CODE OF CONDUCT

COMMITTED TO ETHICAL BEHAVIOR

Every interaction. Every decision. Every day.

Kansas City

A MESSAGE FROM DANETTE WILSON, PRESIDENT AND CHIEF EXECUTIVE OFFICER

For more than 75 years, Blue Cross and Blue Shield of Kansas City and its affiliated companies ("Blue KC") have been a symbol of stability for our members and in the communities we serve. Our success is attributed to our strong leadership, caring employees, innovative products and excellent customer service.

Our customers, business partners, Board of Directors, colleagues and regulators expect us to conduct our business ethically and in compliance with laws and regulations. Every interaction and every decision must be approached with an unwavering commitment to ethical behavior.

Our Code of Conduct ("Code") gives each of us a foundation to guide our actions. We are each responsible for understanding the Code and applying it to our work. You must take this responsibility seriously – it's not only your reputation, but Blue KC's that is at stake. Thank you for your commitment to conducting business ethically, our continued success depends upon it!

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OUR VALUES

Our values drive our business.

Blue KC is dedicated to conducting business in accordance with the highest standards of ethical conduct and in full compliance with laws and regulations applicable to our business. How we achieve success is as important as success itself.

OUR CODE

Our Code helps put our values into action.

Blue KC's commitment to uncompromising ethics forms the foundation for the Code, which provides us with principles to guide our behavior. The Code sets the tone for conducting business in manner that enhances our success – both individually and corporately.

The Code is part of the broader Compliance Program, which focuses on ensuring that every workforce member understands and abides by the Code, Blue KC policies, and applicable laws and regulations. Both the Code and the Compliance Program are approved by the Board of Directors.

Applicability to Blue KC

The Code applies to employees and Officers working on behalf of Blue KC ("workforce") and members of our Board of Directors ("Board Directors") – no one is exempt.

As used throughout the Code, "Blue KC" refers to Blue Cross and Blue Shield of Kansas City and the following subsidiaries:

- Good Health HMO, Inc.
- Blue-Advantage Plus of Kansas City, Inc.
- Missouri Valley Life and Health Insurance Company

Applicability to Third-Parties

Blue KC also expects contracted third-parties to understand and comply with our Code. This includes, but is not limited to:

- Contractors and consultants
- First-tier, Downstream, and Related Entities ("FDRs") of the Company's health plan operations
- Agents and brokers
- Vendors
- Business partners

YOUR RESPONSIBILITIES

You must follow the Code.

Workforce and Board Director Responsibilities

- Understand and adhere to applicable laws and regulations, the Code, Blue KC policies and contracts – both in letter and spirit
- Act ethically and in Blue KC's best interest – be conscious of how others may interpret your actions and avoid even the appearance of illegal or unethical conduct
- Ask if you don't know how to handle a situation
- Complete required training in accordance with the Compliance Program and other Company policies
- Take responsibility for your actions – if you make a mistake report it promptly so that its impact can be minimized; take initiative to prevent and correct issues
- Report actual or suspected improper conduct as soon as possible
- Fully cooperate with inquiries and investigations

Management Responsibilities

Additional expectations of those with management accountability include:

- Embrace the Code and model the behavior of an ethical leader
- Educate workforce members about the Code, hold them accountable for following it, and encourage them to raise questions / concerns
- When responsible for oversight of third-party contracts, ensure Blue KC's expectations around ethical behavior are appropriately and clearly communicated
- Report actual or suspected improper conduct you become aware of as soon as possible
- Take steps to stop improper conduct when appropriate
- Avoid any form of retaliation against anyone who reports a concern in good faith

Doing the Right Thing

The Code is a great resource, but it cannot address every possible ethical or legal issue that you might encounter.

- If there is a law, regulation or policy to guide your behavior, follow it
- If there isn't, ask yourself:
  - Is it consistent with Blue KC's values?
  - Could it appear wrong to others? (e.g., co-workers, customers, business partners or the media)
  - Do I have enough information to make a good decision?
- If you're not sure, contact:
  - Your manager
  - Other management in your division
  - Corporate Compliance
  - Medicare Advantage and Part D ("MA-PD") Compliance
  - Human Resources
  - Legal

See page 16 for contact information

YOUR OBLIGATION TO REPORT

You must report improper conduct.

You have an obligation to report actual or suspected improper conduct, including violations of laws, regulations, the Code or Blue KC policies.

