



# **CODE** of **CONDUCT**



# MESSAGE FROM THE PRESIDENT AND CEO

## DOING THE RIGHT THING—EVERY TIME

Many companies talk about being ethical and doing the right thing. But at Western Health Advantage, it's more than talk—it's how we've operated for almost three decades. Our reputation has been built on honesty, integrity, and ethical decision-making in everything we do.

The health care industry is complex and highly regulated, and our shared understanding of ethical and legal responsibilities is essential. That's why we have this Code of Conduct—a guide that outlines how our values shape our decisions and actions. It applies to every member of our workforce, and following it is vital to WHA's ongoing success and our ability to fulfill our mission.

Think of our Code as your go-to resource for making the right choices and finding guidance when questions arise about ethics or compliance. By living these principles each day, we demonstrate what it truly means to do the right thing—for WHA, for each other, and for the communities we serve.

If you ever see or suspect a violation of the Code of Conduct, speak up immediately. No exceptions. Reporting concerns helps us maintain the trust and integrity that define who we are.

Thank you for your continued commitment to our values, for working together to achieve our mission, and for helping us build a business grounded in honor and respect—every single day.



Sincerely,

A handwritten signature in black ink that reads "Khuram Arif". The signature is fluid and cursive, with a large, stylized initial "K".

Khuram Arif, MD, MBA  
President and CEO

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# OUR CODE—OUR RESPONSIBILITY

Western Health Advantage’s (WHA) Code of Conduct (CoC) is a guide to the conduct expected of employees and others doing work on our behalf (collectively, “Workforce Members”). Our CoC gives us the guidance and support we need to conduct our business ethically and to comply with the law.

The CoC will help Workforce Members recognize when a potential ethical or legal issue exists, guide you to make the right decisions, and provide information on how to ask questions or raise concerns. Our CoC represents our commitment to do the right thing. By being part of WHA, you are agreeing to uphold this commitment.

Our CoC is not intended to cover every situation that may be encountered. We must comply with all applicable laws, regulations, and our policies whether specifically addressed in our CoC. In some cases, additional guidance may be needed. In these cases, you should consult with your supervisor, manager, or the Compliance and Ethics Department for additional guidance at [compliance@westernhealth.com](mailto:compliance@westernhealth.com).

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# OUR CODE—OUR RESPONSIBILITY

## MISSION

We expand access to health care and respond to the changing needs of our members, providers, and community to improve the health and well-being of all.

## VALUES

### ACCESSIBILITY

We offer affordable health coverage and facilitate easy access to care, while respecting the relationship between patient and doctor.

### RESPONSIVENESS

We make decisions locally, without delay.

### INNOVATION

We respond positively to the unique and changing needs of our partners and we stay at the forefront of the dynamic health care environment.

### INTEGRITY

We interact honestly with our partners, while building a relationship of trust.

### ACCURACY

We are careful, exact, and precise with our partners and our business, especially when dealing with confidential health information.

### SINCERITY

We are genuine and caring regarding our members' health care.

### COMMUNITY

We affect positive change in our community through charitable outreach and volunteer efforts.

# THE BASICS

## LEGAL, REGULATORY, ACCREDITATION, & ETHICAL REQUIREMENTS

WHA provides health care coverage options to subscribers and members in its approved California service area. Our business is subject to numerous federal, state, and local laws and regulations, which have specific licensure and other requirements. We also choose to hold ourselves to higher and different standards established by accrediting bodies.

Justifiably, we have immense pride in ourselves, each other, our business, our custom service, and our commitment to our community. Thus, we must conduct all our business with integrity and in a professional, legal, and ethical manner, complying with both the letter and spirit of the law.

The purpose of our Code of Conduct is to provide general guidance on subjects of wide interest within our company, but not everything can be covered in as much detail as is necessary in just one document. Our CoC provides an overview of our values and standards. Where applicable, we provide references to other resources, like the law, WHA Employee Handbook, or WHA policies and procedures, so that you can get more detailed information.

## HOW TO GET HELP

If you are faced with an issue or business decision about which you are not sure, consult this CoC, WHA's policies, your supervisor or manager, and/or the appropriate WHA department, for example Compliance and Ethics, Human Resources, or Legal. Our CoC is not intended to cover every situation. We must comply with all applicable laws, regulations, WHA Employee Handbook, and our policies whether addressed in our CoC. Wherever WHA has an internal policy that is stricter than what is required by law, you should follow WHA's policy.

