



THIRD PARTY CODE OF CONDUCT



Why it matters

— A LETTER FROM OUR CORPORATE COMPLIANCE AND ETHICS OFFICER —

Compliance and ethics — why they matter

At Premera, we are firmly committed to complying with the highest standards of ethical behavior. We believe that every decision we make has a direct impact on our customers, the providers we partner with, the employees we work with, and the communities we serve. Therefore, we expect that all Third Party Organizations also conduct themselves with the highest standards of integrity and ethics.

Being a part of an ethical organization that embraces mutual understanding and respect makes me proud. The Third Party Organization Code of Conduct reflects these values, and we hold ourselves and our partners accountable to its standards. I encourage you to spend time reading and understanding it.

Doing the right thing and maintaining a culture of ethics and compliance can be challenging. It requires us to work together and hold ourselves accountable. If you see something that concerns you, I encourage you to speak up. Our shared commitment to the highest ethical standards is critical to making healthcare work better.

Thank you for your dedication to maintaining a culture of ethics and for your service to our customers and community.

Sincerely,
Sven Peterson
Corporate Compliance and Ethics Officer
Vice President of Compliance, Ethics and Regulatory Services



The values we stand by

Our values

PREMERA has embraced a Code of Conduct that requires us to operate under the highest ethical standards and comply with all applicable laws, rules, regulations, and regulatory guidance. We demonstrate our commitment to our members through our core values. PREMERA has six core values:

Do the Right Thing

Act with Urgency

Challenge Convention

Identify with the Customer

Be Excellent

Work Together

We have the same expectations of PREMERA's contracted Third Parties. This Code of Conduct applies to all contracted Third Parties and their employees, including Producers, Agencies, Field Marketing Organizations, Vendors, Delegated Providers, First Tier Entities (FTEs), Delegated Entities (DEs), Business Associates (BAs), Health Care Benefit Managers (HCBMs), and Non-employees (Contingent Workers and Outsourced Service Workers). This document establishes the requirements for doing business with us. Throughout this document, when the term "Third Party" is used, it applies to the Third Party entities we are contracted with, as well as their employees and subcontractors.

PREMERA recognizes its obligation to the communities in which it operates and participates in numerous efforts to contribute its resources and experience to the betterment of local charitable, educational, and other organizations. Accordingly, we expect you to act as good corporate citizens and encourage you to participate in community and other local support activities.

Working with us means making a commitment to uphold our company values and following the Code of Conduct outlined in this document. Please take the time to become familiar with the principles of the Third Party Code.

Thank you for upholding our values and helping us put our members at the center of all we do.

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Complying with the law

Complying with the law

PREMERA is committed to complying with all applicable laws, regulations, and standards. As a trusted PREMERA partner, we expect the same from you. You must know and understand the laws that affect your business and ours, provision of services, products, and areas of responsibility. This includes, but is not limited to, the laws and regulations specifically identified in this Vendor Code. Please refer to premera.com/visitor/partners-vendors for additional information.

Failure to comply with a law could result in fines and penalties for PREMERA for which the Third Party would be responsible. You must take appropriate steps to effectively communicate regulatory requirements to your workforce. In certain circumstances, you may be required to complete compliance training as required by your contract or applicable law.

Regulatory oversight

PREMERA recognizes the significance of its partnerships with the federal, state, and local governments. Doing business with the government necessitates strict adherence to special laws and regulations. Compliance with these laws and regulations is critical, as the consequences for violating these legal requirements can be severe and should not be taken lightly. To ensure compliance with the various laws and regulations, PREMERA requires you to complete an annual Third Party Attestation if you are considered an FTE, DE, or BA. Completion of this attestation is mandatory to continue doing business with PREMERA.

Medicare Advantage requirements and responsibilities

In accordance with the Centers for Medicare & Medicaid Services' (CMS) rules and regulations, if you support PREMERA's Medicare Advantage line of business, you are responsible for completing Medicare Advantage activities including but not limited to compliance, fraud, waste, and abuse (FWA), and job-specific compliance training and education. You are also responsible for ensuring all your employees and subcontractors are properly screened against appropriate government sanction lists prior to contracting/employment, and monthly thereafter.

