



# Code of Business Conduct

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# A Message from our President & CEO

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As president and CEO of Cambia Health Solutions, what I most want you to know is how much your work matters. Day after day and one decision at a time, you bring the highest ethical standards and integrity to your work. It makes me incredibly proud, and it has real impact. It's how we straighten the health care path for every customer we serve.

Each employee at this company plays a critical role in ensuring every person experiences respectful, supportive, effective and affordable health care. How do we succeed at this most crucial of roles? At Cambia, the foundation for success has always been our commitment to ethics and compliance, as well as our ability to act with integrity and in line with our values. It means we treat our customers the way we want our family to be treated. Our customers trust us at some of the most important moments in their lives—as they experience the joy of a new baby, manage a chronic disease or deal with a serious diagnosis like cancer. I ask you to bring your heart to work with you each day and to remember there are real people behind each claim we process and each phone call we answer.

The Code of Business Conduct outlines Cambia's expectations for all employees and the actions that will ensure we do the right thing, every time. Spend the time to know this document and understand its importance. Maintaining a strong ethical culture isn't always easy. It takes commitment, dedication and courage.

Not only does every employee commit to abiding by this document, Cambia also publishes the Code publicly on our websites. Every member, customer, regulator, lawmaker, provider and competitor can read this document and measure us against it. We do that on purpose to push ourselves toward excellence and to make sure we're accountable if we fall short.

I also encourage each of you to speak up if you see something that's not right or that we could do better. Our ethical culture is built and sustained on openness, transparency and inclusivity. Talk to your manager, reach out to our Ethics team or even email me. We build trust with each other and our members by keeping our commitments, and that responsibility lies with each one of us.

How we do our work is what defines us as an ethical company. Being an ethical company is what earns us the trust and confidence of those we serve. Thank you for your ongoing commitment to keeping ethics at the core of our company.

Sincerely,

A handwritten signature in black ink that reads "Jared Short".

Jared Short  
President and Chief Executive Officer  
Cambia Health Solutions

# Guiding Principles

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**As Cambia Health Solutions (Cambia) pursues its Cause, we strive to maintain an ethical culture in which individuals feel empowered and accountable for doing the right thing.**

We each play an important role in sustaining and strengthening our ethical culture every day. Cambia expects that you will:

- Act with integrity and trust.
- Comply with this Code of Business Conduct (Code) and other Cambia policies and procedures.
- Comply with all laws and regulations, as well as sub-regulatory guidance that applies to our Medicare Advantage and Part D contracts.
- Be accountable and transparent in your decision-making.
- Foster an atmosphere in which every person is respected.
- Avoid all conflicts of interest with respect to your work with Cambia.
- Safeguard all Cambia and member information and use it only for appropriate business purposes.
- Ensure that fair dealing is the foundation for our relationships and business transactions.
- Ensure that the information we give others is truthful, accurate and complete.



# Our Core Strategies



## Our Cause

To serve as a catalyst to transform health care, creating a person-focused and economically sustainable health care system.



### High-value care

Enable where and how high-value care occurs to improve affordability and access



### Simplify experiences

Use our technology, data and insights to simplify experiences so members can make better health care decisions



### Sustainable growth

Sustainably grow to serve the member for life while maintaining financial stability

## Our Values

The values that guide our behavior:



### Be trustworthy

Act ethically and with integrity, always honoring our commitments.



### Be inclusive

Embrace diverse voices, experiences and perspectives to empathetically serve others.



### Be courageous

Boldly challenge ourselves and others to be accountable, and create positive change for everyone we serve.



### Be innovative

Think differently, experiment and learn. Discover a better way.



### Be results-driven

Ensure our performance delivers impact and value in every action, to improve member health and well-being.

# Our Code of Business Conduct

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Our Code personifies the principles that govern our ethical and legal obligations. It serves as a compass to translate our values into everyday behavior, guide us when in doubt and keep us focused on our common goal of conducting ourselves with integrity. Our Code and the policies we reference cannot anticipate or address every situation or ethical issue that we may encounter in our jobs. Therefore, our Code serves as a guide or roadmap rather than an exhaustive description of Cambia's policies.

While any rules addressed in the Code must be followed, in many cases more specific rule-based requirements are covered in the relevant stand-alone policies and procedures that are referenced in the Code. If you require more detail or guidance for a given situation, you should consult the relevant company policies, procedures and guidelines, or one of the contacts listed in the chart on [page 8](#).

## Our responsibilities

The Code applies to all Cambia affiliates and subsidiaries, employees, officers, board and committee members, contractors and vendors with access to Cambia systems, and anyone who is authorized to act on our behalf. It also serves as guidance to, and may be adopted by, consultants, external sales agents and any other individuals and organizations conducting business with Cambia.

You have the responsibility to familiarize yourself with the Code and to comply with it. Individuals are to ask questions, seek guidance and promptly report suspected misconduct. Cambia commits to take all reports seriously, resolve substantiated reports and take steps to prevent repeat occurrences. Retaliation against anyone who comes forward in good faith will not be tolerated. Failure to comply with this Code or other Cambia policies could subject you to corrective action, up to and including termination.