There are both direct and anonymous options to report concerns. A quick reference is provided below, see page 16 for additional information.

All reports will be thoroughly and promptly investigated. You are expected to fully cooperate with the investigation process. Your confidentiality and/or anonymity will be protected to the extent possible, and in accordance with the law.

Report actual or suspected improper conduct as soon as possible

Corporate Compliance

- Contact the Corporate Compliance Officer (see page 16 for information)
- E-mail: **CorporateCompliance@bluekc.com**
- Use the "Report an Incident" link on InsideBlueKC
- Call the Hotline at 1-844-227-1790 (anonymously if desired)

Medicare Advantage and Part D Compliance

- Contact the MA-PD Compliance Officer (see page 16 for information)
- E-mail: **MACompliance@bluekc.com**
- Use the "Report an Incident" link on InsideBlueKC, select "Medicare Advantage and Part D"
- Call the Hotline at 1-844-227-1790 (anonymously if desired)

NO RETALIATION POLICY

We will not tolerate retaliation.

Retaliation, intimidation or any other form of reprisal against anyone who makes a good-faith report of improper conduct is strictly prohibited. You are also protected when you cooperate in an investigation.

Blue KC takes reports of retaliation very seriously. Retaliation is itself a violation of the Code and should be reported immediately.

CORRECTIVE ACTIONS

We work to correct issues identified.

When a reported issue is confirmed, Blue KC will implement timely corrective actions, both to resolve the issue identified as well as determine and address the root cause.

DISCIPLINARY ACTIONS

Violating the Code has consequences.

Participating in or authorizing improper conduct will result in disciplinary action. Depending upon the circumstances, this could range from coaching up to loss of employment or termination of contract and/or legal actions, as applicable.

Blue KC will report improper conduct to government agencies and/or law enforcement when appropriate.

COMPLYING WITH LAWS AND REGULATIONS

You must conduct our business in accordance with applicable laws and regulations.

There are many federal, state and local laws and regulations that apply to Blue KC. Each of us must be knowledgeable about legal and regulatory requirements that apply to our jobs and adhere to them. Failure to do so could result in civil or criminal liability for both Blue KC and you.

Blue KC has policies and procedures, many developed to keep us in compliance with external requirements, which you must understand and follow.

If you have any doubt as to the appropriateness of an action, be sure to ask your manager, Corporate Compliance, MA-PD Compliance or the Legal Department.

Report any suspected or potential violation of laws or regulations as soon as possible

See page 3 for information

OUR WORK ENVIRONMENT

You must treat others with fairness, dignity and respect.

Each of us must be committed to maintaining a safe and professional working environment.

These principles apply in all our interactions – whether with our colleagues, customers, business partners, regulators or others.

As part of this commitment, we are responsible to follow all laws, regulations and rules that protect us in the workplace, including providing:

- A drug-free work environment
- An environment free of discrimination and harassment
- Equal employment opportunities
- An environment free from acts or threats of violence

We are also each responsible for upholding Blue KC's commitment to diversity and inclusion in a manner that:

Recognizes the differences and similarities in each of us

Leverages our unique strengths

Maximizes our individual and collective potential

If you observe or become aware of actual or suspected improper conduct, remember that you have an obligation to report it. Concerns may be reported to any the following:

- Employee's immediate manager (or next- level manager if the manager is implicated)
- Human Resources
- Any Executive Officer of Blue KC
- Blue KC's Legal Department
- The Hotline at 1-844-227-1790

Please see the Employee Handbook and Workforce Principles Corporate Policy for additional information.

CONFLICTS OF INTEREST

You must act in the best interests of Blue KC.

You have an obligation to perform your responsibilities in a manner that is based on the best interests of Blue KC.

Conflicts of interest can occur when your personal interests influence, or even appear to influence, your ability to act in the best interests of Blue KC. The interests of your family members or others with whom you have a close personal relationship must also be considered, as they may create conflicts of interest.

All actual or potential conflicts of interest must be reported to Corporate Compliance so they can be evaluated. If you are unsure whether your situation may involve a potential conflict, discuss it with Corporate Compliance to be on the safe side.

If it is determined a conflict exists, Corporate Compliance will work with you and your manager to determine appropriate next steps.

See the Conflicts of Interest Corporate Policy for additional information.

