

Code of Conduct	Effective Date: 01/01/2021
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	Owner: Chief Compliance Officer
	Approving Authority: Board of Directors

A message from the President...

Our members put their trust in us in some of the most important and difficult moments of their lives. They need us to do our work well, and that begins with doing our work honestly and ethically.

To that end, the Blue Cross and Blue Shield of Kansas Board of Directors has adopted the following Code of Conduct to assure that each and every employee knows and understands the business rules we live by.

I ask that you periodically read this document to refresh yourself on rules and the principles we live by. If you are aware of any known or suspected violations, please do not hesitate to contact the chief compliance officer or report it to the confidential and anonymous reporting website at www.whistleblowerservices.com/bcbs or its secure hotline at 866-301-7627. If you have any questions or need clarification regarding the Code of Conduct, contact the chief compliance officer Dan Roehler at (785) 291-8607.

Thank you for all you do.

Matthew D. All

2023 Code of Conduct

Standard 1: We Hold Ourselves Accountable

Regardless of whether it is required by law, contract, or company policy, we do what we say, and we say what we do.

Blue Cross and Blue Shield of Kansas has a high standard of behavior for employees at all levels. Although they may vary based on your role in the company, there are rules, laws, and regulations of our industry that are intended to protect our members, employees, and the company as a whole. BCBSKS has higher expectations regarding accountability than what these laws and rules require. Ultimately, *employees of BCBSKS are expected to comply with the law, corporate policies, and procedures because it is the right thing to do – not just because we have to.*

Following the Code of Conduct is not optional – it is expected of all employees, as is reporting possible violations when you see them. Failure to follow the Code, to report violations, or to retaliate against those who report in good faith, can result in disciplinary actions up to and including termination. *We expect our employees to follow the Code of Conduct and to report possible violations without fear of retaliation.*

We provide a special, unique product. We sell promises, and we must keep them; these include promises to pay for covered services, promises to control the cost of health care by not paying for non-covered services, and promises to perform our work accurately and timely. This means *employees of BCBSKS are expected to strive every day to ensure every promise we make is kept.*

Expectation	Examples of this Expectation in Action
Be aware of the laws, regulations, policies, and procedures that apply to your job role, and follow them.	<p>Employees must understand and comply with policies and procedures as documented and available via the company intranet.</p> <p>Employees must understand and comply with federal and state mandates, licensing standards, and trade practice guidelines. Based on individual job roles, these responsibilities vary.</p> <p>If your job role is related to government programs, you may have additional oversight requirements and specific documentation formatting.</p> <p>Some jobs require certifications or licenses that are kept on file with state and federal regulators. Employees are responsible for maintaining those certifications.</p> <p>All employees are required to complete mandatory trainings, both corporate and departmental, in a timely fashion.</p>

	<p>If you are unsure of how policies, procedures, rules, and/or regulations apply to you and your job, it is your responsibility to ask. Employees can ask their supervisor directly, but they are also provided a direct line to the compliance office or human resources with questions or concerns. There is no chain of command when it comes to understanding or reporting regulatory expectations.</p>
<p>Anyone with supervisory responsibility shall be held to a higher standard regarding compliance and accountability.</p>	<p>Anyone with supervisory responsibility is expected to be a role model of compliance with rules and regulations. With greater responsibility comes greater accountability.</p> <p>Anyone with supervisory responsibility is expected to hold their direct reports accountable for adherence to corporate policies and performance of job responsibilities and trainings. Employees with supervisory responsibility are responsible for holding their employees accountable for expected behaviors; they are also expected to model those behaviors.</p>

Standard 2: We Are Truthful and Forthcoming

BCBSKS employees are expected to be honest in all aspects of our jobs. When it comes to truth and accuracy, "good enough" isn't good enough.

Each employee is responsible for ensuring the information they record and report is truthful, accurate, and complete. *Falsifying, withholding, or altering information is explicitly prohibited.*

From time to time employees will be asked to assist with investigations and audits. *Employees must fully cooperate with any investigation or audit request.*

Expectation	Examples of this Expectation in Action
Willingly provide complete, truthful information when requested for reports, audits, or investigations.	<p>Answer questions and/or provide documentation within the requested timeframe. These requests include but are not limited to:</p> <ul style="list-style-type: none"> • Legal, human resources, or compliance investigations • Internal or external audits • Required reports by the state or federal government • Required reports outlined in contracts <p>Employees are expected to cooperate and comply with all interview requests during an investigation or audit.</p>
Employees will not interfere with an investigation or audit.	Employees must never discourage others from cooperating with an audit or investigation request.