### When you observe questionable behavior or face unusual circumstances and are uncertain whether to speak up, ask yourself the following questions:

- Is it legal?
- Is it consistent with Cambia's Cause and values?
- Have I checked whether this situation is addressed by Cambia's Code of Business Conduct or other policies and procedures?
- How does the situation make me feel?
- Does it feel right or fair?
- Am I going over it again and again in my head?
- How would other people view this situation?
- How would it look as the lead story on tonight's news?
- Will I be able to sleep soundly if I do not speak up?

These questions can help you discover why you think an ethical conflict may exist. If any of the questions leave you uneasy about the situation, it's time to speak up. Contact your manager or the Ethics Department right away for assistance.

## Additional leader responsibilities

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Our managers have increased obligations as senior custodians of our company values and culture. Managers are expected to personify our values, set the proper tone at the top and model integrity-based conduct for the company. As with all Cambia employees, this includes acting promptly when becoming aware of something that may violate the Code, our policies or the law. As a manager, you must also make sure that the Code is clearly communicated to all those you lead, including contractors and other business partners, so they understand how to conduct themselves in a manner that reflects the highest ethical standards and complies with our Code. You must ensure that your staff completes all required training as well.

Most importantly, since a majority of questions and reports are made to direct managers or other leaders, it is imperative that you create an environment in which people feel comfortable raising issues and that you properly and promptly act on such reports. You should foster an open working environment that encourages workforce members to come to you with any questions, concerns or reports. When workforce members approach you, you should listen, act on the raised concerns and promptly respond. This includes promptly reporting actual or potential Code, policy or legal violations to Ethics or another appropriate resource listed in this Code. Minimally, you should seek out opportunities to communicate and discuss ethical conduct, difficult decisions or other challenging situations with your employees.



# Asking questions and raising concerns



## Where to go for help

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We provide multiple resources for you to report an incident, clarify a situation or ask a question. We don't expect you to have the answer to every question, but we do expect you to know when to ask for help and where to go for help. You may use any of the following resources:

- **Your supervisor or manager.** This is the person who knows you and your job circumstances the best. He or she can advise you specifically and immediately.
- **Higher management.** Other managers welcome hearing from you if you are not comfortable speaking with your manager.
- **Ethics.** Our Ethics team and our anonymous hotline are always available.

All reports will be taken seriously and will be promptly and fully investigated. During investigations, confidentiality will be safeguarded to the highest extent possible. All substantiated violations will be resolved in accordance with policy and procedure, and there will be no retaliation for good faith complaints. Corrective action and steps will be taken to prevent repeat occurrences.

If you're not sure where to go with your concern, the following chart can help you find the right contact.

Anonymous Reporting Line	To report an ethical or compliance concern anonymously	1-888-384-3577
Ethics	For questions or concerns related to expectations of the Code or what constitutes a conflict of interest, or to report an ethical concern	<a href="mailto:eco@cambiahealth.com">eco@cambiahealth.com</a> 1-888-384-3577
Compliance	For questions or concerns related to: <ul style="list-style-type: none"><li>• Medicare compliance</li><li>• Any other compliance issues</li><li>• Privacy and HIPAA compliance</li></ul>	1-877-878-2273
Fraud, Waste and Abuse	To report potential fraud, waste and abuse	1-800-323-1693
IT Security	To report suspected security incidents	1-877-372-8223
Human Resources	For questions or to report a concern regarding a Human Resources issue or items in the <a href="#">Employee Handbook</a> , including, for example, equal employment opportunity/non-discrimination concerns or workplace environment concerns such as drugs and alcohol, weapons or tobacco.	1-888-224-7491 <a href="mailto:EmployeeRelationsEmailAddress@cambiahealth.com">EmployeeRelationsEmailAddress@cambiahealth.com</a>
Records and Information Management	For questions or concerns related to records management, storage, retention requirements and destruction	<a href="mailto:CRMO@cambiahealth.com">CRMO@cambiahealth.com</a>

If you have a concern or complaint about an accounting, internal controls or auditing matter, you may contact the audit and compliance committee chair of the Cambia board of directors at 1-888-655-5452 or [auditchair@cambiahealth.com](mailto:auditchair@cambiahealth.com). Your phone call or email will be routed directly to the chair, who is an independent member of the Cambia board.

## Making a report

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There are some things that are common to most reports. The response to any report ultimately depends on the circumstances. However, we will always listen and take you seriously. A typical investigation may include:

- Interviews with possible witnesses
- Reviews of relevant documents, files and printed material
- A decision-making process to determine if the report is substantiated and if a violation of our Code, other Cambia policy or law has occurred



### **Ethics provides a confidential way to report possible violations of the Code of Business Conduct.**

When you contact Ethics, we will listen, ask clarifying questions and, if appropriate, investigate the concern. Where a concern is not for Ethics to investigate, we will help guide you through the next steps. This may include seeking your permission to refer your concern to the department best suited to address the matter.

## Reporting anonymously

If you choose to make an anonymous report, be sure to:

- Describe the situation in detail and include the business area involved.
- Provide the names of the individuals involved.
- Identify the dates when and where events occurred
- Describe how the situation occurred (e.g., was a procedure not properly followed? Did a supervisor or manager give an instruction?).
- Indicate whether you witnessed the situation or whether someone told you about it.
- Describe any relevant documents and identify their location.



### **We do not retaliate in any way against individuals reporting concerns in good faith.**

We are committed to creating an environment where employees, our business partners and our members feel comfortable speaking up when there are questions or concerns.