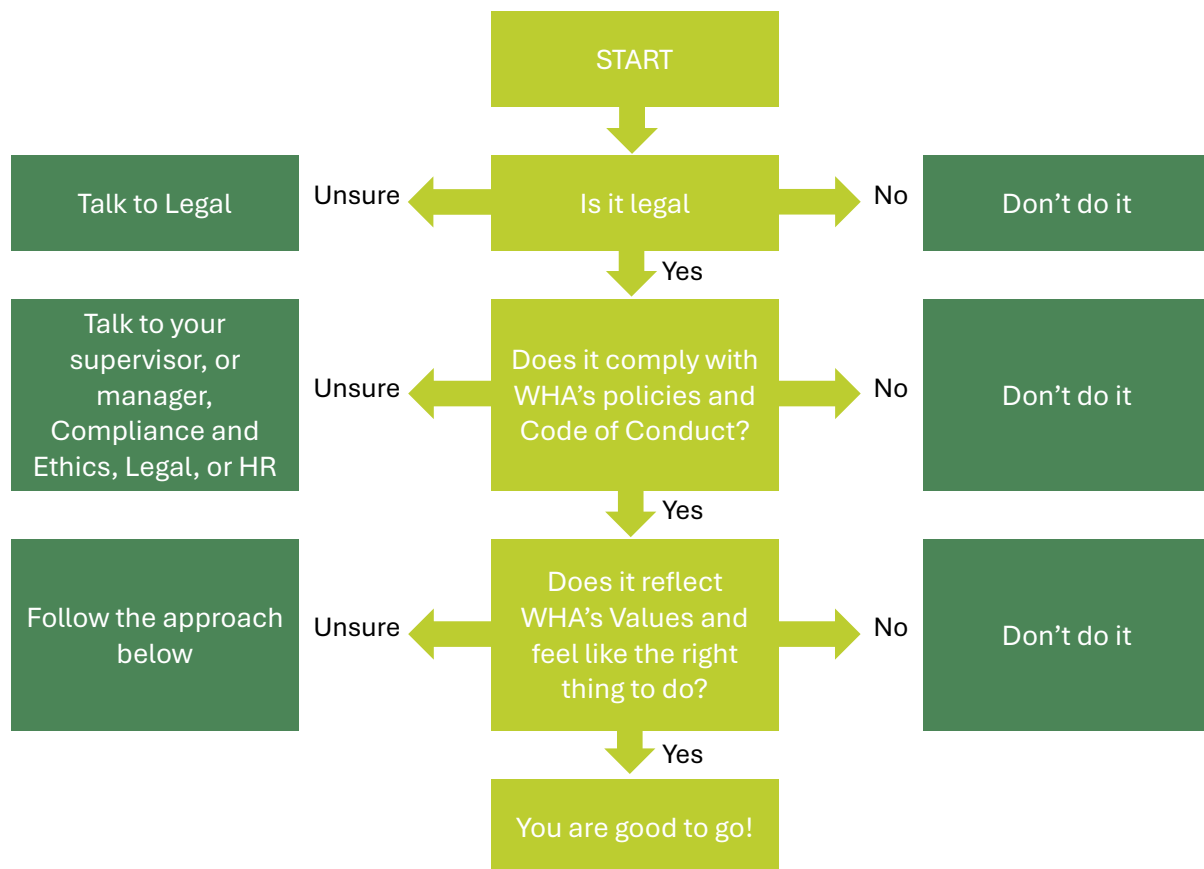
WHA has an open-door policy and there are many resources available to help you do what's right. Look to the last page of the CoC for a list of resources and contacts.

# THE BASICS

## HOW TO MAKE THE RIGHT DECISION

If you are unsure of the right thing to do, ask yourself the questions below. Considering these questions will help you maintain your personal integrity and the best interests of WHA.

- \* Do I have enough information to make a good decision?
- \* Is my action or inaction consistent with WHA's CoC, mission, values, policies, or the law?
- \* Is my decision honest and fair?
- \* Would my decision negatively affect WHA, my colleagues, or our stakeholders, including members, providers, vendors, or the community?



If you are still unsure, consult with others such as your supervisor or manager, Compliance and Ethics, Legal, Human Resources, or any other manager.