Requests for information from government agencies

We embrace a cooperative approach to handling reasonable requests for information about PREMERA from federal, state, and local authorities within the safeguards provided by the law. For example, PREMERA may be asked for Personal Protected Information (PPI) that is protected by federal and state privacy laws and regulations. These include new Health Insurance Portability and Accountability Act (HIPAA) regulations restricting the use and disclosure of reproductive healthcare Protected Health Information (PHI) for investigations, imposing liability, and

identifying individuals in connection with these two activities. In certain circumstances an attestation from the party requesting the information will be required. Premera is obligated to ensure that the agency is allowed to receive PPI and, if possible, we may request special protection for it.

Complying with the law

If you receive a request for information from any government agencies, please work with your PREMERA contact before responding to the request. You will be expected to comply in a timely manner and may make any reasonable request for further instruction or approval. Please use the relevant sections of the most recent [Centers for Medicare and Medicaid Services \(CMS\) audit protocols](#) to ensure your company and any First Tier, Downstream, or Related Entities (FDR) will be able to quickly provide CMS with requested documentation in the formats specified. Also ensure that your company is meeting the standards that CMS will be auditing.

Offshore operations and CMS reporting

According to CMS, an offshore subcontractor refers to an FDR located outside of one of the 50 U.S. states, the District of Columbia, or one of the United States territories (American Samoa, Guam, Northern Marianas, Puerto Rico, and U.S. Virgin Islands). Offshore subcontractors can be either American-owned companies with certain operations performed outside the United States or foreign-owned companies with operations performed outside of the United States. This includes, but is not limited to, receiving, processing, transferring, handling, storing, and accessing beneficiary PHI performed by a vendor or its subcontractors on behalf of PREMERA that take place outside of the United States.

To ensure compliance with applicable federal and state laws, rules, and regulations, you must notify PREMERA prior to engaging any offshore individual or entity. This includes, but is not limited to, employees, contractors, data centers, downstream subcontractors, agents, representatives, or other parties located outside of the United States. If you utilize offshore entities to handle PHI, you are considered an offshore entity and must inform PREMERA of this status. Any changes to offshore status must be approved by PREMERA via contract before any services can continue. Additionally, Plan Sponsors are required to notify and provide an attestation to CMS within 30 calendar days of signing an offshore contract or modifying an existing contract to add offshore functions. NOTE: The disclosure timeline is based on when the contract is signed, not the effective date of the contract.

PREMERA must perform, or use a third party to perform, an annual audit of offshore subcontractors to ensure the protection of PHI. This audit must be conducted every year, and the results need to be reviewed annually to determine if the offshore relationship will continue. Additionally, the audit results must be retained for the full record retention period and shared with CMS, upon request.

If you have been approved to provide partial or full services offshore to PREMERA, you must provide attestations annually. Furthermore, you must maintain documentation of offshore status for a minimum of 10 years if you support Medicare Advantage or Individual lines of business.

Preparation and submission of accurate reports

Federal and state healthcare programs have strict reporting requirements. All proposals, budgets, financial data, and other reports created as part of these programs must be accurate, complete, and subject to appropriate management review. Adequate records to support these documents must be retained in accordance with our record retention requirements. There are severe sanctions if false data is submitted to the government.

These requirements also apply to time reporting and expense reports. Any costs charged to the government must be accurate and appropriately supported. In addition, there are specific rules covering what costs may be charged and how they can be allocated.

Complying with the law

Licensing, registrations, and insurance

We require our vendors to comply with all legal and regulatory requirements applicable to their business, such as entity licensing or registrations. You may be required to provide proof of compliance. We may also audit compliance with these requirements. It is your duty to ensure required licenses and registrations are maintained in good standing with issuing authorities. It is your responsibility to proactively advise us if there is a change in your licensing or registration status that could negatively impact you, PREMERA, or our customers. Proof of required coverage may be required at the contracting stage and at various times during the relationship. As with licensing and registration requirements, vendors must maintain the required coverage while providing services to PREMERA. Vendors are also responsible for notifying us immediately if there is any cancellation or reduction in coverage.