When you have an issue or concern, talk to someone who can help—your supervisor, your leadership or Ethics. We strive to maintain confidentiality when evaluating and resolving reports and questions. Trying to stop someone from reporting a concern may result in disciplinary action.

## Corrective and disciplinary actions

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If corrective or disciplinary actions are required as a result of an investigation, Cambia management will determine the proper corrective actions to take, including legal action when appropriate. Each situation or investigation will be defined by its unique facts and circumstances, which will be appropriately factored into any corrective or disciplinary decisions.

## Commitment to non-retaliation

Retaliation is the unfair or inappropriate treatment of an employee because the employee made a good faith report of misconduct, assisted in filing a report or participated in an investigation. Retaliation may be expressed in different ways, both formal and informal. Common examples of retaliation are:

- Exclusion from decisions, meetings or work activities by management or coworkers
- Verbal abuse, harassment or intimidation by management or coworkers
- Denial of a promotion or pay raise
- Relocation or reassignment of job duties
- Loss of job

Retaliation does not include petty slights and annoyances, such as stray negative comments in an otherwise positive or neutral evaluation or negative comments that are justified by an employee's poor work performance. You are not excused from continuing to perform your job or follow company rules, policies or procedures just because you have filed a report with Ethics or Human Resources.

Please see Cambia's [Non-retaliation Policy](#).

### Q & A

**I reported a potential violation last month that implicated my supervisor. Now she seems to treat me differently and informed me without explanation that she is changing my work schedule. I have had the same work schedule for two years. Is this retaliation?**

Significant changes in how you are treated after making a report can be viewed as retaliation.

Cambia has no tolerance for retaliation against employees who have reported an ethics, compliance, human resources or other policy violation in good faith. If your supervisor treats you differently after you report a potential violation to any company policy, you should contact Ethics or the department you reported this potential violation to.

Additionally, anyone who tries to stop someone from reporting an issue may be subject to disciplinary action, up to and including termination.

If you are aware of an active investigation, you must avoid questioning others in an effort to determine who may have reported the violation. This can compromise the integrity of the investigation and also appear to be a form of retaliation.

Speaking up creates opportunities for us to reduce risk, improve our processes and performance, and enhance our culture. You will never be disciplined or penalized for contacting Ethics or any other source in good faith.

# Acting with integrity

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## Conflicts of Interest (COI)

A conflict of interest may exist when you, or a member of your family or household, or a person with whom you share a significant relationship is involved in an activity or has a personal interest (financial or otherwise) that could affect or appear to affect your objectivity in making decisions regarding Cambia.

The most common types of conflicts are: personal relationships, financial interests, and outside employment.



Your COI Disclosure Statement can be accessed anytime on the Ethics Spark site [here](#).

**Part of Cambia's ongoing commitment to sustaining a strong ethics and compliance program and culture is our mandatory conflict of interest disclosure process.**

One of the primary purposes of this process is for each of us to disclose connections and relationships we have to other individuals and entities as defined in the COI Disclosure Statement.

All employees and applicable contractors, who are required to complete the COI Disclosure Statement, must do so within 30 days of hire. Everyone is required to update their COI Disclosure Statement annually or whenever there are changes.

A personal relationship includes your relationship with family members, household members/roommates and anyone with whom you have a significant personal relationship. Family members include your immediate family, such as your spouse, domestic partner, children, parents, siblings, step-relatives and in-laws, and your extended family such as aunts, uncles, cousins, nieces and nephews. Examples of a significant personal relationship could include, but are not limited to, a romantic relationship or a long-time family friend.

We may hire or retain someone with whom you have a personal relationship as long as an actual, potential or reasonably perceived conflict of interest is not created. Conflicts of interest may occur if the employment, promotion or transfer of someone with whom you have a personal relationship would result in the creation of one of the following:

- A manager/subordinate or other close reporting relationship.
- Both of you reporting to the same immediate supervisor.

- You are in positions that could compromise the internal controls or otherwise impact either person's work, salary progress, performance and/or promotion. This includes contractors/contingent workers, interns, and temporary employees, even if employed by an agency.
- The appearance of any other potential or actual conflict of interest.

If a supervisory or managerial employee has a personal relationship (as defined above) with a subordinate, he or she must disclose this to his or her manager. Direct reporting between two employees with a personal relationship is prohibited, due to the conflict it creates. Even if there is no reporting relationship, a conflict of interest may arise if the relationship could cause others to lose confidence in the judgment or objectivity of either employee or if the relationship could cause embarrassment to our company. Managers will partner with Ethics and/or HR to evaluate each situation for conflicts. HR manages and provides support regarding Cambia's policy prohibiting direct reporting between two employees with a personal relationship. Ethics provides guidance and support on managing conflicts of interest due to any other personal relationship.



**Any time you are involved in decisions at Cambia where a personal relationship might affect or appear to affect your decisions, you should disclose that information to your supervisor or manager and remove yourself from the decision-making process.**

Personal financial interests, such as investments above a certain dollar threshold, can create the appearance or existence of a conflict. Please review the [Supplemental Policy on Personal Financial Interests and Investments](#) for further information and guidance.

Gifts and business entertainment can easily create an appearance of improper influence or a conflict of interest. You may accept gifts, business entertainment or other offers from a third party only as allowed by policy (see Gifts and business entertainment section below).