# THE BASICS

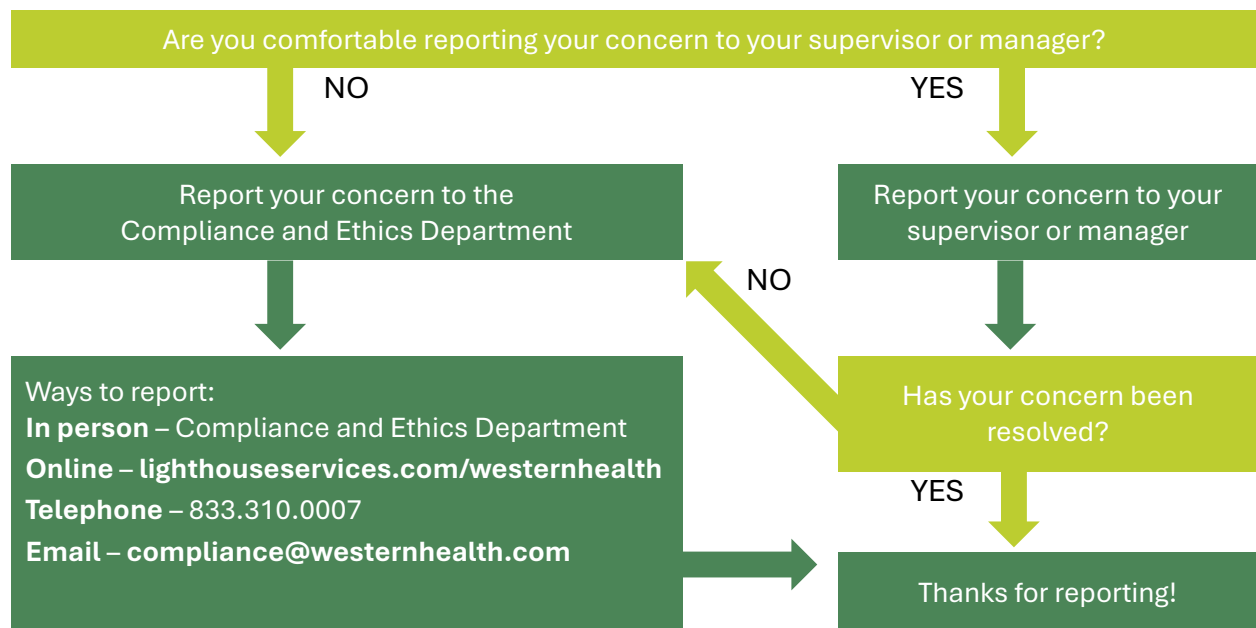
## RAISING CONCERNS

We all have an obligation to report any suspected or observed misconduct, including violations of the CoC, WHA policies and procedures, laws and regulations, and other ethical concerns. Reporting suspected or observed misconduct or other ethical concerns is a condition of employment. We must be committed to do the right thing, which means always speaking up when you have a concern, even if you are not sure your concern is valid.

All reports of a violation must be made in good faith. “Good faith” means you actually believe or perceive the information to be true. Do not make a report if you do not believe in good faith that the CoC, policies and procedures, laws and regulations, or ethics have been violated. Do not twist or make up facts to get someone else in trouble. Appropriate disciplinary action will be taken if information has not been provided in good faith.

WHA provides several ways to report concerns. If you are employee, first, contact your supervisor or manager for help. If you do not want to discuss the concern with your supervisor or manager, or if a concern raised with your supervisor or manager has not been resolved, report your concern to the Compliance and Ethics Department, using the options below.

WHA stakeholders, including members, providers, business partners, and others are also encouraged to report their concerns.



# THE BASICS

# THE BASICS

## THINGS TO REMEMBER WHEN MAKING A REPORT

When you report a concern, please provide as many details as possible. WHA must have enough information to investigate. Reports should include the following information:

- \* What is the issue/concern?
- \* Who is involved or witnessed the issue?
- \* When did the issue occur or first come to your attention?
- \* Where did the issue occur?
- \* Any other relevant details

If you choose to provide your contact information when making a report, but request confidentiality, WHA will make every effort to maintain your anonymity, to the extent permitted by law; however, anonymity cannot be guaranteed.

Reporting your good faith concerns is the right thing to do and will help WHA end or prevent misconduct.

## WAYS TO REPORT CONCERNS

### IN PERSON

The Compliance and Ethics, Human Resources, and Legal Departments have open-door policies. You should feel free to visit them any time to discuss your concerns in person.

