

HealthPartners UnityPoint Health

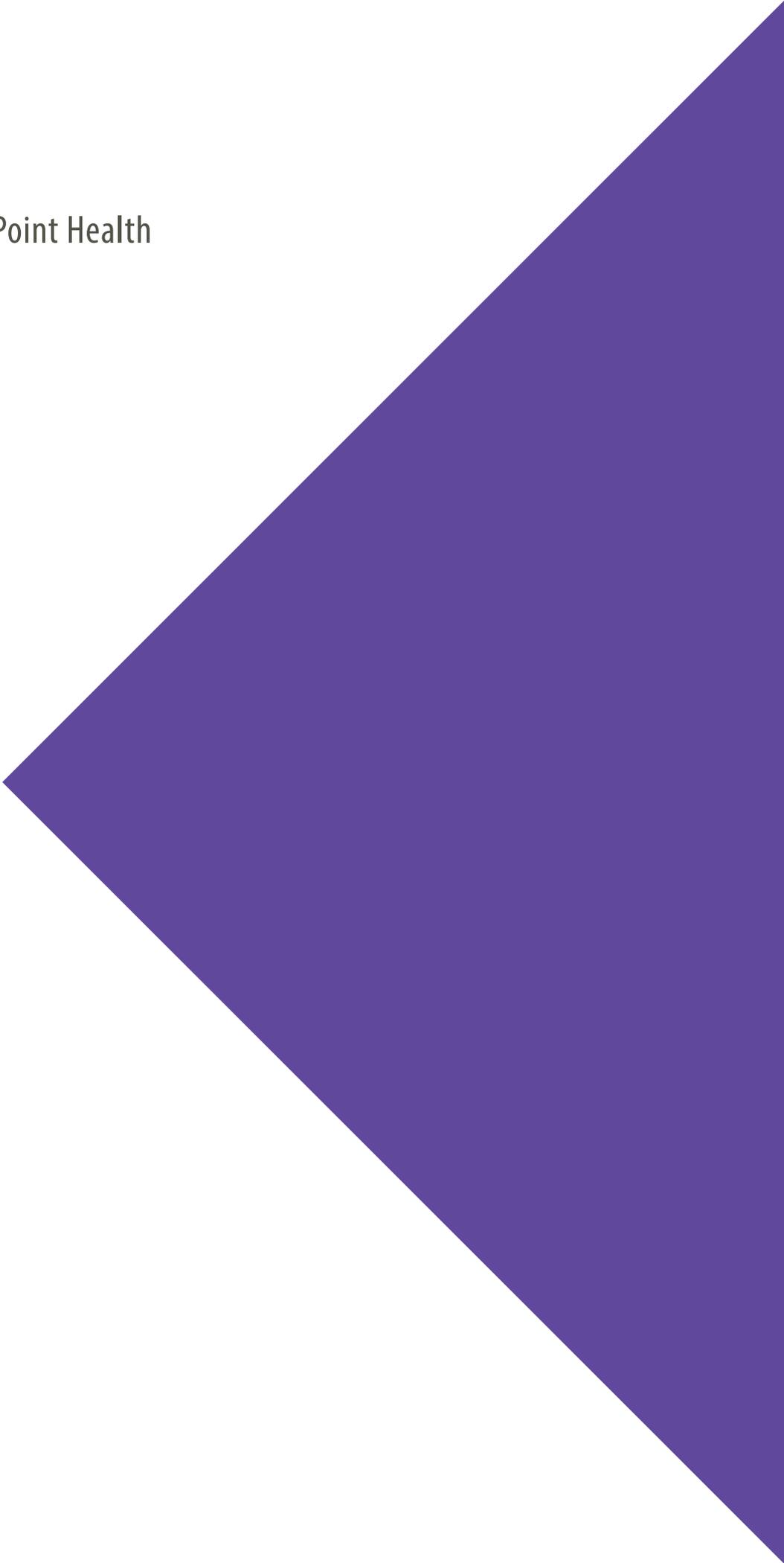


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Introduction

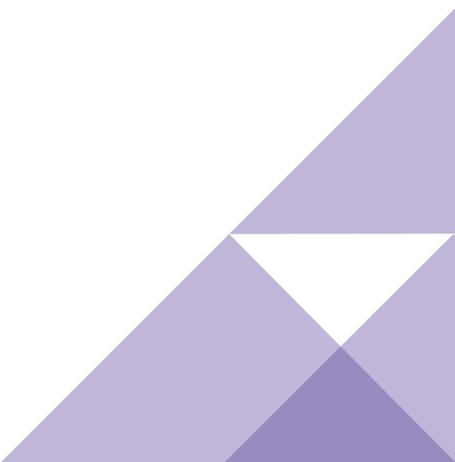
Every day, we work together for those we serve. We do work that has such an important impact on the lives of others. Our members and their families trust us with the most important and personal elements of their lives, and every interaction we have is an opportunity to earn that trust or lose it.

We hold ourselves to high standards by following the law, regulatory requirements and acting with integrity. That's why we have a Code of Conduct: it shows us how to do our work with integrity. It helps us stop and think: What's the right thing to do? And it helps us find answers to that question.

The HealthPartners UnityPoint Health, Inc. Code of Conduct is your resource for finding answers to important questions and doing the right thing. It applies to all personnel who represent the organization. These are our colleagues, and all colleagues here are expected to follow our Code of Conduct.

It is important for you to read our Code of Conduct, understand it, and use it in your work. Ask your leader if you have questions – or use the many great resources we have in our organization to help you find the answer.

Thank you for knowing and using our Code of Conduct.



Resource Guide

HealthPartners UnityPoint Health (HPUPH)

The Code of Conduct is a resource to look to when we wonder, “What’s the right thing to do?” Below is important contact information to help personnel answer that question. As you read, ask questions, and use the Code of Conduct in your daily work please know that these resources are here for you. The Code of Conduct applies to anyone acting on behalf of the organization, including; staff and leaders of affiliate organizations, Board members, Compliance Committee members, contractors, and volunteers. We refer to all of these individuals as “personnel” in this Code of Conduct.

Reporting a concern or asking a question

If you aren’t sure about where to go, here are good places to start:

Integrity and Compliance hotline

1-866-444-3493

(call this number if you want to report your concern anonymously)

Integrity and Compliance email

integrityandcompliance@healthpartners.com

Privacy email

privacy@healthpartners.com

Compliance Officer

Steve Bunde

952-883-6541

steven.d.bunde@healthpartners.com



Accountability

Our Commitments

We apply the Code of Conduct and other organizational standards and policies fairly and consistently. If these important expectations aren't followed, we respond appropriately.

