLINE

1-877-879-9137 and website www.hfcompliance.ethicspoint.com are available 24 hours a day, 365 days a year.
A Message from Our CEO
Our Mission and Our Culture
Purpose and Scope of the Code
Our Core Responsibilities
Our Workplace
Our Relationships
Our Business
List of Policies Referenced in the Code
Compliance Program Oversight

NOTES

THE COMPLIANCE HOTLINE
1-877-879-9137 and website www.hfcompliance.ethicspoint.com are available 24 hours a day, 365 days a year.
Code of Conduct

To report suspected fraud and abuse, or other violations of company policy, call 1-877-879-9137 or go to www.hfcompliance.ethicspoint.com