Code of Conduct

PREMERA BLUE CROSS

PREMERA HMO
Welcome

WHY IT MATTERS

Dear Employee:

As we strive to make healthcare work better for our customers, our efforts are guided by the values of Premera:

• Identify with the Customer
• Act with Urgency
• Be Excellent
• Challenge Convention
• Do the Right Thing
• Work Together

While all six of the values are important, the most important of our values is **Do the Right Thing**. As employees of Premera*, we have a responsibility to ourselves, our company, and our customers to always act with the highest standards of integrity and ethics, and be compliant with applicable laws and regulations, as well as our own standards of conduct. This responsibility is paramount, and as CEO of Premera, my commitment to this value is unwavering.

Through our Code of Conduct, as approved by our Board of Directors, we declare our commitment to **Do the Right Thing**. Please review Premera's Code of Conduct to understand our expectations for you and your obligations as a Premera employee. **Do the Right Thing**—it's a value we all share and must live.

— Jeff

Jeff has nicely captured our fundamental commitment to **Do the Right Thing**. Ensuring that the decisions we make every day are ethical and customer-focused is everyone's job, regardless of your job title.

Our Code of Conduct is a statement of our values and the commitments that we make to our customers and to each other. As humans, we all make mistakes, but when that happens the important thing is to acknowledge the error and fix it so that our customers receive the service they deserve. For that reason, employees are expected to report any actual or perceived misconduct so that we can investigate it and take appropriate action. To support this expectation, Premera has a strong non-retaliation and non-intimidation policy. Ethics is a team sport – while none of us is perfect, together we can ensure that Premera delivers on our commitments to our customers. We are honored to partner with you to **Do the Right Thing** every day.

— Sven

*Spremera refers to PREMERA and its affiliated companies, excluding Practice Management Group, LLC (PMG).
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Purpose and values
Purpose and values

Our purpose:
Improve customers’ lives by making healthcare work better

Our values:
The customer is the center of all we do
Identify with the Customer
Act with Urgency
Be Excellent

Challenge Convention
Do the Right Thing
Work Together

Diversity, equity, and inclusion
Premera’s commitment to diversity, equity, and inclusion (DEI) starts with our corporate strategy, values, and code of conduct. We know that making healthcare work better requires deep structural and institutional changes to achieve health equity and access in the communities we serve, while creating a safe and respected environment for our employees regardless of race, color, ethnicity, national origin, sex, gender identity and expression, marital status, age, sexual orientation, disability, language fluency, religion, genetic information and veteran status.

To ensure our continued success, we need to focus on how we achieve our business objectives, not just on meeting our short-term goals. Therefore, Premera has established core values to guide how we work, which is important for building trust in our relationships with customers, providers, third parties, and regulators. All Premera employees, and all people who are authorized to act on the company’s behalf, are expected to exhibit these shared values as they perform their work.

Do the Right Thing. Simple words that are the foundation upon which Premera’s Compliance & Ethics Program is built. This Code of Conduct (the “Code”) models our commitment to doing the right thing, in addition to always acting legally and ethically in how we conduct business. The Code is our formal declaration to our Board of Directors, external committee members, and employees (collectively “you”) that Premera expects you to do the Right Thing.
Your responsibilities
Your responsibilities

You are expected to follow this Code, all corporate and departmental policies, and applicable laws and regulations (“laws”). In addition, you must report any suspected violations to your manager, Regulatory Compliance & Ethics, or Employee Experience. If you are uncomfortable reporting an issue, you may report anonymously using the Compliance & Ethics Hotline, our third party-managed reporting system. Premera does not tolerate retaliation or intimidation for making a good faith report or for participating in an investigation.

- Consider ethical concerns when making all business decisions. Never commit, or ask others to commit, unethical or illegal acts.
- Make sure you are up to date with laws, regulations, and policies. We all have a duty, under law, to comply with applicable laws.
- When in doubt, ask! You should promptly discuss ethical or compliance concerns or questions with your manager, Regulatory Compliance & Ethics, or your HR business partner.

Leader responsibilities

Our leaders play an important role in supporting our culture of ethics and compliance. Leaders are responsible for holding their teams accountable to adhering to the Code of Conduct. Leaders must always be role models of appropriate behavior and set a good example.

Leaders are expected to:

- Embrace our Code and make sure employees understand the behaviors expected of them.
- Create a positive environment where employees feel comfortable raising concerns or challenging questionable conduct.
- Be transparent. Never disregard ethical standards in order to achieve any business objective or personal goal.
- Recognize and reward employees whose behavior demonstrates our values.
- Immediately report known or suspected non-compliance, fraud, waste, and abuse (FWA), or Code violations.
- Adhere to and periodically remind employees about our non-retaliation policy.
- Ensure that all mandatory trainings, required disclosures, and certifications are completed in a timely manner by their team.
- Monitor the business partners and the contractors/contingent workers they engage/manage to ensure their conduct is consistent with our Code.

Q: I had a claim that was technically paid correctly, but it doesn’t feel right. What can I do about it?

A: Talk to your manager. If you are not comfortable doing that, talk to the next level of management, contact Regulatory Compliance & Ethics, Employee Experience, or use the anonymous Compliance & Ethics Hotline. Open discussions of ethics strengthen our culture at Premera.
Your responsibilities

Premera's responsibility to respond

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

The Regulatory Compliance & Ethics department reviews and investigates all reported potential violations of the Code as appropriate and in a timely manner. During an investigation, the Regulatory Compliance & Ethics department partners with HR to ensure that all relevant information is reviewed and considered. Other departments may also be involved as necessary.

The Corporate Compliance & Ethics Officer is responsible for directing the investigation of all suspected violations of the Code and reporting the results to the Audit and Compliance Committee of the Board of Directors, or the full Board of Directors. Additionally, we are committed to reporting violations of the Code—including violations of law, regulation, and applicable government contracts—to the appropriate regulatory agency or business partner as needed.
Compliance with the law
Compliance with the law

All Premera employees must know and understand the laws that affect your business unit and area of responsibility. Failure to comply with a law could result in fines and penalties for Premera. Employees who do not comply with applicable laws and regulations could be subject to corrective action, up to and including termination of employment and criminal charges or prosecution.