Everyone's Commitments

- Follow the law.
- Use the Code of Conduct and other resources from the organization to help you make the right decisions.
- Know that a violation of your responsibilities, as explained in the Code of Conduct — or a violation of other organizational standards and policies and applicable laws — can result removal from administering the organization's business.
- Know that if you do something illegal or unethical, we may make a referral to law enforcement or to professional boards or licensing organizations.

Leaders' Commitments

- Foster a culture of integrity and compliance; model that behavior.
- Make sure that personnel you lead understand their responsibilities under the Code of Conduct and other organizational standards.
- Create a work environment where everyone feels comfortable asking questions and raising concerns without fear of retaliation.
- Evaluate personnel's performance in light of the Code of Conduct and other organizational standards.
- Don't encourage, direct or tolerate violations of the Code of Conduct, other organizational standards or principles of sound judgment. Never tolerate a violation of the law.
- If you see or hear of inappropriate behavior, including retaliation or retribution, act quickly to address it.
- Take the concerns of the people you lead seriously; listen carefully and seek expert assistance from integrity and compliance, legal, finance, and human resources personnel if you need it.
- Don't retaliate against anyone for asking a question or reporting a concern in good faith.



Accuracy of Information and Reporting

Our Commitments

We make sure that the information we create, maintain and report is fair, accurate, complete and timely. We don't tolerate the creation of false or misleading records. We don't mislead others receiving or using our financial, quality or claims information, including cost reports and other government filings.

Your Commitments

- Follow the organization's system of internal controls, such as written standards, risk assessments and monitoring and auditing. These are designed to help you meet legal, financial, quality and other data reporting obligations and objectives.
- Cooperate fully with our internal and external auditors, who have responsibility for reviewing whether our financial statements and other records are presented fairly and accurately. Respond promptly, accurately and completely to our auditors' inquiries.
- If you find an error or other inaccuracy in our financial, quality or claims information — or in any other official report or record — bring it to the attention of your leader immediately.



I just discovered an error in a financial report that we submitted to a government agency two years ago. What should I do?

Mistakes happen, but when we find them we need to address them. Even errors in older documents and reports can have an impact on payment and care decisions now. If you find (or suspect) an error or inaccuracy, bring it to the attention of your leader right away. He or she will work with the Law and Integrity and Compliance teams to handle it appropriately.



Alcohol, Tobacco, Weapons and Controlled Substances in the Workplace

Our Commitments

We want people to work in a safe and healthy environment and do their work free from substances that could affect their skills and judgment.



E-cigarettes and chewing tobacco don't create secondhand smoke, so why can't I use them at work?

We prohibit the use of all tobacco and related products in your work places. Tobacco use is an enormous public health problem and we don't support its use anywhere.

Your Commitments

- Don't use alcohol or illegal drugs while working.
- Don't bring illegal drugs, weapons or other contraband to your workplace.
- Don't perform any of your job duties while under the influence of alcohol or illegal drugs or while misusing prescription drugs (this means using prescription drugs in a way that negatively impacts your performance or your judgment in your work). Anyone who appears to be under the influence of alcohol or illegal drugs while working on behalf of the organization, misuses a prescription drug and/or is involved in a drug diversion may be removed from administering the organization's business.
- Don't smoke or use tobacco or related products at work. Tobacco and related products include cigarettes, electric or "e-cigarettes", cigars, pipe tobacco and chewing tobacco.



Your workplace includes any facility that is owned or leased by the organization, in company vehicles or in private vehicles while they are being used for work. If you work from home, talk with your leader to understand how these restrictions apply there, too.



Business Information and Intellectual Property

Our Commitments

Our success depends in part on the unique nature of our services, products, systems and other business information. It's essential that we protect the confidentiality of our business information and respect the intellectual property rights of the organization and others.

Your Commitments

- Handle all confidential business information as carefully as you would handle member information — and your own personal information.
 - Only share business information outside the organization if that has been approved by your leader and the information is protected by a confidentiality agreement with the person receiving it.
 - Don't use or disclose confidential business information for personal gain or benefit, and don't share it with friends, family members or others in the community.
 - When your leader asks you, limit the information you share with colleagues.
 - Even after your association with the organization ends, keep the organization's business information confidential.
- If you're unsure if you should share the organization's intellectual property or other organizational information, ask your leader.
 - Don't use or make copies of the work of others outside the organization when you do your job without permission from the owner of the work, unless it is considered "fair use." Don't guess if you aren't sure what "fair use" is — to learn more about that, contact legal personnel.
 - When you write, invent, design or create something as part of your job, it belongs to the organization, unless another agreement, policy or law applies.



Business Information and Intellectual Property



Any business information or materials that are not publicly known should be considered confidential.

Here are just a few examples:

- *Business and marketing plans*
- *Customer information*
- *Education and training systems*
- *Financial information*
- *Pricing and costs*
- *Privileged information, such as communications with our attorneys*
- *Product development planning*
- *Proposals*
- *Quality data*
- *Strategic relationships and planned affiliations*
- *Technical and system specifications*
- *Many other things that are important to the organization and our strategic or competitive position*

Your responsibility to protect the organization's Confidential Information continues even after you leave the organization. Get your leader's permission before taking any materials or other work with you when you stop working here.



Conflicts of Interest and Secondary Interests

Our Commitments

We offer services to our members that are objective and based on the best available scientific evidence. The processes we use to make decisions about service and purchasing ensure that those decisions are free from the influence (or perception) of personal gain.

Your Commitments

- Make decisions about your work that are in the best interests of the organization and the people we serve.
- Avoid personal relationships and arrangements that could interfere, or appear to interfere, with your ability to do your work objectively and with independent judgment.
- Remove yourself from any purchasing or ordering decision if you have a personal interest in the outcome of the decision.
- Disclose all outside interests that involve health care, our competitors or our suppliers to your leader and as part of any organizational certification or disclosure process that applies to you.
- Treat your family members' personal and business interests as your own, and disclose them to your leader and part of the organizational certification or disclosure process that applies to you.

- If your outside interest is approved with a management plan, follow that plan and disclose any material changes to your leader.
- Follow organizational policies, procedures and other standards that relate to your outside interests, like the Code of Conduct standards related to gifts, entertainment, favors, meals and outside employment and consulting.



How do I know if I have a conflict of interest?

A conflict of interest occurs when your personal activities and relationships interfere with — or appear to interfere with — your ability to perform your work objectively and in the best interests of the organization and the people we serve. The standard for determining whether a conflict of interest exists is not whether you think it is a conflict of interest, but whether another, reasonable and objective person would consider it a conflict.