Examples of potential conflicts that must be reported so they may be evaluated include:

- Relationships (e.g., secondary employment, consulting, financial interest, board membership) with:
  - Companies doing, or seeking to do, business with Blue KC
  - Competitors
- Receiving gifts, meals, or business entertainment that could give the appearance of inappropriately influencing your actions or decisions
- A third-party paying for travel or lodging expenses for business travel (e.g., visiting a vendor, attending a conference, seminar, or training event)
- Circumstances (e.g., personal business interests or activities, secondary employment) that interfere with your Blue KC job responsibilities, adversely affect the quality of work performed or could negatively impact Blue KC's reputation
- Use of Company resources, information or position for pursuits not related to Blue KC
- Directly supervising or influencing the employment status, performance evaluation, pay or benefits of a relative or others with whom you have a close personal relationship
- Processing business transactions involving yourself, your family or friends

BUSINESS RELATIONSHIPS

Business relationships must be free of even the appearance of improper influence.

Gifts and entertainment can be appropriate in building and maintaining business relationships. However, you must exercise caution because these activities can create an appearance of improper influence or conflicts of interest. This section contains standards to help guide your decisions around gifts and entertainment – including those accepted from and offered to third-parties.

If you encounter a situation that is not covered by the standards in this section, or believe circumstances warrant an exception, you must obtain prior approval from Corporate Compliance.

See the Conflicts of Interest and Purchasing Goods and Services Corporate Policies for additional information.

Gifts and Entertainment Defined

- Gift: Anything of value (e.g., item, activity, discount, privilege) given from a person or entity to another, with the intention that the recipient will use the gift at their personal discretion and within a timeframe of their choosing.
- Entertainment: Activity (e.g., meal, sporting event) where the person(s) or entity sponsoring the activity hosts the recipient.
- If both parties are not present, the activity is considered a gift.

Gifts and Entertainment Standards

- You must not violate any law, regulation or Blue KC policy with regard to gifts and entertainment accepted from, or offered to, a third-party.
- Gifts and entertainment must be associated with a legitimate business purpose based upon the scope and responsibilities of your job.
- Gifts and entertainment must be appropriate and not excessive in the context accepted or offered and, regardless of dollar value, occur infrequently.
- You must not accept or offer gifts and entertainment which could be reasonably interpreted to improperly influence the business decisions of the recipient (i.e., you or a third-party).
- Employees who are involved in vendor selection (e.g., expected or current RFP) must not accept gifts and entertainment from those current or potential vendors.
- You must not accept or offer cash or cash equivalents. Cash equivalents include, but are not limited to, checks, money orders, bank-issued credit/debit cards, gift certificates and gift cards (e.g., restaurants, retailers).
- Gifts may be accepted or offered without prior approval from Corporate Compliance provided they meet applicable standards in the Code and are within the following retail value guidelines:
  - $100 or less per gift
  - Gifts exchanged with a specific third- party entity do not exceed $200 annually
- If you are considering accepting or offering a gift that exceeds the above dollar values, you must obtain prior approval from Corporate Compliance.
- Entertainment does not have the same retail value restrictions as gifts, but must meet applicable standards in the Code.
- Costs related to gifts and entertainment offered to third-parties must be approved by management in accordance with Corporate Policies, and related expenses properly reflected in Blue KC's financial records.

Gifts and Entertainment Disclosure Requirements

You must disclose gifts and entertainment accepted or offered (except business-related meals) to Corporate Compliance, in advance when feasible.

Gifts and Entertainment – Government Business

Additional, oftentimes very strict, rules apply to gifts and entertainment accepted or offered in relation to Blue KC's government business. You are responsible for understanding related Blue KC policies and adhering to them.

If you are unsure of related rules contact Corporate Compliance, or MA-PD Compliance if related to that line of business, prior to accepting or offering gifts and entertainment.

Key areas to consider include interactions with:

- Government employees
- Brokers selling government business
- Members under government programs (e.g., MA-PD, FEHBP)
- Customers who are government entities (e.g., local/state government)
- Providers who service members under government programs
- Vendors who support Blue KC's government business (e.g., First Tier, Downstream and Related entities)

Prize Drawings

The following standards apply to items won through a random prize drawing (e.g., at a meeting or conference):

- You must never enter drawings or accept prizes that could be reasonably interpreted to improperly influence your business decisions.
- Everyone who registers or otherwise enters must have the same opportunity to win.
- The prize must be appropriate and not excessive in the context offered.
- You must disclose prize drawings accepted to Corporate Compliance.