Bribery, corruption, and improper payments

You are not allowed to directly or indirectly solicit, accept, offer, promise, authorize, or give bribes or other improper payments to or from anyone. This includes facilitation payments. A facilitation payment is a monetary payment that may be considered a bribe. It is made with the intention to expedite an administrative process. The payment is made to a public official or a government official as encouragement to complete an action or process something quickly to the benefit of the party making the payment. No payment or benefits, other than those approved by PREMERA in writing, may be made to customers or prospective customers as an incentive to buy our products. Using PREMERA funds or assets for any unlawful or unethical purpose is prohibited. Remember, **Do the Right Thing**.

Competition and antitrust

PREMERA is committed to complying with federal antitrust and state fair competition laws. To ensure compliance, you are forbidden from:

- Discussing PREMERA's pricing, bids, discounts, promotions, costs, and the like with any of PREMERA's competitors
- Making agreements with PREMERA's competitors to allocate customers or divide markets
- Making false or deceptive statements about PREMERA's products or services

Complying with the law

Labor and human rights

PREMERA considers Equal Employment and Affirmative Action when making employment decisions. We are committed to respecting the human rights of all individuals and recognize the importance of promoting individual health and welfare and economic development.

PREMERA follows all laws and regulations governing its employment practices and the treatment of employees. We expect our vendors to fully comply with employment laws and have similar human rights and employment policies and practices for their workers. This includes laws prohibiting slavery, child labor, bonded labor, involuntary servitude, and human trafficking, as well as regulations related to local laws regarding minimum wage, wage payment, overtime, minimum working age, working hour restrictions, labor organizing, collective bargaining, workplace conditions, and any other applicable labor standards. We will not knowingly do business with any vendor that benefits in any way from the trafficking or abusive treatment of workers.

Anti-discrimination

PREMERA is committed to maintaining a culture of integrity, ethical conduct, and compliance with all state and federal laws and regulations. We firmly oppose any form of discrimination and will not discriminate based on race, color, ethnicity, national origin, sex, gender, identity and expression, marital status, age, sexual orientation, disability, language fluency, religion, genetic information, veteran status, or other protected categories under federal, state, or local law. We hold our vendors accountable for maintaining the same level of compliance.

Culture and belonging

At Premera, we promote a respectful and fair workplace environment, where employees have the opportunity to reach their full potential and are able to support the pursuit of accessible and responsive healthcare for our members. We expect our vendors to operate similarly.

Complying with the law

Workplace conduct

Safety, health, and environment

PREMERA is committed to providing a safe and healthy workplace for visitors to our campuses. We are equally committed to minimizing the environmental impact of our operations. These commitments can only be met through awareness and cooperation. Each of us is responsible for contributing to a safe and healthy work environment.

We expect our third parties to comply fully with all employment laws and to have similar employment practices as outlined below:

Health and safety

PREMERA complies with all applicable health and safety laws and regulations to ensure that work is performed in a safe and responsible manner. We are committed to maintaining a safe, secure work environment and will not tolerate any acts or threats of workplace violence. Any Third Party or individual(s) providing on-site services at a PREMERA facility must adhere to the same occupational health and safety standards.

You are expected to provide a safe and healthy work environment for all employees working at your locations. This includes prioritizing health and safety and complying with all applicable safety and health laws, regulations, and practices in the jurisdictions where you do business on behalf of PREMERA.

Drugs and alcohol

PREMERA maintains a drug-free workplace, which extends to any illegal or controlled substances, including marijuana. The manufacture, possession, distribution, dispensation, or use of any drug or substance that could alter behavior or impair the ability to perform work is strictly prohibited on any PREMERA campus or while conducting business-related activities off company premises.

If you are representing PREMERA at a meeting or social event, you must not use alcohol to the point of impairment. You are expected to always use good judgment at events where alcohol is served and are responsible for your own conduct during the event and thereafter. You may be held liable under state and local law if you become intoxicated and damage property or injure others.

Protecting our data

Protecting our data

Accuracy of records

PREMERA expects all documentation to be authorized by management and properly recorded. For example, making records appear as though payments were made to one person when, in fact, they were made to another, or submitting invoices that do not accurately reflect the true nature of an expense, is not allowed. As a trusted PREMERA partner, we expect the same from you.