	Employees must never destroy or alter documents or data related to an investigation or audit.
Report any inaccuracies, both intentional and unintentional as soon as they are discovered.	<p>If you discover an error, call attention to it right away, even if the error was a mistake made by you or someone else. Making a mistake isn't nearly as bad as ignoring one.</p> <p>If you discover falsification, withholding, or alteration of information, report it right away. Failure to report a known error is an intentional act.</p>
An employee must never falsify or improperly alter information.	<p>Employees must never submit false or misleading information. Examples include but are not limited to:</p> <ul style="list-style-type: none"> • Expense reports • Claims • Timesheets • Performance data (e.g., Member Touchpoint Measures, productivity data, financial reporting, etc.) <p>If anyone, regardless of their position within the company, asks you to falsify, withhold, or improperly alter information contact the chief compliance officer, or report it to the confidential and anonymous reporting website at www.whistleblowerservices.com/bcbs or its secure hotline at 866-301-7627.</p>

Standard 3: We Protect Information and Assets

It is the responsibility of all employees to treat corporate data, records, and property with respect – following policies, procedures, and regulations meant to protect privacy, confidentiality, and assets.

In our highly regulated industry, there is specific information that requires the utmost protection under the law. The company has policies and procedures related to these laws to ensure these requirements are met at all times. *Employees must understand the rules regarding protected information and follow them – always.*

Many business decisions and the data used to support them are considered confidential and proprietary. That information must be guarded and only used or shared for its intended business purpose. *Employees must never share confidential or proprietary information without appropriate authorization and must safeguard this information diligently.*

The resources provided to employees to do their jobs are to be used only for business purposes. *Employees should never use company property for unauthorized personal use.*

Expectation	Examples of this Expectation in Action
Employees must never intentionally access or disclose protected health information (PHI) for unauthorized purposes.	Employees must never use corporate systems to access information about themselves or other

	<p>people without a legitimate business reason to do so.</p> <p>Employees must share only the minimum necessary PHI in response to any inquiry.</p> <p>Employees must only share information with those who have authority to receive it.</p>
All corporate records and information must be created, stored, and destroyed based on the company's record management policies.	Employees are required to use the company's record retention schedule (RRS) to ensure they are continually storing and destroying records in accordance with policies and procedures.
Employees must adhere to company policy regarding the use of corporate assets and resources.	<p>Employees must use company resources within policy guidelines. Company resources include, but are not limited to:</p> <ul style="list-style-type: none"> • Computers and tablets • Network storage • Company data • Copiers • Email • Supplies • Company credit cards • Company paid time • Travel expenses <p>Employees must not use company assets to personally engage in political activities, including promotion of any political cause, candidate, or campaign, unless specifically authorized as part of their work duties.</p>
Employees must properly manage confidential and proprietary records.	<p>Employees must utilize established security measures when working with confidential and proprietary records. These records include but are not limited to:</p> <ul style="list-style-type: none"> • Personally Identifiable Information • Financial records • Employee records • Company documents

Standard 4: We Conduct Our Business with the Highest of Ethical Standards

Every choice employees make should be done with positive intent and integrity – honoring the trust our members place in Blue Cross and Blue Shield of Kansas to act on their behalf. Employees should avoid conflicts of interest and impropriety, or the appearance of impropriety, at all times.

A conflict of interest is a situation where your personal circumstances could influence your judgment or decisions, making it difficult for you to act in the best interest of the company. Even the appearance of a potential conflict of interest can cause our business partners and customers to question our motives; therefore, we must ensure that our personal interests do not create such a situation. *Employees should avoid and must disclose any potential conflicts of interest.*

Employees must never accept favors from potential business partners in exchange for BCBSKS' business, or the prospect of BCBSKS' business. When engaging with potential customers, BCBSKS employees are never to offer favors. *Employees must never offer or accept a bribe or a kickback.*

A commitment to ethical standards requires us to conduct our business in a manner that helps maintain a free and competitive market for our goods and services. The way our employees conduct business must not interfere with the maintenance of a level playing field among our business competitors. *BCBSKS is committed to the promotion of fair competition in the marketplace.*

Expectation	Examples of this Expectation in Action
Employees must disclose potential conflicts of interest.	Employees must complete a conflict of interest disclosure under the following circumstances: <ul style="list-style-type: none">• Upon hire• Annually as requested by the compliance department• Any time a new potential conflict of interest arises. Examples include, but are not limited to:<ul style="list-style-type: none">○ When an employee takes a second job○ A family member's business contracts with BCBSKS○ A family member begins working for a contracting provider, or vendor
Employees must follow the company's rules regarding gifts and favors.	The following limits apply regarding gifts and favors: <ul style="list-style-type: none">• Employees must not accept cash or cash equivalent gifts of any amount, from any current or potential vendor or business partner.• Employees may accept gifts or gratuities from current or potential vendors under the following circumstances:<ul style="list-style-type: none">○ There is a \$150 <i>cumulative</i> limit on gifts from any one vendor during a calendar year. These types of gifts include:<ul style="list-style-type: none">▪ Non-monetary gifts.