### **Outside employment or compensated board service**

Our primary employment obligation is to Cambia and its affiliates. Any activities such as a second job or personal business must not conflict with those obligations. An example of outside employment that does not relate to Cambia's business and would not create a conflict would be working as a restaurant server at times when you are not expected to be working for Cambia. An example of a job that would create a conflict would be if you work at one of the health plans and take a second job at a competing health plan.

You may not use company time, name, influence, assets, facilities, materials or the services of other employees for or in connection with any outside employment or other activities. To ensure you avoid a potential conflict, you should notify your manager prior to accepting any outside employment. On an annual basis or as soon as possible when your circumstances change, disclose on your Conflict of Interest Disclosure statement all your outside activities, financial interests or relationships that may present a conflict or the appearance of one.

Volunteer board service with non-profits is encouraged and supported by Cambia. In contrast, a compensated board position with an entity that operates in Cambia's industries creates a conflict that may prohibit you from accepting the position while working at Cambia. You must obtain approval from Ethics before taking any outside compensated board position so that potential conflicts may be considered.

Additional guidance for health care professionals who wish to pursue outside employment within the health care field can be found in our [Supplemental Outside Employment Guide for Medical and Health Care Professionals](#).

## **Gifts and business entertainment**

Cambia recognizes that gifts and business entertainment may occasionally be appropriate in building and maintaining effective business relationships. However, gifts and business entertainment can easily create an appearance of improper influence. You must always exercise good judgment, discretion and moderation when accepting or offering gifts and business entertainment.

Do not accept gifts or business entertainment from outside parties, such as suppliers, potential suppliers or members, that might compromise or appear to compromise your ability to make objective and fair business decisions.

When offering gifts or providing entertainment, you must avoid doing anything that may create a perception that Cambia is trying to inappropriately influence another party. Your manager, in consultation with the Ethics department, must approve exceptions to the standards in this section. Some departments may have policies for gifts and business entertainment that set stricter limits. If you work in such a department, follow your department's policies and procedures.



## Accepting gifts

The following standards apply when accepting gifts:

- You may never accept a gift if it will influence your business decisions.
- You may accept a gift valued at less than \$200. The value of all gifts received from any one source in a 12-month period cannot exceed \$400.
- Even if a gift falls within the dollar threshold, it must be reasonable and moderate in the context in which it is being offered.
- You may never accept cash or a cash equivalent, such as a check, money order or gift card issued by a bank or other financial services institution.
- You may never accept an honorarium.
- You may never accept a personal discount that is not widely available to other Cambia employees.
- You may never ask an external business partner to provide a gift.
- You may never accept a gift as part of a business negotiation.
- You may never agree to do anything in exchange for a gift.
- You may never accept a gift of any value from a member or provider.

## Accepting business entertainment

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The following standards apply when accepting business entertainment:

- You may never accept business entertainment if it will influence your business decisions.
- The person offering the business entertainment must participate in the activity. If not, the entertainment is a gift and is subject to the gift standards.
- Business entertainment must have a business purpose that provides a benefit to Cambia.
- All costs related to business entertainment must be reasonable and moderate.
- You may never ask an external business partner to provide business entertainment.

## Q&A

### How can I determine when a gift or business entertainment is reasonable and not excessive?

Ask yourself whether the gift appears to be excessive to you personally and whether it would appear excessive to others. Below are some examples of both reasonable and excessive gifts.

#### Reasonable

- A holiday gift of a bottle of wine from a supplier, vendor or customer
- Tickets to a local sporting or cultural event
- A coffee mug with a provider, vendor or supplier logo on it
- A small, inexpensive picture frame

#### Excessive

- A case of fine champagne
- Tickets to a distant sporting event, plus airfare and/or lodging for you and a guest
- Cash or monetary equivalents, including loans, stocks or stock options
- A lavish gift, such as jewelry

### Offering gifts

When offering gifts, you must avoid doing anything that might create a perception that Cambia is trying to inappropriately influence another party. You may offer a gift only if the following standards are met:

- The gift does not violate any law or regulation or the standards of conduct of the recipient's organization.
- The value of the gift does not exceed \$200, and the value of all gifts offered to any one recipient in any 12-month period does not exceed \$400.
- Even if a gift falls within the dollar threshold, it must be reasonable and moderate in the context in which it is being offered.

- The gift does not consist of cash or a cash equivalent, such as a check, money order or gift card issued by a bank or other financial services institution.
- The gift is not offered as part of a business negotiation.
- Offering gifts should focus on relationship building and not create undue influence, establish an expectation for repayment or compromise the recipient's objectivity.

### Offering business entertainment

When providing business entertainment, you must avoid doing anything that might create a perception that Cambia is trying to inappropriately influence another party. The following standards apply when offering business entertainment:

- Offering business entertainment must not violate any law or regulation or the standards of conduct of the recipient's organization.
- Business entertainment must have a business purpose that provides a benefit to Cambia.

- The person offering the business entertainment must participate in the activity. If not, it is a gift and subject to the standards of offering gifts.

Notwithstanding the above, some departments might have additional requirements that you need to follow. In particular, Medicare has additional rules in this regard. There are important limitations on giving gifts to Medicare members and employees of the Centers for Medicare & Medicaid Services (CMS). We are committed to full compliance with CMS regulations. Make sure to contact our Medicare compliance staff before giving any Medicare-related gifts.

Additional information regarding gifts and business entertainment being offered to or accepted from government officials can be found in the [Interacting with the Government](#) section.