Reporting of fraud committed against Premera

You are a vital part of the effort to prevent, detect, and report non-compliance, as well as possible fraud, waste, and abuse (FWA). If you suspect fraud has been committed, you must report it. The Special Investigations Unit (SIU) or Internal Audit Department will research the matter. As appropriate, funds will be recovered and the proper authorities will be contacted.

See Appendix A for links to applicable laws that apply to fraud, waste and abuse. We all have a duty, under law, to comply with the requirements of these laws. And review Appendix B for the Definitions and Key Indicators of potential FWA for customers, providers, pharmacies, wholesalers, manufacturers, plan sponsors, and employees.

Q: How can I learn what laws and regulations apply to my area?
A: Be familiar with the corporate and departmental policies that are applicable to your job function. All corporate policies are developed and managed in conjunction with the Regulatory Compliance & Ethics department and can be found on the Corporate Policies internal website. Departmental policies and procedures are the responsibility of individual departments to create, maintain, distribute and when necessary, communicate important changes to employees.

To report suspected FWA events and activities related to external parties (such as provider, pharmacy, and member), complete the Referral for Potential Fraud form and email it to Stop Fraud. You may also call the Anti-Fraud Hotline at 800-848-0244.

To report potential fraud by a Premera employee, please reach out to the Internal Audit Department. You may also call the Compliance & Ethics Hotline at 888-418-1537 if you prefer to report anonymously.

Management-level employees who are informed, or otherwise become aware, of suspected internal fraud must immediately report the suspected internal fraud to Internal Audit.
Compliance with the law

Nondiscrimination of services or healthcare benefits
We are committed to a culture of integrity, ethical business conduct, and compliance with all applicable state and federal laws and regulations. It is our policy not to discriminate on the basis of race, religion, color, national origin, sex, age, marital status, veteran status, gender, gender identity or expression, sexual orientation, genetic information or disability, or other protected categories under federal, state or local law. All employees are apprised of this policy and held accountable for compliance.

Doing business with the government
Premera contracts with the United States government and state and local governments. Doing business with the government means special laws and regulations must be followed. Penalties associated with a violation of these laws and regulations can be severe.

Please note that employees of the Federal Employee Program’s Director’s Office of the Blue Cross Blue Shield Association are not considered government employees; however, the perception of conflicts of interest should still be avoided.

Some key areas of working with the government are explained in the following sections. See Appendix A for a list of the major federal laws applicable to Premera by virtue of the federal programs and federally supported programs in which Premera participates.

Offering gifts or business courtesies to government employees
Government employees may not accept anything of value from a business, including current or potential third parties. Money, gifts, services, entertainment, or anything else of value may not be offered to any government employee. If you have any questions about these requirements, contact Congressional and Legislative Affairs or Regulatory Compliance & Ethics.

Q: I work in Claims and have been working very closely with someone from Medicare. She has been very helpful in explaining how we need to handle secondary payments. Can I send her a small gift to thank her?
A: No, you cannot send anything of monetary value to a government employee. Sending a nice thank you card or email would be appropriate.

“Our deeply rooted commitment to Doing the Right Thing is reflected in our reputation with regulators, who routinely express their appreciation for our work.”
Kitti Cramer, EVP, Chief Legal & Risk Officer
Exclusion from government programs

Exclusion means that, for a designated period, Medicare and other federal healthcare programs will not pay for services performed or ordered by the excluded party. Published information for excluded individuals and entities is reviewed regularly by Premera. Anyone found on the list that is employed or retained by Premera is notified and given the opportunity to provide proof that they are not excluded. Exceptions may be made for sanctioned providers if they do not participate in a federal or federally funded healthcare program.

If you have been debarred, excluded, or suspended from working with any governmental agency, you must immediately notify Regulatory Compliance & Ethics.

Employment of government personnel

There are laws that restrict the type of employment that may be accepted by former government employees. These rules depend on the agency involved, the type of position that was held, and the potential position at Premera.

Before interviewing or making a job offer to a former or current government employee, you should work with Employee Experience to determine if their previous government employment could be a conflict of interest.

Preparation and submission of accurate reports

Federal and state healthcare programs have strict 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.

Q: I work in Finance and am responsible for preparing a regulatory filing every month. We recently changed systems and I’m concerned the data is incomplete. What should I do?

A: Discuss the situation with your management. If there are differences between what you used to report and what you are currently reporting, there could be data that wasn’t accurately converted. This needs to be resolved immediately, and any past reports with inaccurate data should be resubmitted. Contact Regulatory Compliance & Ethics for additional guidance.
Government requests for information

It is Premera’s policy to cooperate with every reasonable request of federal, state, and local authorities that need information concerning Premera. At the same time, Premera is entitled to the safeguards provided by law. For example, Premera may be asked for Protected Personal Information (PPI) that is protected by federal and state privacy laws. In this case, we would be obligated to ensure that the agency is allowed to receive PPI and, if they can, we may request special protection for it.

If you receive a request for information, either on our campuses or outside the workplace, you must contact the Regulatory Compliance & Ethics department for help. If you receive a request for employment information for a current or former Premera employee, you must contact Employee Experience.

Medicare Advantage requirements and responsibilities

Employees and Board Members are responsible to engage in Medicare Advantage compliance, fraud, waste, and abuse (FWA), and job-specific compliance training and education. We all have a duty, under law, to comply with the requirements of the Medicare Advantage Program. By participating in Medicare Advantage, Premera is considered a federal contractor and is subject to additional compliance requirements under the Office of Federal Contractor Compliance Program (OFCCP).