Contracting, Procurement and Purchasing

Our Commitments

Our members and customers count on us to use safe, high quality and affordable materials and services. To meet those expectations and to demonstrate sound business practices, we purchase and use goods and services based on objective criteria, such as price, quality, timely delivery, service standards and availability. We establish and meet supplier diversity standards in our purchasing practices. We don't do business with individuals or organizations that have been excluded from or sanctioned under federal or state health care programs or other federal or state contracts, or who have other restrictions on their eligibility to work with government contractors. And we maintain contracting and signature authority at the appropriate leadership level in the organization

- Before entering into a contract, consider legal issues, member privacy restrictions, data security requirements, sanctions and exclusions checks, quality and accreditation standards and sound business judgment. Follow applicable contracting and contract management standards to guide this work.
- If you are the "business owner" of an arrangement with a supplier or vendor, be accountable for ongoing oversight of the arrangement.
- Don't sign an agreement on behalf of the organization unless you have the authority to do so under our contracting or commitment policy.
- Don't accept gifts or anything else of value from current vendors or suppliers or from those being considered for future purchases

Your Commitments

- Act with integrity in negotiating and awarding contracts in all purchasing and service transactions.
- Make purchasing decisions based on criteria set by the organization.
- Make sure contractors and vendors know they are expected to comply with our organization's policies.



Contracting, Procurement and Purchasing



What do I do if I think a vendor is not performing to the terms of the contract?

Tell your leader about your concerns and work with him or her to determine what to do next. This may involve reviewing the contract itself, communicating with internal stakeholders and working with experts (such as legal, integrity and compliance, IS&T security and finance personnel). Don't jump to any conclusions immediately, but don't let time slip away. The sooner you address the problem with the vendor, the more protection for the organization and the people we serve.



Environmental Stewardship and Sustainability

Our Commitments

We form strong partnerships with our community. This often involves participating in community-building activities; and raising money to support health care, education, research, and other important community needs.

Your Commitments

When you do fundraising, charitable care or community benefit work on behalf of the organization, make sure that:

- Charitable events and solicitations we sponsor meet reporting and record-keeping requirements.
- Our organization's name is used as an event sponsor or when soliciting contributions only if the event or solicitation is authorized by an officer or the organization.

- Use your skills and passions to support charitable and other community causes that you care about. When you do personal fundraising and community work, keep your personal efforts and your work for the organization separate. This means:
 - Don't use organizational resources for personal activities.
 - Don't use your position, or anything you learn as part of your work, to solicit support from members or customers.
 - Don't use information about members or colleagues for personal activities.



Fair Competition

Our Commitments

We believe that a healthy competitive marketplace is good for members and the organization itself. We comply with antitrust laws and other laws that encourage fair trade and competition. We gather competitive intelligence in legal ways and respect the confidentiality of trade secrets.

Your Commitments

- When considering entering into an arrangement with another organization or person in the same line of business that we are in, consult with legal personnel to make sure the arrangement complies with applicable antitrust laws.
- If you're involved in trade group and professional association activities, consult with legal personnel to make sure you understand how antitrust restrictions apply in those settings.
- Gather information about competitors in a way that is sensitive to legal restrictions and our organization's standards for integrity; never misrepresent your identity, use improper influence or bribes or obtain competitive information in an illegal way. Talk with legal personnel to learn more.



Fraud, Waste and Abuse

Our Commitments

We work to prevent, detect and correct fraud, waste and abuse related to health care benefits paid by the government, employers or individuals. We routinely assess the risk that illegal conduct might occur, whether in our organization by subcontractors, or network providers. These assessments include reviews of claims, medical records, member satisfaction surveys, provider billing patterns, and other auditing, monitoring and outreach activities. When fraud, waste or abuse is identified, we address the issue through appropriate corrective action, which may include a report of our findings to the government and a refund or repayment of any undue payments. We take corrective actions against anyone engaged in inappropriate behavior, and we cooperate fully with regulators and law enforcement when the behavior of a colleague is suspect.

Your Commitments

- Participate in regular training to help prevent, identify, report and correct practices that may lead to fraud, waste or abuse.
- Comply with all state and federal laws and regulations aimed at preventing, detecting and responding to actions of personnel, members, vendors, customers or others who attempt to dishonestly benefit from government, employer, or individuals' payments to our organization.
- Take part in and cooperate with organizational activities to assess the likelihood or existence of improper activity, such as risk assessments, auditing, monitoring and investigations.
- Have legal personnel review agreements when required under our contract and commitment policy and our joint venture policy.
- Know that if you take part in fraudulent, wasteful or abusive activity, you will be subject to discipline; in some situations you may also incur personal liability and criminal penalties. If you're aware of or suspect conduct that could be fraudulent wasteful or abusive, report your concerns immediately. You can go to your leader, the Integrity and Compliance hotline or the Special Investigations Unit.



Fundraising, Solicitations, Charitable Care and Community Benefit

Our Commitments

We care for the places where we live and work so we can provide a healthier and cleaner community for our colleagues, members and future generations.

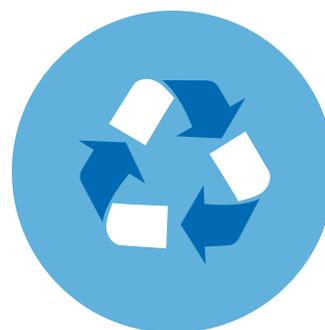
Your Commitments

- Use and dispose of resources mindfully, sustainably and as safely as possible.
- Whenever possible, reduce consumption of materials and energy. Reuse materials when safe and appropriate. Responsibly recycle or dispose of materials that can't be reused.



I have a great idea for how we can use fewer resources in my area. Who should I contact?

Share your idea with your leader, or send it to hpsustainability@healthpartners.com.



Gifts, Entertainment, Favors and Meals

Our Commitments

We won't be influenced by gifts, entertainment opportunities, meals or other offers from the people and organizations that we do business with. Likewise, we won't try to influence others' care or business decisions with gifts or other offers. We respond appropriately in situations where we're offered gifts or other tokens of appreciation from vendors, members, customers, competitors and others. And we use great care when offering items of value to people we want to do business with.

Your Commitments

- Don't solicit or accept gifts, entertainment opportunities, meals or favors from any supplier of goods or services. The organization may maintain "business courtesy" policies for limited business interactions of minimal value; talk to your leader before you accept a business courtesy meal or item.
- In addition, don't accept any item or service from any other type of vendor if it is primarily intended for your personal use or enjoyment. Any item or service that you accept must be intended and actually used primarily for professional, educational or business activities.
- Don't take part in leisure activities sponsored or paid for by someone we do business with, such as golf, sporting events, theater, "spa days," etc., unless it is a legitimate charitable event, or unless:
 - it's an occasional legitimate charitable event approved by your leader; or
 - you pay your own way and your participation would not compromise your independent judgment, interfere with your professional duties, or embarrass or damage the organization's reputation.
- Don't accept cash or cash equivalents (such as gift cards) from vendors or others, including members.
- Anything that you can't accept from a vendor is also not allowed for your immediate family (spouse, partner, parent, or child) to accept, unless it's part of their own work.
- Don't solicit or accept gifts, entertainment opportunities or favors from members. Small tokens of appreciation such as cards, flowers or candy may be accepted. If a member or their family wants to recognize you with other types of gifts or entertainment, you should direct them to a charitable organization.