## Raffles and prize drawings

Cambia recognizes that employees may have the opportunity to participate in or provide raffles and prize drawings at industry conferences and events. You must always exercise good judgment, discretion and moderation when accepting or offering raffles and prize drawings.

### Participating in raffles and prize drawings

You may enter raffles or prize drawings at industry conferences and events if all of the following conditions are met:

- The event is a legitimate giveaway open to all attendees.
- All participants have an equal opportunity to win.
- The prize value is reasonable and appropriate for the occasion.
- The prize does not consist of cash or a cash equivalent, such as a check, money order or gift card issued by a bank or other financial services institution.
- Winning the prize does not create any obligation to use the sponsor's services, provide business to the sponsor or give the sponsor preferential treatment in business decisions.

### Sponsoring raffles and prize drawings

When Cambia sponsors a raffle or prize drawing, you must ensure:

- The event is structured as a legitimate giveaway.
- All eligible participants have an equal chance to win.
- Prize values are reasonable and moderate in the context of the event.
- Prizes do not consist of cash or cash equivalents.
- Winning does not create any obligation for the recipient.

If you are uncertain whether a raffle or prize drawing meets these standards, contact Ethics for guidance before participating or sponsoring.

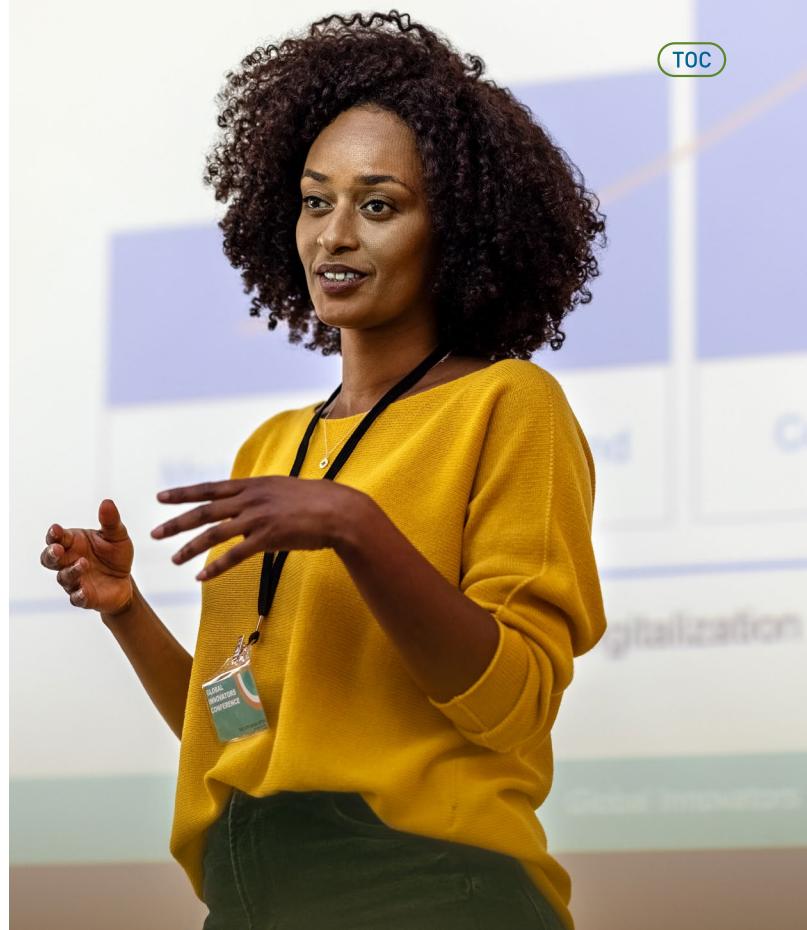


## Travel, conferences and fees

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We prohibit any outside entity or individual, including people or companies who do business or seek to do business with Cambia, to pay your expenses to attend a conference or seminar. This includes any offers of discounted conference fees; reimbursement for travel, meals or lodging; or offers of gifts or prizes. Cambia will reimburse you for your attendance at a conference or seminar if there is a business reason for you to attend and if you have received prior approval from your supervisor.

If you are presenting or speaking at a conference or seminar, generally the conference or seminar fee can be waived if the fees are also being waived for other presenters or speakers. In such instances, only the registration fee can be waived. All other costs, including travel, meals and lodging, must be paid for by Cambia. If you are not sure the event (e.g., conference, seminar or training) falls within this guideline, please review the [Supplemental Conference Policy](#) for further guidance or contact Ethics.



## Political activity and contributions

Cambia is an active participant in the political process at both the federal and state levels and encourages you to vote and be active in the political process outside work. At times, Cambia will seek to engage you, our members and other business partners on political and public policy issues. You are not obligated to participate. Unless you have received prior approval from a director or above within the Public Affairs & Policy department, you must clearly represent that political activities and public policy discussions you engage in are being done in your capacity as a private citizen rather than as a representative of Cambia.

Cambia sponsors a political action committee (PAC) for federal elections. Except as allowed under a specific exception for PAC activity, it is unlawful to use company money in connection with federal elections.