Providing false information, whether verbally or in writing, is also prohibited. This includes intentionally misrepresenting facts during investigations, audits, process reviews, and/or any other fact-finding efforts taken on behalf of PREMERA or any regulators examining PREMERA. As with everything else we do, record keeping must be driven by honesty, authenticity, and integrity. Do the Right Thing. For more information, please refer to premera.com/visitor/partners-vendors.

Electronic communications

If PREMERA provides access to its communication systems, such as email, chat, and video conferencing software for your use, these should be used primarily for business purposes. Personal use is permitted on a limited basis. Please remember that all usage must comply with PREMERA policies. To ensure our policies are being followed, we reserve the right to monitor and disclose the contents of electronic media and communications, where permitted by law.

You must not use PREMERA resources to send offensive communications, including jokes or graphics, which would violate our policies regarding unlawful retaliation, harassment, and discrimination. Conduct all communications in a professional and respectful manner.

Communications containing member PHI should only be sent in an encrypted fashion and should only include the minimum amount of PHI necessary.

Using company assets

Delivering excellent service includes working efficiently and using PREMERA assets in the way they are intended to be used. These assets include, but are not limited to, the following:

- Equipment
- Company property and buildings
- Corporate funds
- Office supplies
- Business strategies and plans
- Financial data, records, and work files
- The third party's work time
- Other confidential information about our business and our customers

Protecting our data

You must not use PREMERA assets for personal gain or for the benefit of others. Because such assets belong to PREMERA, they should not be transferred to others outside the course of normal business. If you have access to PREMERA's technology resources, you should have no expectation of privacy when using PREMERA equipment. Activity using any of PREMERA Technology Resources may be monitored at any time without notice.

Brand assets

You are not authorized to use the name(s) and/or logo(s) of PREMERA and its subsidiaries and affiliates for publicity and marketing without express written permission from PREMERA. For the approval process, please consult your PREMERA contact.

PREMERA's confidential information

Confidential information includes any information about PREMERA, PREMERA business, our employees, PREMERA customer information, or any Third Party doing business with PREMERA that is not generally available to the public. Maintaining confidentiality is critical to our business operations and any improper use or disclosure of this information could harm PREMERA. As a trusted PREMERA partner, we expect you to uphold the same level of confidentiality. It is critical that you are aware of and understand the laws that affect your business and ours, as well as the industry, provision of Services, Products, and areas of responsibility. Do the Right Thing. For more information, please refer to premera.com/visitor/partners-vendors.

Examples of Premera's confidential information include, but are not limited to:

- Protected personal information (PPI), which includes protected health information (PHI). This can also include PPI/PHI in deidentified form.
- PREMERA's confidential employment information
- Financial data
- Internal systems data
- Pricing or product information
- Sales and marketing figures
- Underwriting information
- Lists of customer groups or individuals
- Changes in management or policies
- Provider reimbursement or contracting information
- Information about PREMERA's relationships with governmental authorities or public and private organizations
- Plans for improving any of our products or services
- Confidential customer information
- Third Party contracts, terms, and pricing

Protecting our data

Trade secrets

You are prohibited from misappropriating PREMERA's trade secrets under the Washington Uniform Trade Secrets Act (WUTSA), located at Chapter 108 of Title 19 of the Revised Code of Washington. The WUTSA provides broad protection to PREMERA trade secrets, which include a third party's work on confidential projects and business strategies for PREMERA. The WUTSA prohibits Third Parties from disclosing not only written or electronic documents, but also information recalled from memory. Your obligation to protect PREMERA's trade secrets continues even after the end of your engagement with PREMERA.

Protecting PPI and confidential information

Ensuring the protection of PPI and confidential information is of the utmost importance and requires constant care and vigilance. For example, you should always be careful to avoid discussing matters related to work being done at PREMERA while working remotely, in public places, or even in the common areas of a PREMERA work location. Discussions involving member PPI and/or confidential information should only be conducted around individuals authorized to have access to such information and who require it to carry out their duties for PREMERA. Protecting our data, including PPI, also includes using strong passwords, securing your devices from theft and infiltration, and locking physical documents containing PPI away when not in use.