Fair competition

We are committed to complying with federal antitrust and state fair competition laws. To comply with these laws, you should not:

- Discuss pricing, bids, discounts, promotions, costs, and the like with competitors
- Make agreements with competitors to allocate customers or divide markets
- Discriminate for or against customers on any basis other than underwriting criteria
- Make false or deceptive statements about our products or services

Before considering any type of arrangement with competitors, consult with Legal or Enterprise Vendor Management and Contracting.
Compliance with the law

Political activity, lobbying, and contributions

We encourage everyone to be active in the political process. All political activity must be conducted outside of working hours and away from our campuses. Additionally, you must not represent, or appear to represent, Premera.

All political activity and political contributions on behalf of Premera must be coordinated through Congressional and Legislative Affairs. Unless it is a Premera-sponsored activity, you must not:

• Seek payment or reimbursement of campaign contributions or fundraising costs
• Use Premera property or employees for campaign activity (examples include using our equipment to send invitations for fundraising events or assisting in a campaign during work hours)

All lobbying on behalf of Premera must be coordinated through Congressional and Legislative Affairs. Unless you have been approved previously by the VP of Congressional and Legislative Affairs, you must not:

• Contact government officials regarding Premera’s position on legislation, regulations, or other policies
• Represent or negotiate Premera’s position on developing legislative language to industry colleagues, trade associations, or other interested parties

Media relations

Our reputation is one of our most valuable assets. To protect it, Corporate Communications oversees media relations. Any inquiry by the media concerning Premera’s official position relating to our policies, practices, or actions must be directed to Corporate Communications. If someone from a media organization contacts you seeking Premera’s position on an issue, do not make any comments, but refer the reporter to Corporate Communications. All press releases concerning Premera must be approved by Corporate Communications.

Trademark and brand usage

Third parties have an interest in leveraging their relationship with Premera and will occasionally ask for endorsements or use of our tradenames and logos. There are strict guidelines on these actions and any requests from third parties must be reviewed and approved by our Brand Management and Legal departments in advance of any such use.

For more information about interacting with the media, please contact Corporate Communications.

Q: Someone who said they are from the Office of the Insurance Commissioner (OIC) called me at work today and asked a bunch of questions about one of our new products. I didn’t know who it was so I told them I’d have to call them back. Was that okay?

A: Yes, that was the appropriate action to take. Whenever you receive a request from someone stating that they are from a state or federal insurance department, you must refer the call to Regulatory Compliance & Ethics unless you have been authorized to answer inquiries previously. Please contact Legal or Regulatory Compliance & Ethics for additional assistance.
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 expense reports that do not accurately reflect the true nature of an expense, is not allowed.

Providing false information verbally and/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.

Electronic communications
Premera provides communication systems for your use, but these should be used primarily for business purposes. Personal use is permitted on a limited basis. Please remember that all usage must be in compliance with corporate and departmental 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.

Do not use Premera resources to send offensive communications, including jokes or graphics, which would violate our policies regarding unlawful retaliation, harassment, and discrimination. You are expected to conduct all communications in a professional and respectful manner.

Use of company assets
Delivering excellent service includes working efficiently and using Premera’s assets in the way they are intended to be used. Premera’s assets include, but are not limited to:

- Equipment
- Company property and buildings
- Corporate funds
- Office supplies
- Employees’ work time
- Business strategies and plans
- Financial data, records, and work files
- Other confidential information about our business and our customers

Our assets must not be used for personal gain or for the benefit of others. Assets are the property of Premera and must not be transferred to others outside the course of normal business.

Q: What should I do if I suspect my manager is using company funds for personal use?
A: Employees with a reasonable basis for believing internal fraud has occurred have a responsibility to report such incidents to the Internal Audit Department. Premera prohibits employees from engaging in retaliation, retribution, or any form of harassment against an employee for reporting fraud-related issues or concerns in good faith, or for participating in or cooperating with an investigation.

There are many Cybersecurity policies that apply to all employees.

- Access Permissions
- Computer, Network, and Telephone Usage
- Computer Passwords
- Cybersecurity Incident Response
- Device and Media Controls
- Email and Other Electronic Communications
- Encryption
Protecting our data

Premera's confidential information

Confidential information is Premera customer information and any information about Premera, Premera's business or employees, or any third party doing business with Premera that is not generally available to the public. Improper use or disclosure of this information could cause harm to the company. We are all expected to actively protect Premera's confidential information. Please remember that this holds true even if an employee leaves Premera.

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

- Protected Personal Information (PPI), which by definition includes Protected Health Information (PHI)
- Financial data
- Internal systems data
- Pricing or product information
- Sales/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
- Vendor contracts, terms, and pricing

Premera's trade secrets

Employees 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 broadly protects Premera's trade secrets, which includes an employee's work on confidential projects and business strategies for Premera. The WUTSA prohibits employees from disclosing not only written or electronic documents, but also information recreated from memory. An employee's obligations to protect Premera's trade secrets continue even after the end of their employment with Premera.

Q: Is it okay to share Premera information with my sister who works at Kaiser Permanente and could use the help to do her job?

A: No, you must not use or disclose such information for any purpose other than to perform your job functions. You should take necessary precautions to prevent the inadvertent disclosure of confidential information to others.

Please note, if a family member works for a competitor or supplier, including any provider of medical services, or is employed by a governmental agency that may interact with Premera, it must be fully disclosed to Regulatory Compliance & Ethics.
Protecting our data

Protecting PPI and confidential information

Protecting PPI and confidential information requires constant vigilance. For example, you should always be careful about discussing matters related to work being done at Premera in public places and even in the common areas within Premera. It is important to make sure that discussions involving member PPI and/or confidential information are only conducted around employees who are authorized to have access to such information and have a need to know the information to carry out their duties for Premera.

Marking documents

One way to protect confidential information is to ensure it is appropriately marked. The chart below contains basic information about marking your documents. For additional information, please see our Marking Guidelines.

Retention of records

There are also laws and regulations about the length of time we must retain our company records. If Premera is involved in litigation or a government investigation or audit, related records cannot be destroyed until the matter is closed. Destruction or alteration of documents related to a legal or regulatory matter is prohibited.