Honoraria

You may receive an invitation from an outside group or organization to make a presentation, participate on a panel or focus group, submit a written paper, respond to a survey or participate in other such activities related to your work for Blue KC. Compensation for these types of activities is referred to as honoraria.

- You may accept gifts only if they meet applicable standards in the Code (see General Standards and Government Business Standards sections above).
- Depending upon the circumstances, it may be appropriate to accept a reduced registration fee for a conference or seminar. However, you must receive prior approval from Corporate Compliance, and MA-PD Compliance if related to that line of business.

Travel and Lodging Expenses

If you are authorized to travel for business purposes, Blue KC will pay for travel and lodging expenses. You must not accept direct or indirect reimbursement for such expenses from any third-party (e.g., customers, vendors, business partners, professional associations).

An exception to this is if reimbursement of certain expenses to Blue KC is specifically included in an in-force contract with the third- party.

Organized Labor / Unions

Federal laws require Blue KC to report payments, gifts, meals, or other items of value provided to members of organized labor. There are also special limitations regarding what can be given or provided to members of organized labor. You are responsible for understanding related rules and adhering to them.

ETHICAL COMPETITION

We maintain the highest standards of ethical professionalism in doing business.

Blue KC treats customers, business partners, competitors, auditors and government entities fairly and ethically.

We support competition based on quality, service and price. You must never attempt to gain a competitive advantage through the use of illegal or unethical business practices.

Contracts for Goods and Services

Agreements between Blue KC and third-parties to obtain goods and services must follow applicable procurement policies and processes.

See the Purchasing Goods and Services

Corporate Policy for additional information.

Competitor and Third-Party Information

You must not solicit or obtain confidential information about a competitor or other third- party in a manner that would be illegal, unethical or would require a person to violate a contractual agreement (e.g., non-disclosure agreement).

Anti-Competitive Behavior

We must be careful not to engage in behavior that could be construed as anti-competitive or an unfair business practice. Such activities may violate federal and/or state anti-trust or other laws and regulations designed to promote fair competition. These laws and regulations are highly complex and carry heavy penalties and even imprisonment for violations.

In any interactions you have with other companies, including other Blue Plans, you must be sure to understand and comply with relevant laws.

If you are unsure of appropriate conduct, or if you find yourself in any of these situations, contact:

- The Legal Department
- Corporate Compliance
- MA-PD Compliance, if related to that line of business

Examples include, but are not limited to:

- Price Fixing – Collaborating with a competitor to decide what to charge for products or other services, or what to pay for services. To avoid any implication of this, you should not discuss pricing or supplier relationships with a competitor.
- Group Boycotts – Agreeing with other competitors to refuse to deal with particular vendors.
- Customer or Market Allocations – Agreements to allocate the market for our goods and services among ourselves and our competitors.
- Unfair or Deceptive Marketing – Advertising which is untruthful or misleading.

Kickbacks, Bribes and Rebates

Various laws (e.g., Federal Anti-Kickback Statute, State bribery statutes) prohibit offering or accepting anything of value to obtain or reward favorable treatment related to the purchase or sale of goods or services. Such activity could be construed as a kickback or bribe – which are not only unethical, but in many cases are illegal.

State rebate statutes prohibit payment or offer of valuable consideration of any kind outside that articulated in policy agreements or provided for in applicable filings, directly or indirectly, to current or prospective customers as an inducement to purchase or remain enrolled in Blue KC's products.

Examples:

- Cash, credits, gifts, meals, entertainment, trips, personal favors
- Forgiveness of a debt
- Free goods or services
- Sale or purchase of goods or services below fair market value
- Compensation for legitimate services at a rate exceeding fair market value

INTEGRITY OF RECORDS AND REPORTING

We maintain accurate and complete records.

Blue KC's business records are critically important to our decision-making processes and to fulfilling our financial, legal and contractual reporting obligations. Business records include all documents and electronic information that belongs to, or is in the custody of, Blue KC.

Examples:

Business transactions with customers and business partners

- Company financial and performance information
- Regulatory attestations and filings
- Information provided to internal auditors, external auditors and government agencies
- Time worked
- Business expenses

To ensure the integrity of recordkeeping and reporting:

- Records and reports must be accurate, complete and properly reflect the true nature of the transactions or events represented in them.
- Accounting and financial reporting activities must be conducted in accordance with applicable laws, regulations, accounting standards and Blue KC policies.
- If errors are identified, take appropriate follow up action to communicate and correct them.
- Never take steps that could impede, improperly influence, or affect the integrity of any audit, review or investigation – whether performed by government, internal or external personnel.
- Records must be retained and disposed of in accordance with applicable laws and regulations and the Records Management Corporate Policy.