Reporting a breach of information

If you discover any potential unauthorized use or disclosure of PPI by yourself, another employee or vendor, or your company, it is crucial to report it immediately. Contact your PREMERA business contact to report a breach of information using the form and manner set forth in the Business Associate Agreement. If you wish to remain anonymous, contact the Compliance & Ethics Hotline (provided by Compliance Line) at **888-418-1537** and provide all relevant details.

Responsible use of AI

Artificial Intelligence (AI) is rapidly emerging as a transformative technology that promises unprecedented opportunities and efficiencies across all industries, including healthcare. Premera has established a Responsible AI Program that is committed to the development, deployment, and governance of AI applications in a responsible, ethical, legally compliant, transparent, secure, and socially beneficial way while unlocking AI's transformative potential. When planning AI innovations in your products or services that are used by Premera, you must provide advanced written notice describing the upcoming change, with ample time for risk review and confirmation by Premera prior to use. AI implementations should always support opt-in/opt-out capabilities as Premera's requirements may support or restrict the use of AI in certain use cases.

Protecting our data

Retaining records

You must maintain accurate and complete records regarding all matters related to your business with PREMERA. Laws and regulations govern the length of time records must be retained. If PREMERA is involved in litigation or a government investigation or audit, related records must not be destroyed until the matter is closed. We take this matter extremely seriously. Therefore, destruction or alteration of documents related to a legal or regulatory matter is prohibited. Before destroying any records, consult with your PREMERA business contact.

Confidential information of others

Confidentiality is fundamental to our work. PREMERA keeps confidential information about our customers, suppliers, and others secure, and we take the necessary precautions to prevent accidental disclosure of this information. As a trusted PREMERA partner, we expect the same level of commitment from you. You must know and understand the laws that affect your business and ours.

This information must also be protected from improper use and disclosure and be handled appropriately according to applicable law and established PREMERA policies and procedures.

For example, laws prohibit your unauthorized disclosure or use of another company's trade secrets. You should also honor any contractual commitments you may be subject to that prohibit disclosure or use of any confidential or proprietary information.

Third parties must continue to protect private, proprietary, and confidential information even after they are no longer associated with PREMERA. For more information, please refer to premera.com/visitor/partners-vendors.

Customer privacy

PREMERA is committed to complying with federal and state privacy laws, including the HIPAA privacy regulations that protect the financial and health information of our customers. As a trusted PREMERA partner, we expect the same from you. You must know and understand the laws that affect your business and ours.

PREMERA uses the following privacy principles to guide our actions::

Customers – Customers should enjoy the full array of privacy protections afforded to them by law and routinely granted by their providers. This is a values-based approach, focused on these two core values: **Identify with the Customer** and **Do the Right Thing**.

Employers – PREMERA believes in providing the appropriate level of information to employer groups and their producers while minimizing the employer's obligations under the law.

PREMERA creates, collects, receives, maintains, transmits, uses, and discloses PPI, such as name, date of birth, address, and claim information, to pay claims and otherwise serve our customers. We work diligently to comply with federal and state privacy laws that govern the ways we handle our customers' PPI. Before handling this type of information, please discuss it with your PREMERA business contact.

Where appropriate, we use technical and/or physical security safeguards, such as encrypted email, badges to enter our buildings, and security guards, to ensure our privacy policies are followed.

Protecting our data

Social media, cloud storage, artificial intelligence (AI), and file transfer websites

You are not allowed to use PREMERA assets to access and use social media sites, cloud storage sites, file transfer websites, website tracking technology or AI systems or machine learning technology (such as ChatGPT or Bard) that are not approved by PREMERA. Widespread use of such sites in the workplace can lead to an increased risk of unauthorized disclosure of PPI, as well as an increased risk of malicious software infection. Under no circumstances are vendors or their employees allowed to post on social media or have any press about their relationship with PREMERA without written approval first. Contact your PREMERA business contact for additional information.