Before destroying any records, refer to the Records Management policy. You can also consult with your records coordinator or visit the Data Governance site.
Employees’ confidential information

We keep employee confidential information secure and take necessary precautions to prevent the accidental disclosure of information to others. Examples of information concerning employees that we consider confidential and do not disclose to others include, but are not limited to:

- Medical or claims information
- Social Security and bank account information
- Wage and salary information
- Performance information
- Reasons for termination of employment
- Demographic Information such as age and address
- Other personal information

You must have approval to access employee data. You may not have access to your data or your family members’ data. It is never allowed to review the data of a family member or even your own as part of your work. If you need this information, you may access it only through your member portal. If you have access to employee data and you are not on the authorized list of users, please email the Group 14-16 mailbox immediately. If you’ve had past access and no longer need access to this data, please have your manager submit a ServiceNow ticket to remove access.

Pay transparency

As a federal contractor, regulations require Premera to inform employees of their rights as they relate to disclosing their compensation (pay transparency). Premera does not discriminate, take corrective action, or terminate an employee’s employment for discussing or disclosing their own or another employee or candidate’s compensation information, unless confidentiality of pay information is a requirement of the job. This includes, but is not limited to, managers, HR professionals, and payroll professionals. The following policy statement confirms Premera’s commitment to confidentiality while remaining compliant with the regulations. In this statement, “contractor” means Premera.

Pay Transparency Nondiscrimination Provision: The contractor will not discharge or in any other manner discriminate against employees or applicants because they have inquired about, discussed, or disclosed their own pay or the pay of another employee or applicant. However, employees who have access to the compensation information of other employees or applicants as a part of their essential job functions cannot disclose the pay of other employees or applicants to individuals who do not otherwise have access to compensation information, unless the disclosure is (a) in response to a formal complaint or charge, (b) in furtherance of an investigation, proceeding, hearing, or action, including an investigation conducted by the employer, or (c) consistent with the contractor’s legal duty to furnish information. 41 CFR 60-1.35(c)
Protecting our data

Confidential information of others

We keep confidential information about Premera’s customers, suppliers, and others secure and take necessary precautions to prevent the accidental disclosure of this information.

This information must also be protected from improper use and disclosure and be handled appropriately according to applicable law and Premera’s established 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 former employer’s confidential or proprietary information.

Insider trading

Although Premera is not a publicly traded company, employees may become aware of non-public or “inside” information about other companies that may be material to or influence an investor’s decision to buy or sell securities. If you become aware of such information, you may not use it to buy or sell securities of that company, and you may not share that information with others.

Customer privacy

We are committed to complying with federal and state privacy laws, including the HIPAA privacy regulations, that protect financial and health information of our customers. We use 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 whereby we are focused on two core values: The customer is the center of all we do and Do the right thing.

EMPLOYERS – We believe in providing the appropriate level of information to employer groups and their producers while minimizing the employers’ obligations under the law.

We create, collect, receive, maintain, transmit, use, and disclose Protected Personal Information (PPI), such as name, date of birth, address, and claim information, to pay claims and otherwise serve our customers. Our policies and procedures are designed 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 department’s Privacy Liaison or Premera’s Privacy Program staff.

Where appropriate, we use technical and/or physical security safeguards to ensure our privacy policies are followed.
Protecting our data

Employee privacy
Premera maintains a culture of the highest ethical standards to protect the privacy and security of Premera Technology Resources. We expect company resources to be used in ways that are consistent with Premera's business interests and align with the Code of Conduct.

You may have access to Premera Technology Resources to conduct business on behalf of Premera. You are responsible for following all policies, procedures, and standards. All Premera Technology Resources and the data stored on them are and remain at all times the property of Premera. As you have access to Premera Technology Resources, you should have no expectation of privacy when using company equipment. Activity using any Premera Technology Resources may be monitored at any time without notice.

Customer security
We are committed to ensuring the security of our facilities and electronic systems to prevent unauthorized access to Premera’s and our customers’ PPI.

We are expected to be aware of and follow established corporate and departmental policies, processes, and procedures that are designed to secure our buildings and electronic systems in compliance with HIPAA security requirements. We are all responsible for maintaining the security of our campuses and buildings.

Social media, cloud storage, and file transfer websites
Premera does not allow employees to use company assets to access and use social media sites, cloud storage sites, or file transfer websites that are not approved by Premera. Widespread use of such sites in the workplace can lead to increased risk of unauthorized disclosure of Protected Personal Information (PPI), as well as increased risk of a malicious software infection.

Corporate Communications decides who, officially, represents Premera and may post information to social media sites about our company and our products. This includes answering questions from customers and other consumers. If you are not appointed to officially represent Premera, please ensure that any comments you make about Premera are clearly labeled as personal comments. If you have been approved to access social media sites from Premera assets, you are expected to use your best judgment when using social media, just as when you use the phone or email. Use of social media must not interfere with the amount or quality of your work. When in doubt, discuss performance expectations with your manager.

Q: If I need to send a file for business purposes that is too big to send via email, what should I do?
A: Never upload PPI or other business information to a file transfer website unless this has been specifically approved (check with your manager or your department’s Privacy Liaison if you aren’t sure). Instead, open a ServiceNow ticket with the Electronic Transmission Center for assistance with other secure options.

Q: Who can I talk to for more information about social media?
A: You can contact Corporate Communications.
Protecting our data

Social media, cloud storage, and file transfer websites
Use good judgment when posting images such as clip art and photographs or including them in emails or other communications. If you take photographs in the workplace and share them online, you should ensure that no work products, including images such as your computer screen, team noticeboards, and company documents, are visible. You should also be sure not to share pictures of other employees without their permission.

Also, remember that many of our corporate and departmental policies apply to online activities, such as the prohibition on sharing PPI. Specifically, employees must not disclose PPI or any other Premera confidential or proprietary information online. Just as PPI may never be sent via email without first being marked “confidential” to encrypt and secure it, PPI may never be sent to either an internal or external recipient via an Internet file-transfer cloud service website without specific approval from 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.