When volunteering in political fundraising or other political activities, do not do any of the following:

- Ask or require any Cambia employee to assist with political activities
- Ask or require any Cambia employee to make a political contribution of any kind to any political candidate
- Collect political contributions on company property
- Conduct the activity on company time or with company equipment
- Type letters and political communications while at work
- Use a Cambia return mail or email address or a Cambia business telephone number
- Use Cambia stationery, postage or email systems

# Respecting and protecting each other

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## Equal employment opportunity and non-discrimination

From the chief executive officer to frontline supervisors, Cambia is strongly committed to equal employment opportunity in all of its employment practices. Leadership recruits, employs, trains, transfers, promotes, pays, uses corrective action, lays off and terminates employees solely on the basis of individual qualifications, conduct and merit. Cambia does not tolerate discrimination or harassment based on any of these factors.

View our [Equal Opportunity/Non-Discrimination Policy](#) and contact your HR representative with additional questions.



### **It takes all of us working together to create the kind of culture we want to have at Cambia.**

It's important that everyone understands that they are not allowed to base employment decisions on, or treat people differently, because of their legally protected characteristics, like race, gender, national origin, religion, or sexual orientation.

## Workplace violence

Cambia is committed to working with its employees to promote and maintain a work environment free from violence, threats of violence, harassment, intimidation and other disruptive behavior.

Violence, threats, harassment, intimidation and other disruptive behavior in our workplace will not be tolerated. All reports of incidents will be taken seriously and will be dealt with appropriately. Such behavior can include oral or written statements, gestures or expressions that communicate a direct or indirect threat of physical harm. Individuals who commit such acts may be placed on immediate, paid administrative leave.

You're expected to report any incidents to management or HR. Do not ignore violent, threatening or inappropriate behavior. In the event of an immediate threat, make no attempt to control the threatening person but instead leave the area, notify others who may be at risk, and call 911 or building security.

View our [Workplace Violence Policy](#) and contact your HR representative with additional questions.

# Safeguarding information, property and assets

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You are expected to protect the company's confidential and proprietary information. You must use confidential and proprietary information only as necessary to complete your work and not for personal gain or non-business use. This 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.

Confidential information may be disclosed to others, internally or externally, only if it is properly authorized, the recipients have a clear business need for such information and it is shared in accordance with Cambia's policies. Pay close attention to information shared externally on digital channels, like social media, as these types of posts are not private, may live online indefinitely and could be shared by others without your consent. For more information, please refer to [page 21](#). All confidential information must be handled with care to avoid inadvertent or careless disclosure.

Examples of proprietary business information include:

- Business forecasts and/or strategies
- Financial data and projected earnings
- Internal employee communications
- Member and group information
- Planned geographical expansion
- Provider contracts
- Sales figures
- Wage and salary data



Follow these guidelines for protecting confidential and proprietary information:

- If you have access to confidential and proprietary information, discuss it with others 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 proprietary information in social conversations or in normal business dealings with others outside the company.
- Do not discuss confidential and proprietary information in a place where you may be overheard.
- Do not take confidential and/or proprietary information in any form or for any reason when your employment has ended.

## Using company assets

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We must ensure and safeguard the assets of our company. Company assets include both company funds and property. They also include every physical item and electronic system as well as liquid assets, such as cash, checks, credit cards and wire transfers.

Examples of company assets include the following:

- Buildings, furniture and fixtures
- Cash, checks and credit cards
- Company time
- Computer hardware and software
- Documents, data and records
- Email, internet and intranet access
- Fax machines and copiers
- Intellectual property
- Office supplies (e.g., paper, pens, paperclips, staplers)
- Proprietary information
- Telephones and cell phones

Company assets may not be used for:

- Any illegal activity
- Communications that are threatening or intimidating
- Creating, viewing, receiving, sending or downloading chain emails, including jokes
- Harassment of any type
- Personal gain
- Sexually explicit materials
- Solicitation of personal business
- The public advancement of personal views
- The sale of any services or products other than Cambia's

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 personally accountable for 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 personally responsible for maintaining the appropriate documentation regarding the use of company funds.

Email, the internet, our intranet, telephones, voicemail, instant messaging, faxing and other electronic means are company assets to be used for legitimate business purposes or for purposes authorized by management.

You do not have an expectation of privacy in the electronic messaging systems used during your employment. Cambia has the right to review, copy, audit, investigate, intercept, access and disclose any use of your computer, email, instant messaging, telephone and internet systems, including messages created, received or sent for any purpose. The contents of electronic storage (e.g., email, instant messaging) may be disclosed within the company for legal matters and to governmental agencies without your knowledge or permission. Access by management is permitted without your consent and without giving prior notice.



## Q & A

**In the hybrid work environment, I transport my Cambia laptop back and forth to the office along with other remote working locations, such as a coffee shop or airport when traveling for business. How can I protect Cambia's data and information outside of the office?**

When you are moving your Cambia laptop to locations outside of the office, you are responsible for keeping your devices with you at all times. Never leave your laptop in your vehicle or on a public table for any amount of time. You should also make sure that you are logging off your laptop, and password protecting and storing all your devices in a secure location when they are not in use.

## Recording and reporting information

Cambia relies on you to make sure that our records are true, accurate and complete based on Cambia policy and any applicable contractual, legal and accounting standards. Failure to do so may lead to enforcement actions under various state and federal laws.

For example, Cambia's subsidiaries engage in a variety of business activities involving federal funds. The False Claims Act (31 U.S.C. §§ 3729–3733) prohibits submitting false records that result in payments (or overpayments) from the federal government, as well as understating or concealing moneys owed to the federal government. You must exercise due diligence to detect errors in payments involving federal funds. Those errors must be promptly disclosed to the federal government and corrected. Violations of the False Claims Act may be subject to both civil and criminal penalties.