INFORMATION PRIVACY AND SECURITY

Sensitive information must be appropriately protected.

We have access to a wide range of sensitive information as part of our work at Blue KC. For example:

- Our customers entrust us with highly personal Protected Health Information (PHI) and Personally Identifiable Information (PII)
- Blue KC entrusts us with valuable proprietary information and intellectual property
- Our business partners entrust us with their intellectual property

Your Responsibilities

Blue KC classifies information into four categories, which drive the safeguards necessary to protect that information from improper use or disclosure.

Category	Examples
Restricted	Passwords, encryption keys
Confidential	PHI, PII, credit card data
Corporate / Internal	Marketing plans, financial data, intellectual property
Public	www.bluekc.com

You must be vigilant in protecting corporate, confidential and restricted information. It is your responsibility to understand and follow applicable laws, regulations, Blue KC policies and procedures, and contract terms.

Contact the Privacy Officer or Chief Information Security Officer with questions or concerns about information privacy and security.

Report actual or suspected inappropriate uses or disclosures of information as soon as possible

See page 4 for information

Intellectual Property

Federal and state laws protect intellectual property. Through your work at Blue KC, you may have access to intellectual property owned by Blue KC or our business partners.

Neither you, nor Blue KC, may use intellectual property outside the terms of related contracts or written agreements.

Intellectual property includes patents, trademarks, service marks, trade secrets, copyrights, proprietary information and inventions or techniques.

Examples:

- Computer software must be used in accordance with applicable license agreements
- Copyrighted books, magazines, papers, presentations, etc. may have restrictions on use and distribution

Practical Steps to Privacy and Security

While these do not take the place of the standards outlined in various Blue KC policies and procedures, they are a good reminder of ways you can protect sensitive information.

- Store hard-copy information in a secured location in your office or work area.
- Destroy hard-copy information appropriately (e.g., shred bins).
- Store electronic information within appropriately secured locations on Blue KC systems or third-party systems that have been approved for use by Information Security. Information should not be stored on personal devices, sent to personal e-mail accounts, etc.
- Lock your workstation or Blue KC-approved mobile device when not in use.
- Ensure your system login accounts and passwords are secure. Do not share them with others or use default/simple passwords.
- Ensure your employee badge is secure. Do not allow others to use it.
- Ensure information is disclosed only to those authorized to access or receive it.
- Guard against inadvertent disclosures of information when discussions might be overheard.

Examples of additional considerations if you work remotely include:

- Ensure information on your workstation or Blue KC-approved mobile device is not viewed by unauthorized persons.
- Ensure work-related phone conversations are not overheard.
- Securely transport, store and dispose of (e.g., shred) hard copy documents.
- Immediately report if equipment you use for business purposes is lost or stolen.
- Never let anyone else, even your family, use your Blue KC access.

Key resources:

- The HIPAA Resource Center
- Confidentiality of Business Information Corporate Policy
- Acceptable Electronic Systems Use Corporate Policy
- Facilities Access Corporate Policy

FRAUD, WASTE AND ABUSE

We are committed to reducing fraud, waste and abuse.

Identifying, investigating and preventing fraud, waste and abuse ("FWA") is important in protecting the healthcare dollars of our customers and maintaining the integrity of our healthcare system.

Blue KC's formal FWA Program incorporates:

- Workforce training and education
- Internal controls (e.g., automated claims system edits)
- Ongoing risk assessments, data mining, monitoring and investigations performed by the Special Investigations Unit

All workforce members and contracted entities are expected to report any FWA concerns to:

- The Special Investigations Unit
- Corporate Compliance
- MA-PD Compliance, if related to that line of business

When appropriate, Blue KC refers suspected FWA to appropriate government agencies and/or to law enforcement for further investigation and follow-up.

USE OF BLUE KC ASSETS

Blue KC assets are to be used for the benefit of the Company.

Blue KC assets should be used for valid business purposes. We each have a responsibility to safeguard them against misuse, abuse, loss and theft. Violating these standards will result in disciplinary action and may result in civil and/or criminal penalties for Blue KC and/or you.