	<ul style="list-style-type: none"> ▪ Merchant-specific gift cards. Cash equivalent cards such as Visa gift cards are prohibited. ▪ Meals and entertainment if the provider of the gift is present. Spouse/family expenses must not be accepted. ○ Employees must not accept travel or registration for conferences, seminars, and/or training programs from vendors unless the travel and/or registration are specifically associated with user training for a product under a current contract. • Circumstances regarding gifts and favors can be ambiguous (meals, services, favors, expenses paid on your behalf, etc.). If employees are presented with these opportunities, it is their responsibility to report them to their manager or the compliance department for guidance. It's always better to decline offers when uncertain.
Employees must take great care to ensure fairness and appropriateness when sharing and/or using the company's proprietary information, or information about competitors.	<p>Employees must refrain from talking about internal business decisions or share other proprietary information in a manner that could be used by competitors.</p> <p>Employees must never obtain information about competitors in a manner that violates contractual agreements or the law.</p>
Employees must take special care to avoid engaging in anti-competitive activities or unfair trade practices.	<p>Employees must refrain from anti-competitive activities and unfair trade practices including, but not limited to:</p> <ul style="list-style-type: none"> • False advertising • Defamation of other companies • Unfair underwriting • Collusion with other companies to fix prices • Price or rate sharing • Misrepresentation of data
Employees will represent the company in a professional manner.	<p>Employees should not officially represent the company outside the scope of their job role.</p> <p>Employees must not present their personal, political, or other opinions in a manner that could be construed as those of the company.</p>
Employees hold themselves and others accountable for demonstrating behaviors that align with the BCBSKS core values.	<p>Employees need to familiarize themselves the company's core values and demonstrate the "We Statements" associated with them when working with external contacts or coworkers.</p> <p>Employees will be held to the same standard of behavior whether they are interacting with coworkers or external contacts.</p>

Standard 5: We Cultivate a Safe and Civil Workplace.

Employees have a right to feel safe and secure, both physically and emotionally, in the workplace. BCBSKS is committed to creating an environment conducive to productive work and civility.

BCBSKS encourages a climate of respect and inclusiveness that welcomes and embraces community members with diverse backgrounds and life experiences, deliberately seeks multiple perspectives, and supports the free and open exchange of ideas. As such *all employees are expected to respect the rights and dignity of others.*

Regardless of where you're working, BCBSKS employees should always consider themselves ambassadors of the company. *Cultivating a safe and civil workplace does not stop when you leave the office.*

BCBSKS acknowledges the importance of the health and wellbeing of its employees and the community. *Employees are expected to follow guidelines designed to ensure the health and safety of employees, and those we interact with.*

Expectation	Examples of this Expectation in Action
We treat one another with respect and dignity.	<p>We assume positive intent in our coworkers.</p> <p>We do not intentionally belittle, demean, or offend our coworkers.</p> <p>We take responsibility for our behavior and address it appropriately. Examples include but are not limited to:</p> <ul style="list-style-type: none">• Our word choice, tone, or nonverbal communication• Our etiquette and professionalism• Owning up to our mistakes• Apologizing when appropriate• Trying to resolve our own conflicts <p>We deliver and receive constructive criticism in a positive manner.</p> <p>Individuals with supervisory responsibility are held to a higher standard regarding the treatment of their direct reports and other coworkers.</p>
We respectfully disagree.	<p>We raise concerns while making decisions; we don't rehash, openly complain about, or undermine decisions once they have been made.</p> <p>After a decision is reached, we proactively address concerns as they arise.</p>
We follow the rules regarding anti-discrimination and anti-harassment to the letter of the law.	We report suspected instances of discrimination or harassment to human resources immediately.

	<p>We follow all BCBSKS anti-discrimination and antiharassment policies throughout every aspect of the employment process.</p>
<p>We act in a manner that is respectful and inclusive of all people and perspectives.</p>	<p>We do not act or speak negatively toward one another based on physical characteristics, lifestyle, or beliefs.</p> <p>We do not engage in hateful speech or actions directed at people or groups of people in circumstances including but not limited to:</p> <ul style="list-style-type: none"> • Performing the functions of your job • Representing or displaying your association with • the company • Directly or indirectly referencing coworkers or the company <p>We expect our employees to consider diverse perspectives, opinions and experiences in circumstances including but not limited to:</p> <ul style="list-style-type: none"> • Making business decisions • Forming committees • Participating in training
<p>We follow all policies to ensure a physically and emotionally safe environment.</p>	<p>We behave in accordance with BCBSKS' safety policies including but not limited to:</p> <ul style="list-style-type: none"> • We do not threaten, stalk, or harass • We do not bring weapons on the premises • We do not use tobacco products on the premises • We do not knowingly come to work with a contagious illness • We display our ID badges <p>We report conditions we believe to be an imminent threat to the health or safety of ourselves or others.</p>