To help protect our organization, please manage Cambia's records—including creation, storage, retention, and disposal—according to our [Records and Information Management](#) and [Records Retention Policies](#). You must not withhold information from, mislead or improperly influence Cambia's internal or independent auditors, legal counsel, Ethics and Compliance officers or others acting in a similar capacity on behalf of Cambia.

## Social media

Social media is a powerful medium for connecting with consumers, clients, employees and community stakeholders. While these channels are valuable to our customers and help advance our brands' reputations, they can also be problematic. We have developed a social media policy to protect our customers, employees and the Cambia family of companies. The policy applies when employees participate in social media for work but should also be considered if personal social media activities may give the appearance of speaking for or about Cambia and its related companies and subsidiaries.

### For employees:

Participating in social media activities at work should not be excessive or interfere with your workplace responsibilities. Employees should have no expectation of privacy in the use of Cambia equipment and communication and information sent through Cambia equipment or systems.

### Live Cambia values

Always express ideas and opinions in a respectful manner. Make sure your communications are professional and in good taste.

Be sensitive about linking to content. Redirecting to another site may imply an endorsement of its content. Do not denigrate or insult others, including competitors.

### Be yourself. Be transparent.

Even when you are talking as an individual, people may perceive you to be talking on behalf of a Cambia company.

If, in your job responsibilities, you speak externally on behalf of the company or otherwise have a role that engages with Cambia's stakeholder public (e.g., media, public policy, community or business groups), you may be seen as the company spokesperson when posting on social media. Please consider your role at the company, even when posting on personal accounts.

If you discuss topics related to Cambia businesses, be up front and explain what company you work for, so your relationship to the topic is transparent to users. Disclosure on social media is everyone's ethical responsibility and it's important to uphold truth-in-advertising policies.

If you are not an official company spokesperson, please add a disclaimer to your social media profiles indicating that your personal posts are your own. (For example, "The opinions and positions expressed here are my own and may not reflect those of my employer.")

Authorized use of companies' logos and trademarks in communications are permissible when adhering to the predefined brand guidelines.

You are personally responsible (and potentially liable) for any content you publish.

For more details, please review Cambia's [Social Media Policy](#).

## Business relationships with suppliers

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Cambia seeks to partner with those who share our values and ethical standards. We also select business partners who will provide goods and services that best meet Cambia's needs. We ensure fair dealing is the foundation for our relationships and business transactions.

Contracts with suppliers and producers must be in writing and must describe the services to be provided and the basis for payment. Payment must be appropriate to the value of the services rendered and reasonable in view of the practice in the industry or trade.

We choose to partner with suppliers who offer us the best value in terms of quality and price. When working with suppliers, be sure you:

- Select the supplier that will best serve Cambia's needs and interests without regard to any personal relationships or personal interests.
- Weigh all the facts impartially and objectively when selecting among competing suppliers, regardless of the size of the service or order.
- Do not exercise inappropriate bias when selecting suppliers or potential suppliers of goods or services.
- Do not require a supplier to become a customer as a condition to becoming or continuing to be a supplier to Cambia.
- Do not share confidential information provided by one supplier (e.g., price, terms or conditions) with another supplier.

## Fraud, waste and abuse

If you suspect or discover fraud, waste or abuse by employees, contractors, agents, providers or members, please report your concern immediately. Follow the link to the [Special Investigation Unit's Spark page](#) for more information.

Health care **fraud** is any intentional misrepresentation of a material fact or obtaining something to which you or someone else is not entitled. Examples include:

- Billing for services not furnished
- Billing for non-covered services as covered items
- Incorrect reporting of diagnoses or procedures to maximize payments
- Misrepresentation of dates, descriptions of services or identities of subscribers or providers

**Waste** includes any practices that are inconsistent with sound fiscal, business or medical practices and that result in inefficiencies or unnecessary cost. An example of waste is seeking payment for unused or contaminated portions of medical supplies or operational error.

**Abuse** is a deception or misrepresentation that a company or person should know is false or improper and that can result in an unauthorized benefit to the company or person. Abuse cannot always be easily differentiated from fraud. It's identified by specific facts and circumstances, intent, prior knowledge and available evidence, among other factors.

## Improper payments

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An improper payment to gain advantage in any situation is never acceptable. Cambia prohibits improper payments such as bribes or kickbacks.

You may, from time to time, engage in transactions involving offshore companies. The Foreign Corrupt Practices Act (FCPA) is a Federal law that forbids any U.S. person or company from giving anything of value to foreign officials to obtain or keep business, or gain any other improper advantage. These actions are prohibited whether made directly or through a third party or their agent.

A “foreign official” is defined very broadly under the FCPA. The official can be an employee or agent of a foreign government and does not need to be high-ranking.

You are expected to use care and report any concerns relating to the FCPA and all applicable anti-bribery/anti-corruption laws. Examples of red flags include:

- Money or anything of value is being offered to an official of a foreign government such as gifts, entertainment, travel, or offers to employ officials or their relatives or connections.
- A third-party supplier or its agent is selected without a clear reason or with the intent to provide services not within their scope.
- A third-party supplier or its agent is related to, employs, or is connected with current or former government officials.
- A third-party supplier or its agent is vague or confusing about the nature of its relationship with/reliance on other entities or agents.
- A third-party supplier or its agent has frequent or disproportionate travel or entertainment expenses.
- Third-party invoices include charges for services not included in the scope of work.