“Privacy is about trust. If we don’t protect our customers’ most valuable information, we won’t have their trust or their business.”
Chris Brandt, Privacy Official
Conflicts of interest
Conflicts of interest

Duty of professional loyalty and conflicts of interest

All employees and others engaged to perform services on our behalf have a duty of professional loyalty. This means business decisions must be based on the best interests of Premera. They cannot be motivated by personal desires or relationships. If that occurs, it is a conflict of interest.

Conflicts of interest can happen if your activities or interests influence or appear to influence your job performance. 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 your work.

Each employee must avoid actual conflicts as well as the appearance of a conflict. You are expected to review this Code and related policies in order to identify possible conflicts. 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
- Providers
- Third parties
- Non-employees, which includes contingent workers and outsourced service workers
- Business partners (such as producers and brokers)
- Competitors
- Other employees

If you have questions about an activity, situation, or relationship that might cause a conflict of interest, discuss it with your manager. If you believe that a potential conflict exists, it must be reported to Regulatory Compliance & Ethics. Do not wait until the annual Conflict of Interest process to report. Early reporting allows for timely resolution. We will work with you to develop a plan to address the conflict.

Reporting relationships

Conflicts of interest can also exist in reporting relationships. You must not supervise or work for a family member or someone with whom you have a close personal relationship. This could create the perception of favoritism or special treatment. Should a close personal relationship develop after the reporting relationship is formed, discuss this with your management and Employee Experience.

Employees who have family member(s) working at Premera are required to report family relationships to management and Employee Experience when they change jobs, have a change in job responsibilities, transfer internally, have a change in leadership, or have any change to their employment situation in which their family relationship may create any actual or perceived conflict of interest.
Conflicts of interest

Outside activities
You must also avoid other employment or activities that impact your job at Premera. This includes anything that could negatively affect:
- Your work hours, job responsibilities, or quality of work
- Your obligations to Premera
All outside employment must be disclosed to your manager and Regulatory Compliance & Ethics.
Medical professionals employed at Premera are expected to have a clear understanding of their roles and responsibilities while working on behalf of Premera, especially if their work at Premera excludes actions that would normally be taken in a clinical practice. Unless otherwise stated in the scope of work performed for Premera, medical professionals at Premera are not to treat, prescribe treatment, or render prescriptions to other employees, non-employees, or customers while working on behalf of Premera.

Personal financial gain
You must avoid activities or actions that might influence or appear to influence your job at Premera. The chart below contains examples of potential conflicts and what should and shouldn’t be disclosed.

<table>
<thead>
<tr>
<th>SITUATION</th>
<th>NEED TO DISCLOSE?</th>
</tr>
</thead>
<tbody>
<tr>
<td>Applying for a position in Claims and your sister-in-law is one of the Team Leads</td>
<td>Disclose</td>
</tr>
<tr>
<td>Have a second job at Macy’s</td>
<td>Disclose</td>
</tr>
<tr>
<td>Neighbor works at Regence</td>
<td>Don’t Disclose (but don’t share confidential and proprietary information)</td>
</tr>
<tr>
<td>Significant other is a board member for PalAmerican (Physical Security third party)</td>
<td>Disclose</td>
</tr>
<tr>
<td>Cousin works at Kaiser Permanente but I never talk to him</td>
<td>Disclose</td>
</tr>
<tr>
<td>Best friend works at Providence</td>
<td>Don’t Disclose (but don’t share confidential and proprietary information)</td>
</tr>
</tbody>
</table>

Q: I have a side business that sometimes requires I make personal phone calls during Premera work hours. Is that okay as long as my work is getting done?
A: No, you should not be using Premera property or your work time at Premera for a side business.

 Corporate opportunities
You must not profit from opportunities that are discovered through your job at Premera. This includes the use of Premera property or confidential information for personal gain or for competing with Premera.

“When we work together, the whole is greater than the sum of the parts.”
Dave Braza, EVP, Healthcare Informatics & Chief Actuary
Conflicts of interest

Intellectual property

All intellectual property used, created, or developed within the scope of your employment, whether by you alone, or with other Premera employees, continues to belong to Premera. This includes, among other things, work-related ideas, concepts, algorithms, innovations, inventions, discoveries, copyright protected works, source code, trade secrets, know-how, and confidential information.

However, you retain ownership of intellectual property, including inventions, which you developed entirely on your own time and without use of Premera’s equipment, supplies, facilities, or trade secret information, unless (a) the invention relates (i) directly to the business of the employer, or (ii) to the employer’s actual or demonstrably anticipated research or development, or (b) the invention results from any work performed by you for Premera. See Appendix C for links to applicable Washington law regarding the assignment of employees’ rights to invention.

Kickbacks and rebates

You and your family may not receive a personal kickback or rebate as a result of the purchase or sale of goods and services for Premera. Kickbacks and rebates can take many forms and are not limited to direct cash payments or credits. Generally, if you or your family stands to gain personally through the transaction, it is prohibited. Such practices are unethical and may be illegal. If you have questions about a transaction, you should contact your manager or Regulatory Compliance & Ethics.

Bribery, corruption and improper payments

We do not directly or indirectly solicit, accept, offer, promise, authorize, or give bribes or other improper payment to or from anyone. This includes facilitation payments. No payment or benefits, other than those approved by Premera, may be made to customers or prospective customers as an incentive to buy our products. The use of Premera funds or assets for any unlawful or unethical purpose is prohibited.

Payments to producers, representatives, and consultants

All agreements with producers, sales representatives, third parties, and non-employees 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 fairly priced for the value of the services rendered.

Q: I am a database developer and while working on a Premera project, I came up with an idea for a new health database that I’d like to sell. Since this is my design, can I do that?
A: No, you cannot sell something you created while employed at Premera if it is related to the work you do here.