Many of our corporate and departmental policies apply to online activities, such as the prohibition of sharing PPI. Specifically, you must not disclose PPI or any other PREMERA confidential or proprietary information online. PPI may never be sent via email without first being encrypted and secure. PPI may never be sent via an Internet file-transfer cloud service website without specific approval from PREMERA Cybersecurity. Uses or disclosures of PPI that are allowed by corporate and departmental policy, but that are too large to be transferred by confidential email or other secure electronic channels, should be done through the Electronic Transmission Center (ETC). Contact your PREMERA business contact for information on how to use the ETC.



Conflicts of interest

Conflicts of interest

Duty of professional loyalty and conflicts of interest

We value loyalty and are committed to preventing outside activities, personal interests, and relationships from impacting the decisions we make when performing our duties. All Third Parties engaged to perform services on our behalf are expected to be loyal and avoid conflicts of interest. This means business decisions must be based on the best interests of PREMERA and should not be motivated by personal desires or relationships. For more information, please refer to premera.com/visitor/partners-vendors.

Conflicts of interest can happen if your activities or interests influence or appear to influence your performance for PREMERA. Many situations can cause a conflict of interest. Conflicts can be difficult to detect and are often judgment calls between what is acceptable and unacceptable. The existence of a potential conflict may not mean the outside activity or relationship must end. In many cases, steps can be taken to prevent the conflict from impacting our work.

You must avoid actual conflicts as well as the appearance of a conflict. We rely on you to disclose any relationships that could be misinterpreted as a conflict. This includes, but is not limited to, relationships with:

- Customers
- Employees
- Vendors
- Regulators
- Business partners (such as producers and brokers)
- Providers
- Non-employees
- PREMERA competitors
- Marketplace

If you have questions about an activity, situation, or relationship that might cause a conflict of interest, discuss it with your PREMERA business contact. If a potential conflict exists, it must be reported to Regulatory Compliance & Ethics. We will work together to develop a plan to address the conflict.

EMAIL:
compliance@premera.com

**ANONYMOUS
COMPLIANCE &
ETHICS HOTLINE:**
888-418-1537

REPORT:
mycompliancereport.com
(Access ID: PBC)

Conflicts of interest

Kickbacks and rebates

The Anti-Kickback statute is a healthcare fraud and abuse statute that prohibits knowingly and willfully offering or receiving a payment, reward, or anything of value to or from a Third Party, provider, member, or beneficiary in return for payment/reimbursement under a government program.

You may not receive kickbacks or personal rebates for purchasing or selling goods and services for PREMERA. Kickbacks and rebates come in various forms and are not limited to direct cash payments or credits. Generally, if you stand to gain personally through the transaction, it is prohibited. Such practices are unethical and may be illegal. Contact your PREMERA business contact or Regulatory Compliance & Ethics with questions about a transaction.

Payments to business partners

All agreements with third parties must be in writing and approved by Legal or Enterprise Vendor Management and Contracting. The agreement must clearly and accurately define the services to be performed and the commission or fee involved. Any payments must be reasonable in amount and priced fairly for the value of the services rendered.

Gifts, gratuities, and entertainment

Entertainment and other things of value are often used to build business relationships. However, gifts and entertainment that appear to compromise your ability to make fair business decisions create ethical issues. PREMERA has restrictions that may apply to gifts or anything of value received from a Third Party. However, if the entertainment is primarily intended to gain favor, it is not allowed. Before offering entertainment, you should contact PREMERA's Regulatory Compliance & Ethics department or your PREMERA business contact with any questions about the appropriateness of the entertainment. When accepting or providing offers of entertainment on behalf of PREMERA, your employees are expected to model appropriate behavior and Do the Right Thing.

PREMERA is committed to doing the right thing. Even the mere appearance of impropriety in giving or receiving gifts, entertainment, or things of value can jeopardize the company's interests, and is inconsistent with PREMERA's commitment to acting with the highest level of integrity. Gifts should not be solicited from Third Parties or customers or PREMERA employees and may not be accepted under any circumstances from these parties as it relates to the work you are doing on behalf of PREMERA. When giving gifts to PREMERA employees, the same guidelines exist; gifts must be given in an honest and transparent manner and not designed to influence the PREMERA employee. Additionally, they must be non-cash items and under \$75 in value. Additionally, any event where PREMERA employees, non-employees, and/or customers are present, whether organized or casually arranged, must demonstrate inclusivity to all employees regardless of age, sex, gender identity or expression, sexual orientation, marital status, genetic information or disability, race, religion, color, national origin, veteran status, or any other protected category.