### COMPLIANCE AND ETHICS HOTLINE

WHA has a third-party Compliance and Ethics Hotline (Hotline). The Hotline is independent and anonymous. It does not have caller ID or other ways to identify those who report, unless you choose to share your contact information. Reports can be made 24 hours a day, 365 days a year. The Hotline provides interpreters in multiple languages. You will receive a case number and a confidential PIN that only you and the Hotline vendor know. You can use these to check on the status of your report.

 833.310.0007       <https://www.lighthouse-services.com/westernhealth>

### E-MAIL

Your concerns can be emailed to the Compliance and Ethics Department. Note that it may not be possible for you to remain anonymous when reporting through email.

 [compliance@westernhealth.com](mailto:compliance@westernhealth.com)

# THE BASICS

## HOW REPORTS ARE HANDLED

We are committed to investigating all reported concerns promptly and confidentially, to the extent possible. Depending on the concern that is reported, the appropriate department will investigate the allegation. We expect all WHA workforce members to cooperate with both internal and external investigation efforts.

The results of investigations are handled in multiple ways. Where an investigation finds that there was a violation, it is the policy of WHA to take appropriate action, including corrective actions, disciplinary measures, or implementing systemic changes to prevent similar violations in the future, among other things. The exact discipline utilized will depend on the nature, severity, and frequency of the violation.

If you provided your contact information when you made your report, WHA will inform you, to the extent possible, whether the investigation was completed and if the issues were addressed. To protect your and other's confidentiality and privacy, we do not disclose the details of any disciplinary action.

Submit your question/complaint/concern to the Compliance and Ethics Department in person\*, via email\*, in writing, Hotline phone, or online.

\*It is not possible to remain anonymous for reports submitted in person or via email.

### CONTACT INFO INCLUDED

You will receive a response within 48 business hours of receipt of your issue.

### ANONYMOUS

You will receive a response within 48 business hours of receipt of your issue unless you submit your report in writing anonymously.

Reports will be received by the Compliance and Ethics Department to determine the appropriate department to handle. **Potential fraud, waste, or abuse**, or other compliance issues will be handled by the Compliance and Ethics and/or Legal Department. **Privacy related reports** will be handled by the Privacy Manager. **Other issues** will be forwarded to the appropriate department

Report will be investigated to determine appropriate action for resolution. Any corrective action will be reported to the Compliance Director and Compliance Committee. Possible actions include corrective action, disciplinary measures, or implementing changes to prevent similar violations in the future. In some cases, referral to law enforcement may be required.

You will be informed, to the extent possible, whether the investigation was completed and if the issues were addressed. Details of any disciplinary action will not be shared.

If you reported through the hotline, you will be informed, to the extent possible, whether the investigation was completed and if the issues were addressed. Details of any disciplinary action will not be shared.

# THE BASICS

## RETALIATION NOT TOLERATED

WHA has zero tolerance for retaliation against those who make a report in good faith or participate in an investigation. WHA does not condone any act of retribution or retaliation against an individual who conscientiously seeks to follow and implement the CoC, WHA policy, laws, and regulations. We take all claims of retaliation seriously, investigating each one thoroughly and taking appropriate action. If you think you or someone you know has suffered retaliation, report it immediately.

**Q. I feel I should call the Compliance and Ethics Hotline, but I am anxious about it. My manager told me to do something I feel violated our policy and may even be illegal. I am afraid they could make life difficult for me if I raise this. What should I do?**

**A.** It is important that you share your concerns about this potentially serious matter. Rest assured that every call to the Hotline is confidential, and you have the choice to remain anonymous. If you feel that you are being retaliated against for raising your concern, let us know right away. Retaliation will not be tolerated, and swift action will be taken.

**DID YOU KNOW?** *Retaliation against an informant is a Federal and State crime. WHA has a non-retaliation policy to protect those who make a report in good faith.*

## THE SPECIAL RESPONSIBILITIES OF LEADERSHIP

While the CoC applies to all WHA Workforce Members, we expect leadership to set the example, the proper tone-at-the-top, and to be a model of integrity in every aspect.

Those in leadership positions should create an environment where all team members are encouraged and feel empowered to do the right thing and to raise concerns without fear of retaliation. We also expect leadership will ensure their team has sufficient information, training, and resources to comply with applicable laws, regulations, policies, and to be able to resolve ethical dilemmas.

WHA is committed to a culture that promotes the highest standards of compliance and ethics. That starts with our leadership. We must never sacrifice ethical and lawful behavior in the pursuit of business objectives.