Q: My brother-in-law owns a restaurant and I often buy gift certificates from him to give to Premera employees and clients. In exchange, he sometimes buys me dinner. Is this okay?
A: No, a kickback is anything received from a third party for sending business their way. This could include gift cards, dinner, or other types of “perks.” You should not accept gifts from your brother-in-law, and you should also disclose this relationship on your Conflict of Interest survey.
Conflicts of interest

Gifts and gratuities

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 the highest level of integrity. Gifts should not be solicited from our customers, third parties, or business partners. You may not accept gifts of cash under any circumstances from these parties.

You and your family members may accept unsolicited, non-cash gifts from a third party or business partner, or potential third party or business partner if the gift is nominal in value. A useful guideline is that gifts under $75 are normally considered nominal. Regulatory Compliance & Ethics should approve acceptance of all gifts that are not promotional in nature.

Gifts or entertainment must be provided in an honest and transparent manner. They must be designed so as not to influence you, nor be perceived as influencing you, and they must be appropriate to the occasion and to the position of the third party and the recipient. Below are some examples of when it is and isn’t appropriate to accept gifts from third parties and business partners, or potential third parties and business partners:

<table>
<thead>
<tr>
<th>USUALLY OKAY TO ACCEPT:</th>
<th>USUALLY NOT OKAY TO ACCEPT:</th>
</tr>
</thead>
<tbody>
<tr>
<td>$200 gift card won during a <strong>random</strong></td>
<td>Cash for dinner</td>
</tr>
<tr>
<td><strong>drawing</strong> at a business conference</td>
<td></td>
</tr>
<tr>
<td>$75 ticket to a sporting event</td>
<td>$100 ticket to a sporting event</td>
</tr>
<tr>
<td>$10 Starbucks gift card from a third</td>
<td>$10 Starbucks gift card from a</td>
</tr>
<tr>
<td>party</td>
<td><strong>government employee</strong></td>
</tr>
<tr>
<td>Birthday gift from your mother who is a</td>
<td>$100 bottle of wine</td>
</tr>
<tr>
<td>contracted provider</td>
<td></td>
</tr>
<tr>
<td>Dinner at a business conference</td>
<td>Travel expenses to the business</td>
</tr>
<tr>
<td>Lunch with a non-employee worker to</td>
<td>Lunch for you and your spouse</td>
</tr>
<tr>
<td>discuss service levels</td>
<td><strong>without the third party</strong></td>
</tr>
</tbody>
</table>

When providing rewards or recognition to their team, leaders are expected to use appropriate judgment. Recognition may be demonstrated by providing some forms of entertainment or gifts. The form of entertainment or gift must be and remain professional and be an appropriate reward for the situation. If alcohol is provided, consideration should be given to whether the participants are comfortable with this type of reward. When providing alcohol at a Premera event, please refer to the Alcohol, Drug, and Substance Use policy and Limited Alcohol Use Guidelines.

Additionally, any event where Premera employees and/or customers are present, whether organized or casually arranged, must demonstrate inclusivity to all employees regardless of race, color, ethnicity, national origin, sex, gender identity and expression, marital status, age, sexual orientation, disability, language fluency, religion, genetic information, and veteran status.

Q: A third party I work with offered me two tickets to a sporting event. Can I accept these?
A: It depends. First find out how much the tickets cost. If each ticket is $50, then you could accept one, but not both. Generally, you can accept a non-cash gift if the value of the gift is under $75 and is not intended to influence you.
Conflicts of interest

Entertainment
Gifts, entertainment, and other things of value are often intended to build relationships; however, gifts and entertainment that appear to compromise your ability to make fair business decisions create ethical issues. You may offer or accept entertainment from a Premera third party or business partner. However, if the entertainment is primarily intended to gain favor, it is not allowed. Before accepting or offering entertainment, you should obtain your manager’s approval. Your manager should contact Regulatory Compliance & Ethics with any questions about the appropriateness of the entertainment. When accepting or providing offers of entertainment on behalf of Premera, all employees are expected to model appropriate behavior.
Workplace conduct
Workplace conduct

Workplace conduct and employment practices

Premera’s Employee Experience department is responsible for overseeing Premera’s procedures for the hiring, promotion, compensation, corrective action, and employment termination of employees. It is your responsibility to read, understand, and comply with Employee Experience’s established policies and guidelines. For more guidance, consult with your manager, your Employee Experience representative, or the policies and guidelines issued by Employee Experience.

Equal opportunity employer

It is the policy of all Premera companies to provide Equal Employment Opportunity for employees and job applicants regardless of race, religion, color, national origin, sex, age, marital status, veteran status, gender, gender identity or expression, sexual orientation, genetic information, disability, or any other protected category under federal, state, or local law. All employees, as well as suppliers of goods and services to the company, are apprised of this policy and are held accountable for assisting in its implementation.

Premera is committed to providing an inclusive work environment that is free of unlawful harassment, bullying, retaliation, and discriminatory behavior. Improper actions, words, jokes, or comments are not tolerated.

This commitment can only be met if all employees treat each other with courtesy, fairness, respect, and dignity. If you experience or observe unlawful harassment or discrimination, you should report your concerns to your immediate manager, an Employee Experience representative, the senior vice president of Employee Experience, or any other Premera officer. Every effort will be made to ensure that complaints of harassment or discrimination are resolved privately and fairly.

Premera’s reputation is one of its most valued assets and is largely impacted by the conduct of its employees. Accordingly, employees are responsible for conducting themselves in a professional manner. See the Performance Improvement and Corrective Action policy and the Employee Conduct policy for additional information.

Workplace violence

If you experience or have knowledge of any threatening behavior, you should immediately report it to Security, Employee Experience or your manager. Our work environment is expected to be free from acts of violence, threats, harassment, intimidation, or other disruptive behavior.

This policy applies while you are at work or while conducting company business. All threats (even in jest) are serious and may result in corrective action, up to and including termination of employment.
Workplace conduct

Safety, health, and environment

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

Visit the Real Estate & Facilities internal website for additional information on how to request maintenance and/or repairs, and to report safety and security issues. Visit the Worker’s Compensation internal website for more information on what to do in case of a workplace incident.