For more information about gifts, see the Giving and Receiving Gifts, Meals, Entertainment and Other Items of Value policy at premera.com/visitor/partners-vendors.

Conflicts of interest

Gifts or business courtesies to government employees

Government employees may not accept anything of value from a business or current or potential third party working on behalf of a business such as PREMERA. Therefore, you are forbidden from offering any money, gifts, services, entertainment, or anything else of value to any government employee. Contact your PREMERA business contact with any questions about these requirements.

Vendor travel and living expense reimbursement

Premera does not typically reimburse vendors for travel and living expenses. Please refer to your contract (if applicable) for additional information.

Reporting suspected noncompliance

Reporting suspected noncompliance

If you suspect or detect non-compliance, breach, fraud, waste, or abuse (FWA), or Vendor Code violations, your first action should be to report it immediately. Don't ignore the issue, wait to confirm your suspicions, or consult another person.

The Regulatory Compliance & Ethics department reviews and investigates all reported potential violations as appropriate and in a timely manner. During an investigation, the Regulatory Compliance & Ethics department partners with other departments as appropriate to ensure that all relevant information is reviewed and considered. The Special Investigations Unit (SIU) is responsible for researching suspected FWA.

The Corporate Compliance & Ethics Officer is responsible for directing the investigation of all suspected violations of, and reporting the results to, the Audit and Compliance Committee of the Board of Directors. Additionally, we are committed to reporting violations of the Code, including violations of law, regulations, and applicable government contracts to the appropriate regulatory agency.

Reporting violations and seeking guidance

We all must work together to help protect PREMERA from actions that could harm our operations, reputation, or future growth. You are therefore expected to report actual or suspected violations involving:

- Third Party Code of Conduct
- Corporate and departmental policies
- Laws or regulations

You may talk to your PREMERA business contact, or Regulatory Compliance & Ethics. We value the right of individuals to remain anonymous. Anyone who wants to remain anonymous is encouraged to contact the Compliance & Ethics Hotline, our third party-managed hotline at 1-888-418-1537 or [MyComplianceReport.com](https://mycompliancereport.com) (Access ID: PBC), 24 hours a day, 7 days a week. Remember, we have a policy that prohibits retaliation and intimidation for reports made in good faith.

If you choose to report anonymously, include as many details as possible. We may not be able to complete our investigation if we do not have adequate information. Also, check back frequently to ensure we don't require additional information.

EMAIL:
compliance@premera.com

**ANONYMOUS
COMPLIANCE &
ETHICS HOTLINE:**
888-418-1537

REPORT:
mycompliancereport.com
(Access ID: PBC)

Conducting investigations

When an incident is reported, it may be investigated by Regulatory Compliance & Ethics, Human Resources, Internal Audit, Legal, Privacy, or the Special Investigations Unit.

Anonymous reports will remain anonymous. If your identity is known, we will maintain confidentiality to the extent permitted by law.

If the suspected noncompliance is at your location, it is expected that you will conduct a thorough investigation and will immediately inform your PREMERA business contact of the issue. The results of the investigation along with any corrective action should also be shared with PREMERA.

Definitions

Business associate (BA)

A person or entity that creates, receives, maintains, or transmits protected personal information (PPI) in the performance of a function or activity for the Company, including but not limited to pharmacy benefit managers, disease management vendors, consultants, temporary workers, vendor workers, third party administrators, auditors, and lawyers. It does not include all consultants, temporary workers, vendor workers, or vendors providing services to the company.

Delegated entity (DE)

Any party, including an agent, vendor, or broker that enters into an agreement with a Qualified Health Plan issuer to provide administrative services or health care services to qualified individuals, qualified employers, or qualified employees and their dependents.