Gifts, Entertainment, Favors and Meals

- Just as you can't accept gifts, don't seek to gain any improper business advantage through offering gifts, entertainment or other inducements to vendors, members or government officials. When you represent our organization, make sure that you also respect others' gift, meal and entertainment policies.



It's holiday time and I just received a gift basket from a vendor we work with. Can I keep it?

We'd prefer that our vendors show their appreciation and commitment to members in ways other than sending us gifts. But once the gift basket shows up, you need to do something with it. Here are appropriate options:

- Return the gift basket to the vendor with a note encouraging them to find other ways to support our community.
- Donate the gift basket to a local food shelf.
- If the contents are perishable, put the gift basket in a common area at work, but follow it up with a note to the vendor asking that in the future they find other ways to support our community.



Although gift-giving may be part of normal business and social practices in many settings, in health care it can present significant problems. Our members need to trust that the services we give them are based on sound, independent information, not gifts, favors or other items that we benefit from personally. It is well established that some suppliers of health care items, historically used promotional practices — such as gift giving, free trips and meals, and other activities — to inappropriately influence health care organizations. It is important to avoid these kinds of interactions — no matter how small or unimportant they may seem — in order to preserve member trust and your own independent judgment.



Government Officials and Government Inquiries

Our Commitments

We build and maintain effective relationships with public officials and government agencies. We deal fairly, openly and according to the law with public officials and government agencies in every state where we do business.

We respond to government reviews and inquiries in a timely and appropriate manner. We also stay actively engaged in public policy advocacy on topics that impact the work we do and the people and communities we serve.

Your Commitments

- If you receive a government inquiry or subpoena, let your leader know and follow your department's established process for responding. If your department does not have such a process, or if you don't know what steps you should take, get in touch with legal personnel immediately, and they will give you guidance.
- Never offer a gift, favor or anything else of value to a government official or representative. Anti-corruption rules that apply to our dealings with local, state, and federal officials are extremely strict, and we need to avoid any interaction that could be perceived as a bribe or other form of inappropriate influence. If you regularly work with government officials, make sure you understand the rules about interacting with them.

- Only represent our organization's views in front of legislative, regulatory or policy bodies if you have advance approval from your leader and from government relations personnel.



Some local officials are coming to tour our work area. Can we give them small items such as bumper stickers or t-shirts with our logo?

Most officials are prohibited from accepting any gift, even something as small as a cup of coffee. So the safest choice would be not to offer any gift at all. But if you feel this is important, check with legal or government relations personnel and they will give you direction.



Health Plan Operations

Our Commitments

We follow state and federal laws that govern commercial, government - sponsored and individual health plan operations.

Your Commitments

- Know and follow all policies and procedures applicable to health plan operations and your job.
- Because of the nature and complexity of health plan regulations, requirements can sometimes be confusing, but they're important. If you don't understand what's expected of you, ask your leader.



What kinds of health plan activities are regulated by law?

Nearly all health plan activities are regulated in some way. Here are a few examples of plan activities that come under state and/or federal regulation:

- Actuarial and underwriting practices
- Benefits design
- Care management
- Claims processing and payment
- Cost reporting
- Credentialing
- Data reporting
- Dental services
- Enrollment
- Financial solvency and investments
- Human resources
- Member services, including grievances and appeals
- Network management
- Quality assurance
- Pharmacy services
- Privacy and security
- Sales and marketing
- Utilization review



Information Security

Our Commitments

We protect information through security measures that maintain the confidentiality, integrity and appropriate availability of data. This includes the protected information of members and personnel, and confidential business information.

Your Commitments

- Comply with information security policies and procedures.
- Always communicate and send protected information in a secure way.
- Keep business and personal computing devices — such as desktops, laptops, tablets, smart phones, portable drives and any other digital device, including company cameras – secure and in your control.
- Make sure all computers and devices you use in your work are registered, approved and encrypted to organizational standards.
- Report any data security concerns immediately to the IS&T Support Center or the Help Desk.



Information Security

Essential Data Security Rules

1. Use strong passwords and never share them

Make your passwords hard for others to guess, but easy for you to remember so you don't have to write them down. And treat your passwords like your toothbrush — change them regularly and never share them.

2. Don't put protected information on your personal computers or devices

Use only company-approved and encrypted devices when you work with protected information. Never download or copy protected information to your personal computer or to any device that unauthorized people have access to.

3. Stay out of the cloud

Never download or back up information about members or personnel to the cloud without approval.

4. Protect against viruses

Delete emails with attachments or links from unknown and unexpected senders. Don't download software or media files from the internet to company devices without IS&T approval. "Spam" and "phishing" emails and infected files can release a virus into our network or trick you into giving the sender your own protected information, including your log in credentials.

5. Lock your monitor when you step away

Lock your computer screen by pressing CTRL+ALT+DELETE, then hit ENTER (or the Windows button and L). Don't change pre-set time-outs and lock-outs. When working in a member record, lock your screen even if you are just stepping away for a moment.

6. Secure emails with protected information

Never send member or personnel information outside the organization unless you use encrypted email or another company-approved security tool (Outlook's Secure Mail, TLS, or e-Transfer). Never send protected information to your personal email account, even if you think you are sending securely.

7. Don't go social

Don't use social media to communicate protected information.

8. Secure mobile devices

Never leave mobile devices (even encrypted ones) unlocked or unattended.

9. Report missing devices immediately

Report lost or stolen mobile devices to the IS&T Support Center (Help Desk) immediately. Don't delay even when you're still hoping it turns up.

10. Ask

If you aren't sure how to keep information or devices secure, talk to your leader or call IS&T security. They will get you additional guidance or training.



Licenses, Permits, Professional Qualifications and Professional Boundaries

Our Commitments

Our personnel will be qualified, eligible and licensed to provide the services they perform. Our business operations will have and maintain all required certifications and accreditations for federal and state health care program participation. We only assign and contract with people and organizations that are appropriately licensed, registered, certified and credentialed and are eligible to perform their work within the scope of their professional standing. We won't knowingly assign or contract with an individual or organization that is sanctioned by or excluded from any government program in which we participate.