Blue KC assets may not be used for:

- Improper business purposes
- Illegal activities
- Violations of the rights of any person or company protected by copyright, trade secret, patent or other intellectual property protections
- Personal gain
- Unapproved solicitation for personal business or other activities
- Unapproved sale of any services or products
- other than Blue KC's
- Harassment of any type
- Sexually explicit material
- Communications that are inappropriate, inflammatory or derogatory

Examples of Blue KC assets:

- Buildings, furniture, office equipment, supplies
- Company funds and credit cards
- Computer hardware and software
- Electronic voice and data networks
- E-mail systems and Internet access
- Documents, information and records – both paper and electronic
- Corporate or business names, trademarks
- Intellectual property produced while working on behalf of Blue KC
- Your time, as it relates to your responsibilities at Blue KC

THE GOVERNMENT AS A CUSTOMER

We must follow rules applicable to government contractors.

We conduct business with various federal, state and local government entities and agencies.

Examples include:

- Federal Marketplaces, often referred to as Exchanges, in Kansas and Missouri
- Medicare Advantage and Part D
- Federal Employee Health Benefit Program
- ("FEHBP")
- Government entities and agencies that are our customers

The laws, regulations, contracts and program policies that govern those activities are strict and often complex – and we must adhere to them.

It is your responsibility to understand and follow Blue KC's policies and procedures related to our government business. If you have questions or concerns, contact Corporate Compliance or MA- PD Compliance, if related to that line of business.

Gifts and Entertainment – Government Business

Additional, oftentimes very strict, rules apply to gifts and entertainment accepted or offered in relation to Blue KC's government business. You are responsible for understanding related Blue KC policies and adhering to them.

If you are unsure of related rules contact Corporate Compliance, or MA-PD Compliance if related to that line of business, prior to accepting or offering gifts and entertainment.

Refer to page 7 for additional information.

Medicare Advantage and Part D

Blue KC is committed to providing services that meet all contractual obligations and quality standards related to our MA-PD business. It is the duty of Blue KC and its workforce to protect Medicare beneficiaries and Medicare resources from harm.

Blue KC has policies and procedures that provide details related to our MA-PD business. These resources are available on our MA-PD intranet website and Internet website for FDRs. For members of the workforce engaged in MA- PD, as well as FDRs, these policies and procedures are part of new hire training (within 90 days of hire), annual compliance training, and interim updates as needed.

All workforce members involved in administration of MA-PD business, as well as certain contracted entities, must demonstrate their understanding of and commitment to compliance with all program requirements by:

- Undergoing specific training requirements
- Reviewing and understanding the Code and relevant policies and procedures
- Attesting to such review and understanding immediately after being hired or contracted, and annually thereafter

Blue KC also requires certain of its contracted entities' leaders who are responsible for the administration or delivery of MA-PD benefits to attest to their freedom from any conflict of interest in administering or delivering those benefits.

Contact the MA-PD Compliance team for questions or concerns regarding the Code or Compliance Program as they related to that line of business.

False Claims Act

The False Claims Act is a federal law that imposes liability on persons and companies that defraud government programs. Blue KC prohibits any improper receipt from or payment to the federal government.

You must not:

- Knowingly present (or cause to be presented) a false claim for payment or approval
- Knowingly make, use, or cause to be made or used, a false record or statement material to a false or fraudulent claim
- Overcharge the federal government for goods or services

All billing and reimbursement practices must comply with federal and state laws, regulations, guidelines, and policies.

Exclusions from Government Programs

Blue KC is prohibited from using federal funds to pay for services, equipment or drugs prescribed or provided by a provider, supplier, employee or FDR excluded from participation in federal programs by the Department of Health and Human Services' Office of Inspector General (OIG) or Government Services Administration (GSA).

Blue KC has procedures in place to perform ongoing monthly screening of such individuals and entities to ensure they have not been excluded, sanctioned, or otherwise barred from participating in the Medicare program.

If any person or entity has been excluded from participation in the Medicare program or has been convicted of health care fraud, Blue KC will not hire or, if already hired, will terminate that person's or entity's employment, contract, or other engagement with the Company.

Contract Negotiations

Blue KC has a duty to disclose accurate and complete cost and pricing data where such data is required under appropriate federal or state law or regulations. This applies both to government entities themselves, as well as vendors and business partners Blue KC may use in servicing government contracts.