# OUR RESPONSIBILITIES TO EACH OTHER

## WORKPLACE MATTERS

We've all heard of the Golden Rule: Do unto others as you would have them do unto you. However, everyone is different. Some people may not want to be treated in the same way you do. Instead, we should follow the Platinum Rule: Treat others the way you want to be treated. It is as simple as that.

### DIVERSITY, DISCRIMINATION, AND EQUAL OPPORTUNITY

We actively seek the diverse participation of all those we work with to achieve success. We value every member of the WHA team and are committed to providing an inclusive environment where everyone is treated with fairness, respect, and dignity. We are accountable to one another for the manner in which we treat each other and for the manner in which people around us are treated.

WHA's goal is to create an environment in which we can all grow, develop professionally, and work in a team environment in which all ideas are considered. We recognize our differences and respect that each individual is unique. We understand and appropriately respond to the unique combination of variables that we embody, such as ability, age, ethnicity, experience, gender, race, sexual orientation, and socioeconomic status.

WHA is an equal opportunity employer. In accordance with applicable law, WHA prohibits discrimination and harassment against employees, applicants for employment, individuals providing services in the workplace pursuant to a contract based on their actual or perceived: race, age (40 and over), religious creed, color, national origin, ancestry, physical or mental disability, medical condition, genetic information, marital status (including registered domestic partnership status), sex and gender (including pregnancy, childbirth, lactation and related medical conditions), gender identity and gender expression to include transgender individuals, sexual orientation, Civil Air Patrol status, military and veteran status and any other consideration protected by federal, state, or local law (collectively referred to as "protected characteristics"). Our commitment to equal opportunity employment applies to all persons involved in our operations and prohibits unlawful discrimination and harassment by any employee, including supervisors and coworkers.

Acting in accordance with these guidelines shows respect, humility, and integrity while helping to create a positive work environment for everyone.

# OUR RESPONSIBILITIES TO EACH OTHER

## Q. What is Equal Employment Opportunity?

A. Equal Employment Opportunity is the policy of treating Workforce Members and others without discrimination.

**DID YOU KNOW?** Under state and federal laws, a person may not be discriminated against due to the following:

- \* Race
- \* Color
- \* Religious creed
- \* Ancestry
- \* Sex and gender
- \* National origin
- \* Age (40 and over)
- \* Marital status
- \* Sexual orientation
- \* Gender identity or expression
- \* Genetic information
- \* Military or veteran status
- \* Civil Air Patrol status
- \* Physical or mental disability
- \* Medical Condition
- \* Protected characteristics

*Does that mean you can discriminate against those not listed here? **No!***

## HARASSMENT AND BULLYING

We are committed to a workplace free from harassment and bullying. We forbid discriminatory harassment based on any characteristic protected by federal, state, or local law.

Sexual harassment is absolutely prohibited. It may take many forms, including unwelcome sexual advances, requests or demands for sexual favors or in conjunction with employment decisions, and other visual, verbal, or physical conduct of a sexual or gender-based nature. This conduct creates an intimidating, hostile, or offensive work environment and is not acceptable in our workplace. WHA has a zero-tolerance policy for this behavior.

Abusive, bullying conduct, including the use of force, threats, or coercion to abuse, intimidate, or humiliate another employee is prohibited. Cyberbullying is also prohibited. Cyberbullying refers to conduct listed above that occurs using a computer, cell phone, smartphone, tablet, pager, or other device that transmits electronic information, regardless of whether the device is owned by or located at WHA or connected to WHA network.

**Q. People in my department often tell sexual and derogatory jokes they think are hilarious. I find them offensive and inappropriate and am uncomfortable when they do this. What should I do?**

# OUR RESPONSIBILITIES TO EACH OTHER

**A.** The behavior you describe is considered harassment, inappropriate in the workplace, and violates our Code of Conduct. If you are not comfortable raising the issue with the individuals themselves or your supervisor or manager, talk to Human Resources. They will protect your confidentiality to the extent possible while taking steps to stop the offensive behavior. You can also raise your concern to the Compliance Department—see the **REPORTING CONCERNS** section for details.

**DID YOU KNOW?** *Employers are liable for harassment by supervisory and non-supervisory Workforce Members if they knew or should have known about the harassment and failed to take prompt and appropriate corrective action. Workforce Members are encouraged to inform the harassed directly that the conduct is unwelcome and must stop. Workforce Members should also report harassment to management as soon as possible to prevent its escalation.*

WHA has adopted a policy that all employees must report to work and, while at work, remain completely free of illegal drugs, abused or non-prescribed prescription drugs, marijuana, and alcohol.