Downstream entity

Any party, including an agent or broker, who enters into an agreement with a Delegated Entity or with another Downstream Entity for purposes of providing administrative or health care services related to the agreement between the Delegated Entity and the Qualified Health Plan issuer. This is the entity that directly provides administrative services or health care services to qualified individuals, qualified employers, or qualified employees and their dependents.

First tier, downstream, or related entity (FDR)

Any party entering into a written agreement acceptable to the Center for Medicare and Medicaid Services (CMS) with a Medicare Advantage Organization (MAO) or Part D plan sponsor (Sponsor) to provide administrative or healthcare-related services. These arrangements continue down to the ultimate provider of health and administrative services including those contracted with first tier entities and those related to an MAO or sponsor by common ownership or control and performs some of the MAO or sponsor's management functions, furnishes services to enrollees, leases property or sells materials to the MAO or Sponsor.

First tier entity (FTE)

Any party that enters into a written arrangement, acceptable to the Center for Medicare and Medicaid Services (CMS), with a Medicare Advantage Organization (MAO) or Part D plan sponsor (Sponsor) or applicant to provide administrative services or health care services to a Medicare-eligible individual under the Medicare Advantage program or Part D program.

Fraud

Knowingly and willfully executing, or attempting to execute, a scheme or artifice to defraud any health care benefit program; or to obtain, by means of false or fraudulent pretenses, representations, or promises, any of the money or property owned by, or under the custody or control of, any health care benefit program.

Health care benefit managers (HCMB)

Any person or entity that provides services to or acts on behalf of a health carrier or employee benefits program. HCBMs directly or indirectly impact the determination or use of benefits for or patient access to health care services, drugs, and supplies.

Indirect health care benefit managers (indirect HCBM)

Any person or entity that enters into a written arrangement below the level of the arrangement between a health carrier or employee benefits program and an HCBM to perform HCBM services for their members. These written arrangements continue down to the level of the ultimate provider of the HCBM services. Indirect HCBMs are not contracted directly with a health carrier or employee benefit program.

Definitions

Protected health information (PHI)

Protected health information is the term given to health data created, received, stored, or transmitted by Health Insurance Portability and Accountability Act (HIPAA) covered entities and their business associates in relation to the provision of healthcare, healthcare operations and payment for healthcare services.

Protected health information is often shortened to PHI, or in the case of electronic health information, ePHI.

Protected personal information (PPI)

Any information created or received by the company that identifies, or can readily be associated with, the identity of an individual, whether oral or recorded in any form or medium, that relates to 1) the physical, mental or behavioral health or condition of an individual; 2) genetic information of the individual or their dependent, or relative of either; 3) payment for the provision of health care to an individual; 4) provision of health care to an individual; or 5) finances of an individual.

Related entity

Any party that is related to a Medicare Advantage Organization (MAO) or Part D sponsor (Sponsor) by common ownership or control and performs some of the MAO or Part D plan sponsor's management functions under contract or delegation, furnishes services to Medicare enrollees under an oral or written agreement, or leases real property or sells materials to the MAO or Part D plan sponsor at a cost of more than \$2,500 during a contract period.

Sensitive PPI (SPPI)

A subset of protected personal information that includes services, supplies and drugs related to STDs, HIV/AIDS, chemical dependency, reproductive health, gender dysphoria, gender affirming care, domestic violence, behavioral health, and genetic information.

Third party

A vendor, Business Associate, First Tier Entity, Delegated Entity, producer, or provider currently doing business with the Company or seeking to do business with the Company.

Waste and abuse

Requesting payment for items and services when there is no legal entitlement to payment. Unlike fraud, the provider might not have knowingly and/or intentionally misrepresented facts to obtain payment.

Conclusion

Regulatory Compliance & Ethics contacts

If you are aware of any possible noncompliance issues, please contact PREMERA immediately. You may use the following avenues to report any violations.

NAME	EMAIL	PHONE
Regulatory Compliance & Ethics Department Mailbox	compliance@premera.com	N/A
Compliance & Ethics Hotline (may report concerns anonymously, if desired)	mycompliancereport.com (Access ID: PBC)	888-418-1537

PREMERA

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