Drugs and alcohol

Premera maintains an alcohol, drug, and substance-free environment for all employees, which includes any illegal or controlled substance, and marijuana. Premera prohibits the manufacture, possession, distribution, dispensation, or use of any drug or substance that when ingested could alter behavior or affect the ability to perform work on any Premera campus or while conducting business-related activities off company premises.

The legal use of prescribed drugs is permitted on the job only if it does not impair your ability to perform the functions of your work effectively and in a manner that does not endanger yourself or others. If you have any questions about the effect of such medication on your job performance, you should consult with your manager or the Employee Experience department.

When representing Premera at a meeting or social event, employees must not use alcohol to the point of impairment. Employees are expected to use good judgment at all times at events serving alcohol and are responsible for their own conduct during the event and thereafter. Employees may be held liable under state and local law if they become intoxicated and damage property or injure others.

Q: I just hurt myself; should I tell someone?
A: Tell your manager or a member of Premera’s Safety Committee. You also need to complete an Incident Report Form, which can be found on the Worker’s Compensation internal website.

Q: I’m attending a conference and will be meeting people from other Blues plans. Am I able to have an alcoholic drink during the social event?
A: Yes; however, when representing Premera at a meeting or social event, employees must not use alcohol to the point of impairment. Employees are expected to use good judgment at all times at events serving alcohol and are responsible for their own behavior during the event and thereafter.

“Our purpose comes to life by living our values.”

Cecily Hall, EVP, Employee Experience
Reporting suspected noncompliance
Reporting violations and seeking guidance

We need you to help protect Premera from actions that could harm our operations, reputation, or future growth. All employees are therefore expected to report actual or suspected violations involving:

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

You may talk to your manager, Regulatory Compliance & Ethics, or Employee Experience. If you’d like to be anonymous, you may contact the Compliance & Ethics Hotline, our third party-managed hotline. Simply call 1-888-418-1537 or go online to www.MyComplianceReport.com (Access ID: PBC), 24 hours a day, 7 days a week. Remember, we have a policy that prohibits retaliation and intimidation for a good faith report.

If you choose to report anonymously, please 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 additional information is not needed.

If you are a manager and an employee reports a possible violation to you, it must be investigated. If you do not have the expertise to research and resolve the issue, contact Regulatory Compliance & Ethics or Employee Experience. Each incident must be thoroughly investigated, and corrective actions taken if necessary.

COMPLIANCE & ETHICS HOTLINE:
1-888-418-1537
MyComplianceReport.com (Access ID: PBC)

Conducting investigations

When an incident is reported, it may be investigated by Regulatory Compliance & Ethics, Employee Experience, 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.

“Our Regulatory Compliance & Ethics team is your partner. Please contact us with anything you want to discuss. We’d love to hear from you!”

Sven Peterson,
Corporate Compliance and Ethics Officer
Corrective action
When a reported violation is confirmed, we will implement corrective action.
Please note that if you report an incident, you may not be informed of the outcome. This is to protect the confidentiality of those involved in the investigation.
Violations of the Code of Conduct or our policies may be grounds for corrective action, up to and including termination of employment.
Examples of when corrective actions may be taken include:
• Participation in or authorization of actions that violate this Code
• Failure to report a violation
• Refusal to cooperate in an investigation, providing false or misleading information, or withholding information that may be deemed pertinent to the investigation
• Failure of a manager to detect and report a violation, if the failure reflects grossly inadequate supervision
• Retaliation and/or intimidation against an employee who reports a potential violation and/or participates in an investigation in good faith
Self-reporting of a violation will be considered when determining corrective action. Intentional cover-up of violations is prohibited.

Q: I saw something that I think is against corporate or departmental policy, but I’m not sure of all the facts. I don’t want to report something inaccurately and get someone in trouble. What should I do?
A: You can discuss the situation with your manager, Employee Experience, Regulatory Compliance & Ethics, or you can report anonymously using the Compliance & Ethics Hotline. If you choose to report anonymously, please check back frequently to ensure additional information is not needed.

Q: A while back, I reported something through the hotline and nothing happened. Why should I bother to report things in the future?
A: All items reported via the Compliance & Ethics Hotline, or directly to Employee Experience or Regulatory Compliance & Ethics, are thoroughly investigated. There are several reasons it may appear that nothing happened: 1) you didn’t submit enough details for a thorough investigation; 2) no wrongdoing was discovered after the investigation was complete; or 3) corrective action occurred but was not publicized in order to protect those involved. If you feel the situation was not addressed, report it again and include as many specific details as possible.
Appendix A:

Major federal laws regarding federal and federal-supported healthcare programs applicable to Premera

**Anti-Kickback Statute** – 42 United States Code (U.S.C.), Sec. 1320a-7b(b) and Safe Harbor regulations – 42 CFR, Sec. 1001.952; for more information, visit [https://oig.hhs.gov/compliance/safe-harbor-regulations](https://oig.hhs.gov/compliance/safe-harbor-regulations).

**Civil Monetary Penalties (CMPs)** – 42 U.S.C., Sec. 1320a-7a.

**Criminal Health Care Fraud Statute** – 18 U.S.C., Sec. 1347.


**Exclusions** – 42 U.S.C., Sec. 1320a-7; 42 U.S.C., Sec. 1395(e)(1) and Sec. 1395w-27(g)(1)(G); 42 CFR, Sec. 1001.1901.

**False Claims Act (FCA)** – 31 U.S.C., Sec. 3729-3733 and 18 U.S.C., Sec. 287; for more information, visit [https://oig.hhs.gov/fraud](https://oig.hhs.gov/fraud).

**HIPAA – Act of 1996** (P.L. 104-191); 45 CFR Part 160 and Part 164, Subparts A and E.

**Internal Revenue Code of 1986.**

**Patient Protection and Affordable Care Act** (P.L. 111-148) including the amendments made by the Health Care and Education Reconciliation Act of 2010 (P.L. 111-152).