- Tell your leader or the Integrity and Compliance personnel right away if you've been debarred or excluded from any government-sponsored healthcare or other contracting program, or if you're facing debarment, exclusion or other sanctions.
- Keep appropriate professional relationships with members and their families.

Your Commitments

- Keep your professional licensure, registration and other qualifications in good standing so that you are eligible to perform your work with the organization. This is true regardless of your role - medical director, disease or case manager, attorney, actuary or any other profession.
- Tell your leader right away if any professional action has been started or taken against you, such as a board inquiry, suspension, revocation, expiration or lapse of license or eligibility.



Licenses, Permits, Professional Qualifications and Professional Boundaries



Recently, a member I've worked with on several issues told me she is planning a trip around the world. She will be keeping in touch with her friends and family during her travels through a Facebook page. Can I "friend" her so we can stay in touch during her trip?

Although it's important to emotionally connect with the people we serve, it's not a good idea to pursue social contact with our members (or their families that you've come to know as part of your work). While your intentions may be good, you need to maintain clear boundaries between social and professional relationships. By "friending" members you could inadvertently send mixed messages about the nature of your relationship. So steer clear of socializing with members (in person and through social media). If in doubt, be sure to ask your leader for additional guidance.



Member Privacy

Our Commitments

We honor the trust that members and employers place in us by protecting their information.

Your Commitments

- Protect the privacy and privacy rights of members at all times, even after your (or their) affiliation with our organization has ended.
- Access, use and release protected information only as allowed by the organization's policies, procedures and other standards governing privacy and confidentiality.
- Make sure you understand all privacy expectations related to your work — both organizational standards and privacy laws. Some privacy laws can be complex, so make sure that you understand how those rules apply to your work and ask your leader questions if you don't understand.
- Don't look up or use member information for non-business reasons.



I see a lot of funny and touching stories from the members and families I work with, and I would love to be able to share them with my family. If I don't use any names can I talk to my family about my work?

You need to be very careful in this kind of situation. Even if you omit a member's name, you might inadvertently include some information about them that identifies them. The best approach is to not talk about specific member interactions or situations. If something funny happens at work, or if a member makes a strong impression on you, it's best to say something like "We had some good belly laughs at work today," or "I was really inspired by one of the people I was working with today." If you are questioning where to draw the line between what's private and what's not, talk to your leader — before you get close to that line. And always err on the side of privacy.



Privacy is about trust. All members, including those who are also personnel, should be able to trust us with their most personal information. Earn their trust: never look up or use a member's information without a valid business reason.



Member Privacy

Essential Privacy Rules

- 1. Don't look up or use anyone's information, except when you need it for your work.*
- 2. Use and share only the minimum amount of information you need to do your work.*
- 3. Don't release information to anyone outside the organization except if authorized by the member or as otherwise allowed by law.*
- 4. Keep safe all information that's within your possession or control and take every step to make sure that you don't lose information or allow unauthorized people to get access to it.*
- 5. Never talk about members with anyone who doesn't have a right to it — not your family, friends or any other unauthorized person.*
- 6. Never gossip about our members — even with your colleagues — and don't snoop in their records. It's disrespectful and illegal.*
- 7. Guard protected information as if it were your most cherished possession or personal secret.*
- 8. Report any privacy concern immediately to your leader or to integrity and compliance personnel.*



Member Rights

Our Commitments

The people we serve have the right to receive service from us that is safe, appropriate and respectful of individual and cultural differences. Members' spiritual and cultural values will play a part in the decisions they make about service and coverage.

We offer access to service equitably, without regard to race, marital status, gender, sexual orientation, gender identity, genetic information, national origin, language of origin, age, physical or mental disability, religion, veteran status or public programs status. We communicate with members in a way that is clear and understandable.

Your Commitments

- Don't discriminate in any way against members.
- Listen to and act on members' wishes about their services. Respect the choices they express in advance directives. Don't discriminate against members who haven't adopted advance directives. If, for some reason, we can't provide the services a member needs or requests, fully inform the member alternatives.
- Respect each member's spiritual and cultural values, and those of their family. Make sure to communicate with and provide services for them in a way that respects those values



Member rights may differ, depending on what health plan they are enrolled in.

Every health plan product is accompanied by a statement of member rights. To learn more about the rights of the members you serve, contact member services personnel.

Non-Retaliation

Our Commitments

We rely on all personnel to bring concerns forward when they believe that a violation of the Code of Conduct, the Integrity and Compliance Program, or any organizational standard or law has occurred. It's important for colleagues to feel safe in raising these concerns. We protect people from retaliation when, in good faith, they report a concern through internal reporting channels or to government agencies. The organization will take action against anyone that penalizes, ostracizes or harasses someone who has reported concerns honestly.

Your Commitments

- Report concerns and any behavior that you think violates the Code of Conduct, the Integrity and Compliance Program, any organizational standard or law. Do this in good faith as soon as you have a concern. You won't suffer any penalty, retribution, discrimination or adverse employment action for honestly reporting any known or suspected concern.
- If you are a leader, don't retaliate against anyone who raises a concern in good faith.
- Be aware that anyone who has been involved in inappropriate activity (including retaliation) may be removed from administering the organization's business.

- If you believe you've experienced retaliation for reporting a concern in good faith, contact human resources or integrity and compliance personnel.



I think that a process my work unit uses violates the law, but I'm not sure. If I report it and I'm wrong, what happens?

The organization will protect you when you raise a concern honestly, even if it turns out you were wrong. On the other hand, it's a violation of the Code of Conduct to knowingly make a false accusation. That's where the "good faith" part comes in: when you honestly believe that the information you are reporting is accurate, and your actions are well-intended, you'll be protected, even if it turns out you were wrong.



Outside Arrangements

Our Commitments

We make sure that outside arrangements by personnel don't compromise their judgment in work or their duties to the organization.

Your Commitments

- If you do — or are considering — any arrangements, discuss it with your leader.
- Disclose all details of the proposed arrangement before you agree to it, so that your leader can review and determine the appropriateness of the arrangement.
- If the outside arrangement is approved, follow any management plan your leader puts in place to ensure that the arrangement does not violate the Code of Conduct or organizational policies.
- Never use or disclose any organizational information (including member or confidential business information) or intellectual property as part of any outside arrangements.



Personal and Public Communications

Our Commitments

We communicate openly, honestly and in good faith with each other, those we serve and the community. We encourage colleagues to speak directly with their leaders when they have concerns about their work or any other issue related to the organization. In the age of social and interactive media — and emerging new ways to communicate — we remain committed to the basic expectation of communicating with integrity.