If you are involved in the pricing of contract proposals or representing Blue KC in the negotiation of a contract, you must ensure the accuracy and completeness of all data generated and provided.

The submission of a representation that is false, incomplete, or misleading to a federal government customer can result in civil and/or criminal liability for Blue KC, yourself, and any supervisor who condones such an improper practice.

You must avoid taking unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation, or any other practice that may be considered improper.

GOVERNMENT INQUIRIES

We will cooperate with government agencies.

It is Blue KC's policy to cooperate fully with inquiries from government agencies, including audits, investigations and official requests for information.

If you receive a request from a government agency, please promptly notify the Legal Department so they may assist in responding efficiently and in accordance with applicable laws and regulations.

Prior to providing Blue KC business records in any form or format you must obtain specific authorization from the Legal Department. It is very important that you never mislead or provide inaccurate information to government officials.

EMPLOYMENT OF GOVERNMENT PERSONNEL

We will follow rules related to hiring government personnel.

The federal government regulates the hiring of current or former government personnel in order to prevent a company from gaining an unfair competitive advantage. The terms of these restrictions vary according to employment status and function of the government employee and what that individual's role would be at Blue KC.

Before you enter into employment discussions or negotiations with any former or current federal, state or local government employee, elected official or member of his or her immediate family, the situation must be reviewed and approved by the Legal Department.

POLITICAL ACTIVITIES

Do not engage in improper political activities.

You must not conduct your activities in a manner which gives others the impression you are acting on behalf of Blue KC or otherwise representing Blue KC, unless authorized by the CEO or General Counsel.

Workforce members may not contribute to or endorse any political campaign on behalf of Blue KC without prior approval by the General Counsel or Vice President Government Relations. Contributions may not be made with the expectation of favorable government treatment in return.

If you have personal contact with government agencies, employees or elected officials on Blue KC's behalf through your job responsibilities, you must understand and follow all applicable legal and regulatory requirements. Contact Government Relations or the Legal Department if you have questions.

WHERE TO GO FOR HELP

If you have questions or concerns, contact your manager, other management in your division, or the appropriate resource below – they're all here to help!

Questions / Concerns Related to:	Contact:
Corporate Compliance Includes laws, regulations, the Code or Blue KC policies	**Brian Schatz** • Chief Compliance Officer (816) 395-3479 • Call the Compliance team at 816-395-CALL (2255) • E-mail: CorporateCompliance@bluekc.com • Use the "Report an Incident" link on InsideBlueKC • Call the Hotline at 1-844-227-1790 • (anonymously if desired)
Medicare Advantage and Part D Compliance Contact MA-PD Compliance for items related to this line of business	**Abigail Roa** • Medicare Advantage and Part D Compliance Officer (816) 395-2023 • E-mail: MACompliance@bluekc.com • Use the "Report an Incident" link on InsideBlueKC, select "Medicare Advantage and Part D" • Call the Hotline at 1-844-227-1790 • (anonymously if desired)
Fraud, Waste and Abuse	**Troy Embers** • Manager, SIU & Overpayment Recovery (816) 395-3442
HIPAA Privacy	**Norma McKelvy** • Privacy Officer (816) 395-2198
Information Security	**Yaron Levi** • Chief Information Security Officer (816) 395-2006
Human Resources	**Lisa Aschenbrenner** • Director, Talent (816) 395-2254
Legal	**Mark Newcomer** • Deputy General Counsel (816) 395-2555

While contacting the above resources is preferable in most situations, if you deem it appropriate you also have the option to directly contact the Chairman of the Audit Committee of the Board of Directors.

Audit Committee Hotline:
1-855-461-2767 (anonymously if desired)

Examples may include:

- Significant concerns with financial or accounting practices
- Material violations of laws, regulations, the Code or Blue KC policies

Come by and speak with someone on the Corporate or MA-PD Compliance teams
Click the **Report an Incident** link on Inside BlueKC or call the hotline at **1-844-227-1790**

WHERE TO FIND THE CODE

The Code can be found on the Inside Blue KC intranet website.

The Code is available on Blue KC's external website for FDRs and other business partners.

If you would like a hard-copy of the Code, please contact Corporate Compliance or MA-PD Compliance.

KEY POLICIES AND RESOURCES

The following can be found on the Inside Blue KC intranet website:

- Corporate Policies and Procedures
- MA-PD Policies and Procedures
- HIPAA Resource Center
- Employee Handbook

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