## Insider trading

In your job, you might learn of non-public information about a publicly traded company with which Cambia invests or does business. There are restrictions on what you can do with this kind of information, such as sharing it with others or making personal financial decisions. You are responsible for knowing and understanding those restrictions and for maintaining non-public information.

Not sure what to do? Ask before sharing.

Examples of insider trading include sharing the following non-public information:

- Financial results or company performance
- Marketing strategies
- A merger, big purchase or sale
- Personnel changes
- Research, development, or new product information.



Please also see the [Supplemental Policy on Personal Financial Interests and Investments](#).

## Artificial Intelligence

Cambia strives to apply Artificial Intelligence (AI) in a way that serves our members, meets the expectations of customers and regulators, considers risks as well as benefits, and is consistent with our Cause and Values. All Cambia employees are expected to follow Cambia's [Responsible AI Policy](#).

# Interacting with the government

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Cambia has several guidelines for interacting with the government.

## Government programs

Our government relationships are important. Our credibility, reputation and value as a trusted partner are intrinsically connected to these relationships. As a result, we hold ourselves accountable to follow all state and federal rules and guidelines that govern these relationships. Moreover, we approach each relationship with thoughtful regard for circumstances and avoid even the appearance of conflict of interest.

Our government relationships related to Medicare, FEP and exchange, regulatory, legislative and other public programs or offices require constant vigilance and a commitment to compliance. You may never pay a contingent fee to any person or company to solicit or obtain government contracts or to influence or attempt to influence a government employee in connection with the award or modification of any government contract.



## Employment of government personnel

There are laws and regulations that govern recruiting and hiring government personnel. These rules apply to personnel hired by the company, as well as Cambia'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 Cambia, consult with HR.

## Confidential information

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. 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 to influence or attempt to influence a government employee in connection with the award or modification of any government contract.

## Submitting proposals, budgets and other reports

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Proposals, budgets and other important reports and records that Cambia furnishes to the government must meet significant record-keeping rules 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 False Claims Act. The False Claims Act 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 or other federal health care programs.

## 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.

## Accepting 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.

## Offering gifts or business entertainment to government employees

There are specific laws and regulations that apply to offering gifts to government officials or employees. You must follow all state and federal laws and guidelines pertaining to gifts. When working with employees of a government 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 nominal onsite business courtesies.





## Important notice

This Code is meant to be read in conjunction with other Cambia policies and procedures, including those found in the Employee Handbook and any other Cambia manuals, instructions and directions, as applicable. Nothing in the Code creates a contract between Cambia and any employee or Cambia and any other person, creates legally enforceable rights or promises specific treatment in certain situations. Unless otherwise stated in a contract or other Cambia directive, the Code does not modify your at-will employment relationship or contractual relationship with Cambia, as applicable.

Cambia reserves the right to modify the Code at any time it deems appropriate. The most current version is always available on Spark and other Cambia websites.

**If you have any questions about the Code, please contact Ethics.**

# Resources

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<b>Anonymous Reporting Line</b>	To report an ethical or compliance concern anonymously	1-888-384-3577
<b>Ethics</b>	For questions or concerns related to expectations of the Code or what constitutes a conflict of interest, or to report an ethical concern	<a href="mailto:eco@cambiahealth.com">eco@cambiahealth.com</a> 1-888-384-3577
<b>Compliance</b>	For questions or concerns related to: <ul style="list-style-type: none"><li>• Medicare compliance</li><li>• Any other compliance issues</li><li>• Privacy and HIPAA compliance</li></ul>	1-877-878-2273
<b>Fraud, Waste and Abuse</b>	To report potential fraud, waste and abuse	1-800-323-1693
<b>IT Security</b>	To report suspected security incidents	1-877-372-8223
<b>Human Resources</b>	For questions or to report a concern regarding a Human Resources issue or items in the <a href="#">Employee Handbook</a> , including, for example, equal employment opportunity/non-discrimination concerns or workplace environment concerns such as drugs and alcohol, weapons or tobacco.	1-888-224-7491 <a href="mailto:EmployeeRelationsEmailAddress@cambiahealth.com">EmployeeRelationsEmailAddress@cambiahealth.com</a>
<b>Records and Information Management</b>	For questions or concerns related to records management, storage, retention requirements and destruction	<a href="mailto:CRMO@cambiahealth.com">CRMO@cambiahealth.com</a>

- Audit and Compliance Committee Chair of the Cambia Board of Directors  
For concerns or complaints about an accounting, internal controls or auditing matter:  
1-888-655-5452 | [auditchair@cambiahealth.com](mailto:auditchair@cambiahealth.com)
- [Non-Retaliation Policy](#)
- [Supplemental Policy on Personal Financial Interests and Investments](#)
- [Supplemental Outside Employment Guide for Medical and Health Care Professionals](#)
- [Supplemental Conference Policy](#)
- [Equal Employment Opportunity/Non-Discrimination Policy](#)
- [Workplace Violence Policy](#)
- [Communications Policies](#)
- [Special Investigation Unit's Spark page](#)
- [Supplemental Policy on Personal Financial Interests and Investments](#)



# Code of Business Conduct



Reviewed and updated December 2025