Your Commitments

- If you communicate about the organization or your work in a public setting or forum — in person, in writing, online, through social media, at a conference or in any other format — avoid using statements, images or recordings that could be viewed as unlawful, profane, discriminatory, threatening or hateful to another person or to an organization, including our organization, the people we serve, vendors, competitors or your colleagues.
- Always be clear in your public communications about whether you're speaking as an individual or on behalf of the organization — and only speak on behalf of the organization if you are authorized to do so as part of your job.

- Whether you're discussing your work in a public setting, such as at a conference, or in a personal setting, such as at home, always follow organizational policies on privacy, business confidentiality, social media, e-mail and internet usage and conflicts of interest.
- If you receive a call or contact from the media seeking a comment or information about the organization, contact communications personnel immediately.



Personal and Public Communications



A friend who blogs about health care asked if I would do a guest blog that gives an “insider’s view” of health care reform. I love to write, and I definitely have strong opinions about health care, especially the great work I see some of my colleagues doing. Can I do the guest blog?

You may, but you have to follow these rules:

- When you identify yourself, you may say that you work in health care, and what your role is in health care, but you may not say (or even hint at) what organization you work for.
- You must state that you are only speaking for yourself, not for the organization or your colleagues.
- Don’t identify your colleagues unless they specifically give you permission to do that.
- You may not use any member, family, customer or supplier information — even if you don’t think they would be identifiable. For example, you might want to tell an anecdote about a 67- year-old female member who had a great outcome with a hip replacement, but you need to make your description of her very generic: “Not long ago I helped a member who had a great outcome with an orthopedic procedure.”

Policies, Procedures and Other Work Standards

Our Commitments

We'll provide you with policies, procedures and other standards for how you're expected to do your work. All these standards — whether developed by the organization or your work unit — will be consistent and aligned with the Code of Conduct. They may be stricter or more detailed or specific than the Code of Conduct.

Your Commitments

- Understand and comply with the expectations for you and the work you do. You may need to complete training about a policy or other standard and how to follow it. Other times, your leader will expect you to read and understand the requirements on your own.
- Ask for help if you don't understand a policy, procedure or other standard that applies to you.
- Take action if you see or know of behavior or processes that aren't consistent with the Code of Conduct. In some cases, this can mean a simple and respectful reminder to a colleague. In other instances, it may be important to notify your leader, or human resources or integrity and compliance personnel.
- At all times, act according to the Code of Conduct. Make sure that all your work and decisions are in line with the requirements in our policies, procedures and other standards.



Record-Keeping, Record Retention and Record Destruction

Our Commitments

We create thorough, timely and truthful business records and other documentation, whether in paper, electronic or other formats. We maintain records in a secure environment and for the appropriate length of time. We destroy records only when and how it is legal to do so.

Your Commitments

- Keep accurate documentation needed for sound business practices and meeting requirements for accreditation standards, government-sponsored programs, timekeeping and other standards.
- Keep records for the appropriate length of time, which may vary based on the type of record. Follow the organization's record retention policy. Records should only be destroyed if the retention period in that policy has passed for that kind of record.
- If and when we no longer need to keep a record or other document, make sure to protect confidentiality when you throw it away. Any paper documents that have protected or otherwise sensitive information must be shredded or put in a locked shredder bin. Electronic files — and equipment that contains or stores information electronically — must be destroyed according to the organization's security procedures.

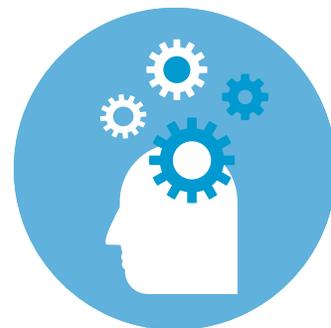
Training and Education

Our Commitments

We make sure that personnel receive appropriate training and education so that everyone knows what's expected of them in their work.

Your Commitments

- Complete required education and training on time. This is a condition of your continued relationship with the organization.
- Take advantage of additional learning opportunities — formal and informal, within and outside the organization.
- Ask your leader for help if you don't understand something that's covered in a training or educational materials.



Truthfulness and Cooperation

Our Commitments

We tell the truth; that's how we build trust with each other and with the people we serve. Everything we do is supported by honest words, honest documentation and honest action. We maintain open, constructive and professional relationships with all external partners, including regulators.

Your Commitments

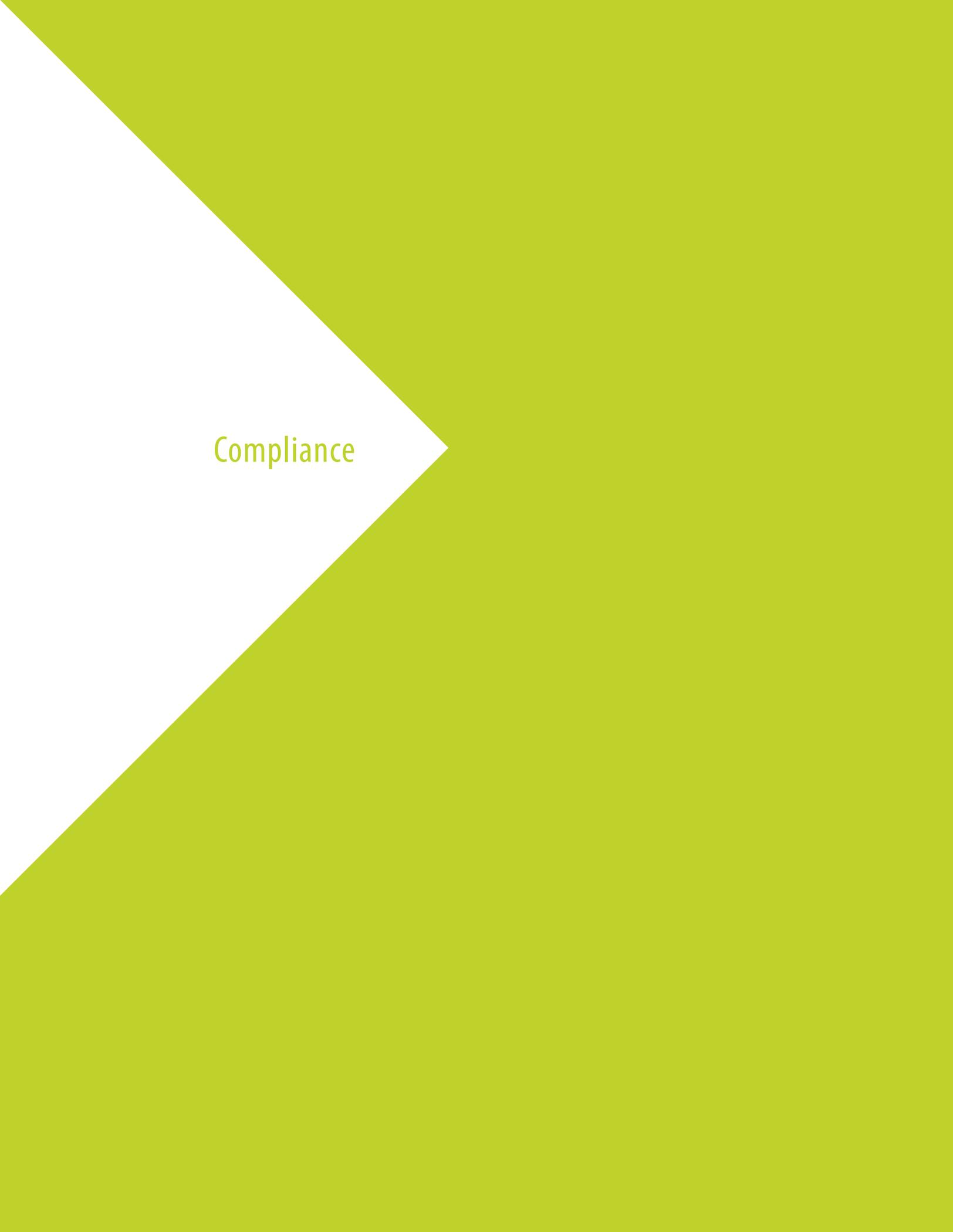
- Be truthful in your daily actions. This includes avoiding plagiarism and being honest in everything you do as part of your job, including your work product, and documentation.
- Be truthful when preparing or submitting a regulatory, accreditation or legal filing or certification or responding to an external inquiry on behalf of the organization.
- Cooperate with regulators, accreditation bodies, law enforcement and external auditors.
- Be truthful and cooperative when there is an inquiry or investigation led by someone in the organization, such as integrity and compliance, internal audit or legal personnel.
- Contact legal personnel immediately if, as a representative of the organization, you receive a summons, subpoena, inquiry or other communications from a court, law enforcement official, government agency or outside lawyer.