**Physician Self-Referral Law (Stark Law)** – 42 U.S.C., Sec. 1395nn; for more information, visit [www.cms.gov/Medicare/Fraud-and-Abuse/PhysicianSelfReferral](http://www.cms.gov/Medicare/Fraud-and-Abuse/PhysicianSelfReferral) on the CMS website.

**Public Health Service Act** (P.L. 78-410).

**Social Security Act** – Title XVIII.
Appendix B:
Definitions and key indicators of potential fraud, waste and abuse (FWA)

Potential fraud, waste, and abuse (FWA) events and activities related to external parties:

- **Fraud** – Intentionally submitting false information in order to get money or a benefit.
- **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.

**Beneficiary:**
- Does the prescription look altered or possibly forged?
- Have you filled numerous identical prescriptions for this beneficiary, possibly from different doctors?
- Is the person receiving the service or picking up the prescription the actual beneficiary (identity theft)?
- Is the prescription appropriate based on the beneficiary’s other prescriptions?
- Does the beneficiary’s medical history support the services being requested?

**Provider:**
- Does the provider write for diverse drugs or primarily only for controlled substances?
- Are the provider’s prescriptions appropriate for the member’s health condition (medically necessary)?
- Is the provider writing for a higher quantity than medically necessary for the condition?
- Is the provider performing unnecessary services for the member?
- Is the provider’s diagnosis for the member supported in the medical record?
- Does the provider bill the sponsor for services not provided?

**Pharmacy:**
- Are the dispensed drugs expired, fake, diluted, or illegal?
- Do you see prescriptions being altered (changing quantities or Dispense As Written)?
- Are proper provisions made if the entire prescription cannot be filled (no additional dispensing fees for split prescriptions)?
- Are generics provided when the prescription requires that brand be dispensed?
- Are pharmacy benefit managers (PBMs) being billed for prescriptions that are not filled or picked up?
- Are drugs being diverted (drugs meant for places such as nursing homes or hospice being sent elsewhere)?
Appendix B

Definitions and key indicators of potential fraud, waste and abuse (FWA), continued

Wholesaler:
- Is the wholesaler distributing fake, diluted, expired, or illegally imported drugs?
- Is the wholesaler diverting drugs meant for nursing homes, hospices, and AIDS clinics and then marking up the prices and sending to other smaller wholesalers or to pharmacies?

Manufacturer:
- Does the manufacturer promote off-label drug usage?
- Does the manufacturer provide samples, knowing that the samples will be billed to a federal healthcare program?

Plan sponsor:
- Does the sponsor offer cash inducements for beneficiaries to join the plan?
- Does the sponsor lead the beneficiary to believe that the cost of benefits are one price, when the actual costs are higher?
- Does the sponsor use unlicensed agents?
- Does the sponsor encourage or support inappropriate risk adjustment submissions?

Potential fraudulent activity committed by employees, including officers, and non-employees:
- Assets - means equipment, company property and buildings, inventory, corporate funds, supplies, concepts, business strategies and plans, financial data, records and work files, employees’ work time, intellectual property, and other confidential information about the business and our customers.
- Fraud - means the intentional, false representation or concealment of material fact(s) or information.

Examples of fraud and key indicators may include, but are not limited to:
- Forged or intentional alteration of a check, bank draft, or other financial document belonging to or issued by the company.
- Falsification of time sheets, expense reports, financial or other business reporting documents, or employment records or reports.
- Anomalies in documents and financial statements.
- Unusual situations or reports involving unexpected amounts, frequencies, people, places, and times.
- Misappropriation of funds, securities, supplies or other assets.
- Intentional mishandling or misreporting of money or financial transactions.
- False claims.
- Preparation of intentionally misleading or false financial statements.
Appendix C

Washington revised code § 49.44.140 (requiring assignment of employee’s rights to inventions—conditions)

(1) A provision in an employment agreement which provides that an employee shall assign or offer to assign any of the employee’s rights in an invention to the employer does not apply to an invention for which no equipment, supplies, facilities, or trade secret information of the employer was used and which was developed entirely on the employee’s own time, unless (a) the invention relates (i) directly to the business of the employer, or (ii) to the employer’s actual or demonstrably anticipated research or development, or (b) the invention results from any work performed by the employee for the employer. Any provision which purports to apply to such an invention is to that extent against the public policy of this state and is to that extent void and unenforceable.

(2) An employer shall not require a provision made void and unenforceable by subsection (1) of this section as a condition of employment or continuing employment.

(3) If an employment agreement entered into after September 1, 1979, contains a provision requiring the employee to assign any of the employee’s rights in any invention to the employer, the employer must also, at the time the agreement is made, provide a written notification to the employee that the agreement does not apply to an invention for which no equipment, supplies, facility, or trade secret information of the employer was used and which was developed entirely on the employee’s own time, unless (a) the invention relates (i) directly to the business of the employer, or (ii) to the employer’s actual or demonstrably anticipated research or development, or (b) the invention results from any work performed by the employee for the employer.
Discrimination is Against the Law

Premera Blue Cross (Premera) complies with applicable Federal and Washington state civil rights laws and does not discriminate on the basis of race, color, national origin, age, disability, sex, gender identity, or sexual orientation. Premera does not exclude people or treat them differently because of race, color, national origin, age, disability, sex, gender identity, or sexual orientation. Premera provides free aids and services to people with disabilities to communicate effectively with us, such as qualified sign language interpreters and written information in other formats (large print, audio, accessible electronic formats, other formats). Premera provides free language services to people whose primary language is not English, such as qualified interpreters and information written in other languages. If you need these services, contact the Civil Rights Coordinator. If you believe that Premera has failed to provide these services or discriminated in another way on the basis of race, color, national origin, age, disability, sex, gender identity, or sexual orientation, you can file a grievance with:


Language Assistance