I just got a notice that says I need to be interviewed by a government investigator about a vendor we've worked with. This seems scary. What should I do?

Before saying yes to an interview, answering any questions, producing any documents, or even responding to requests about litigation or an investigation, you should contact legal personnel. This is true when the organization is involved directly, and when we are involved indirectly, such as investigations of vendors, customers or competitors.





Compliance

Integrity and Compliance Program

Our Commitments

Our organization has an Integrity and Compliance Program to help prevent, detect and correct violations of the legal, professional and ethical standards we're committed to upholding. The Integrity and Compliance Program is a resource for everyone in the organization. It consists of several elements:

- **Proper Oversight and Delegation** makes sure that personnel are informed about, and engaged in the Integrity and Compliance Program. We identify accountable individuals for overseeing, implementing, and managing the program, and we sure that organizational responsibilities are only delegated to qualified people.
- **Written Standards of Conduct** (such as this Code of Conduct and organizational policies and procedures) establish clear standards for how each of us is expected to act.
- **Education, Training and Awareness** help explain what is expected of each of us under this Code of Conduct, other organizational standards, the Integrity and Compliance Program, and in our daily work.
- **Reporting and Communication Channels** allow for open communication, so that everyone can ask questions and voice their good faith concerns in a safe, non-retaliatory environment. We maintain multiple channels for reporting, including an Integrity and Compliance Hotline that offers the option of anonymous reporting.
- **Objective Investigation** means that the organization reviews and takes seriously reported concerns.
- **Corrective Actions** are taken to fix concerns that have been identified through reporting channels, self-assessment or other means. Corrective actions are designed to address the identified concern and to prevent similar concerns in the future.
- **Self-Assessment**, such as auditing and monitoring, helps verify that we're keeping the commitments we've made to comply with the law and other standards. Self-assessment includes regularly assessing the effectiveness of the Integrity and Compliance Program.



Integrity and Compliance Program

Your Commitments

- Read and understand the Code of Conduct and the other standards that relate to your work.
- Complete all compliance-related trainings, disclosures and certifications on time. These let the organization know that you are committed to the Integrity and Compliance Program — and they're a condition of your continued good standing with the organization.
- Ask your leader questions if you don't understand what's expected of you.
- Report your concern if you see or hear about a business practice or other relationship that you think maybe illegal or improper. It's your responsibility to ask questions about any concerns you may have regarding any legal, compliance or ethical issues.
- Speak up right away when you have a question, before a situation becomes a violation of the law or places the organization or the people we serve at risk. Don't wait!



It happens to everyone: you're just not sure what to do in a situation at work. Maybe you're confused about the right thing to do, or maybe you feel strongly that what you're supposed to do is actually the wrong thing. Or maybe you just want to feel extra certain.

In these cases, ask yourself:

- *Is this behavior consistent with the Code of Conduct?*
- *Is it ethical?*
- *Is it legal?*
- *If I do this, will I be proud of myself and the organization?*
- *Would I want to read about this in the newspaper?*

If the answer to any of these questions is "No," then don't do it, and tell your leader about your concerns.

And if you still don't know, ask for help. There are many people in the organization that can help you work through difficult decisions.

- *Your leader — or your leader's leader — or any other leader you feel comfortable talking to*
- *Human resources personnel*
- *Integrity and compliance personnel*



Reporting Concerns

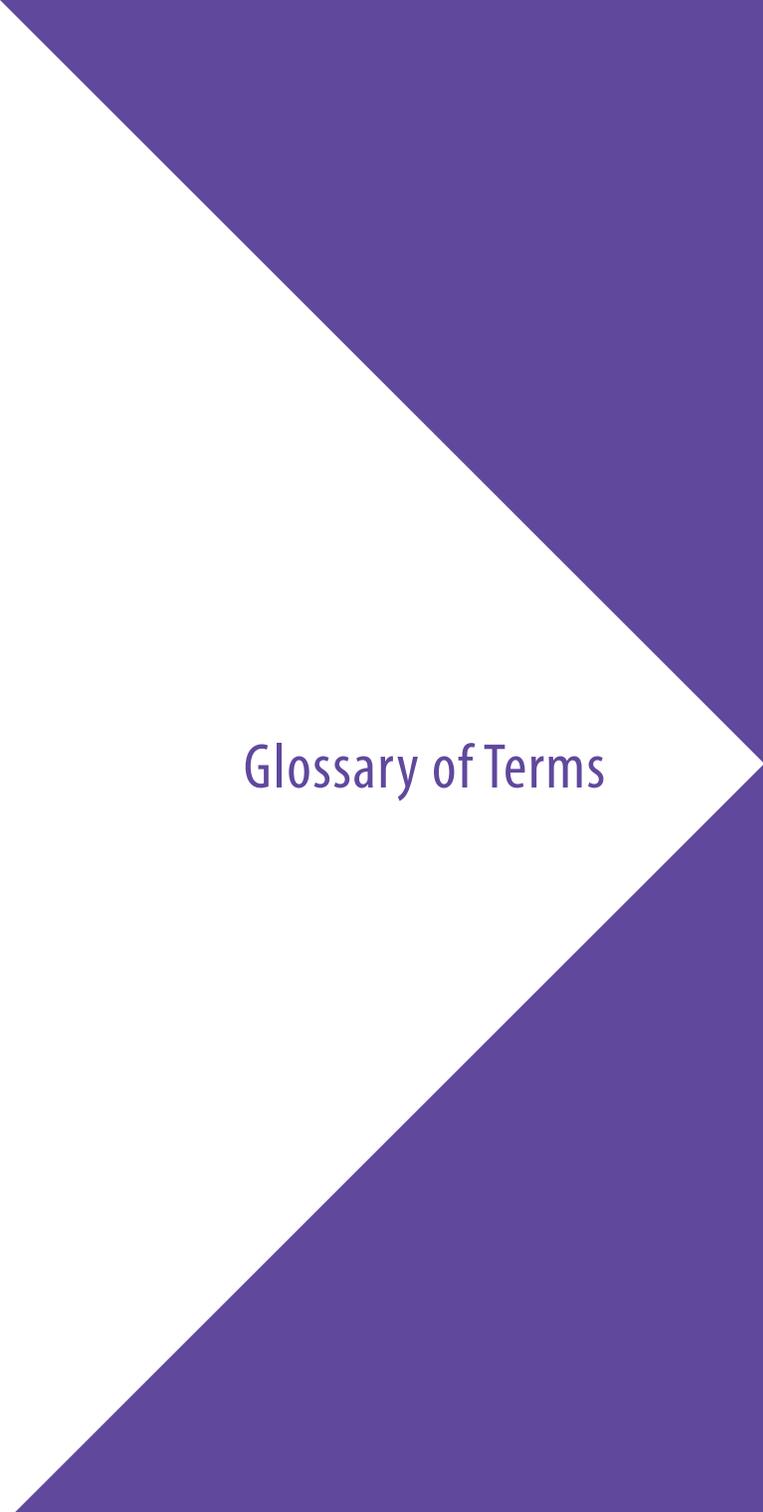
Our Commitments

We give personnel and other stakeholders — such as members and providers — many ways to report any concerns about organizational or individual integrity or compliance. We offer the option to report concerns anonymously. We review all reported concerns and conduct thorough and objective investigations. When we identify processes, behaviors or systems that don't comply with the law or our standards, we take prompt and effective corrective action.

Your Commitments

- If you think a business practice or relationship violates the law, the Code of Conduct or another organizational standard, tell the organization right away.
- To report a concern, use one of the many reporting channels the organization makes available to you:
 - Report it directly to your leader, or to your leader's leader.
 - Call or email integrity and compliance personnel directly.
 - Send an email to **integrityandcompliance@healthpartners.com** or to **privacy@healthpartners.com**.
 - Call the Integrity and Compliance Hotline at **1-866-444-3493**.
- You can report a concern anonymously by calling the Integrity and Compliance Hotline. Reports that you make anonymously must include enough information for integrity and compliance personnel to review the concerns you raise.
- When you report a concern, tell the truth and cooperate with the organization's review and investigation process.





Glossary of Terms

Abuse

Abuse is taking advantage of health care programs for personal benefit.

Antitrust laws

The intent of Antitrust laws is to promote business competition, which is good for consumers. These laws prohibit anti-competitive behavior and unfair business practices, like monopolies, bid-rigging and price-fixing, especially by businesses or groups of businesses that dominate the market.

Cash equivalents

Cash equivalents include gift cards, gift certificates, tokens, credits or other things that are used like cash, and can be used in place of cash.

Conflict of interest

A conflict of interest is a situation when your personal activities and relationships interfere with — or appear to interfere with — your ability to perform your work objectively and in the best interests of the organization and the people we serve. As a standard, we can't rely just on ourselves to determine whether a conflict of interest exists; it's determined when another reasonable and objective person would consider it a conflict.

Family

Family includes a spouse; birth or adoptive parent, child or sibling; step-parent, -child, or -sibling; parent-, child- or sibling-in-law; grandparent or grandchild; and spouse of a grandparent or grandchild.

Financial relationship

This includes an ownership or investment interest in a provider or other organization (or its owner) or a compensation arrangement between a clinician and another organization.

Fraud

Fraud is acting dishonestly and with an intent to receive a benefit for goods or services that you know you aren't entitled to.

Gifts

A gift is any item (including pens and pads), payments, meals, drinks, books, tickets, all forms of entertainment or any other materials of any value given voluntarily by a party without payment in return of equal value.

Good faith

When you do something in good faith, this means the actions were taken honestly and with good intentions.

Hotline

See the resource guide in this Code of Conduct for your Hotline phone number for reporting concerns. The Hotline can be used to report concerns anonymously.

Information security

Information security means maintaining the confidentiality, integrity and availability of electronic information.

Intellectual property

Intellectual property is materials or ideas created for the organization that get special protection by copyright, trademark, trade secret or patent laws. Intellectual property can take many forms, such as documents, processes, protocols, systems, computer codes, designs, inventions and web pages.



Privacy

There are many federal and state laws that require us to safeguard the confidentiality of members. Some of these laws also give individuals additional privacy rights, such as the right to access their records, the right to request an amendment to their records, and the right to receive a list of disclosures we've made of their information.

Protected information

Protected information of our members is information that identifies an individual and relates to their past, present or future physical or mental health or condition, health care services and payment for those services. It includes health information (such as diagnosis and treatment plans) as well as demographic information (such as your name, address, phone number, member ID, payment information, social security or other identification number and date of birth).

Record

A record can be in paper or electronic format, and memorializes official decisions or actions of the organization. Records contain relevant information relating to the delivery of health care, health care financing and administration, health research, operation of foundations and general business activities. Not all documents or electronic information are considered records, so it's important to consult the organization's record retention policy to make sure that you know how to treat the information you work with.

Reporting

When you have a concern, it's important to report it to your leader or to the Hotline, if appropriate. See the resource guide in this Code of Conduct for more information.

Retaliation

No one in our organization is permitted to retaliate — or take negative action — against a person for something they did or reported in good faith, with right and good intentions. Retaliation can include things like demotion, failure to promote, hostility, adverse changes in job conditions or requirements, or other undesirable actions by a leader or colleague.

Waste

Waste is acting in a way that results in the use of more resources than needed.