## HEALTH AND SAFETY

WHA's facilities comply with all applicable government regulations and rules that promote the protection of workplace health and safety. Our policies have been developed to protect ourselves and our stakeholders from potential workplace hazards.

We must familiarize ourselves with and understand how our safety policies apply to our specific job responsibilities and seek advice from leadership whenever there is a question or concern. It is important that we immediately advise our supervisor, the Facilities, and Human Resources Departments of any serious workplace injury or any situation presenting a risk of injury, so timely corrective action may be taken to resolve the issue. If a safety issue is an emergency or imminent threat of health and safety, call police, fire, or emergency medical services first, then contact your supervisor or manager and others.

Workplace health and safety also encompasses incidents of workplace violence. WHA will not tolerate violence or threats of violence in any form. In addition, weapons of any kind are not allowed in the workplace or on workplace property unless a specific waiver is granted.

Workforce Members who observe or experience any form of work-related harassment or violence should report the incident to their supervisor or manager, the Facilities, and the Human Resources Departments immediately.

# OUR RESPONSIBILITIES TO EACH OTHER

**Q. My coworker's cubicle is cluttered and has several electrical cords going across the floor. I don't think it's my business, but I'm afraid she's going to hurt herself one day. What should I do?**

**A.** The health and safety of the individual takes precedence over all other concerns. It's up to all of us to prevent accidents when we have the opportunity. Speak to the individual, supervisor or manager, or Facilities Department about your concerns. How would you feel if she tripped and hurt herself, knowing that you could have prevented it? Better to report it and be safe rather than sorry!

**DID YOU KNOW?** *Slips, trips, and falls are the most common workplace injury in an office setting, the primary cause of lost days from work, and caused by:*

- ✱ Tripping over an open desk or file drawer, electrical cords or wires, loose carpeting or objects in hallways/walkways
- ✱ Bending or reaching for something while seated in an unstable chair
- ✱ Using a chair in place of a ladder
- ✱ Slipping on wet floors

*Each year, over 8 million emergency room visits are due to slips, trips, and falls.*

## RELATIONSHIPS

Your immediate family members, significant others, and individuals in your household must never improperly influence your business decisions. These relationships require extra sensitivity to conflicts of interest and confidentiality.

## PERSONAL CAUSES

WHA is committed to supporting our community in several ways and is proud that many of our Workforce Members give back to our community through donations and volunteer work. While it may seem natural to ask those we know to donate or participate, we should recognize that it might be uncomfortable or even offensive to be subjected to pressure to support our colleagues' personal causes. Thus, we may not solicit other Workforce Members or distribute non-work-related literature or materials during work time and in work areas.

# OUR RESPONSIBILITIES TO EACH OTHER

## CONFIDENTIALITY AND PRIVACY

Confidential and proprietary information about WHA, its strategies and operations, and information about our Workforce Members, customers, and business partners, must be protected and is of utmost importance. We should protect the company's confidential and proprietary information, including nonpublic information entrusted to us as Workforce Members by our members, providers, and other business partners. Only access, use, or disclose confidential and proprietary information, whether it is classified as confidential and proprietary, as needed to perform your job responsibilities.

We do not use our personal devices, phones, or email to send WHA confidential and member private information for any reason unless previously approved. The main exception is sending and receiving WHA emails on your personal devices if WHA has approved you to do so.

Confidential and proprietary information includes all nonpublic information that might be of use to competitors or harmful to the company, its members, providers, or suppliers if disclosed. Each of us must respect the confidential nature of this information.

## FRAUD, WASTE, AND ABUSE

At WHA, we are honest and truthful in all our dealings. While anyone can make an honest mistake, fraud is different. Fraud is not a mistake and involves deliberate deception. Not only is fraud unethical, it is also illegal. We will not falsify information, submit false reports or information, improperly change company records, or take any other fraudulent activities, when reporting to the government or anyone else.

WHA has a fraud, waste, and abuse program to prevent, detect, and reduce fraud, waste, and abuse among Workforce Members, providers, business partners, and others. We are entrusted with the monies and resources of our stakeholders, including the government, and must safeguard and use all these resources effectively, conservatively, and wisely.

### **Q. What are the consequences of inaccurate or fraudulent documents?**

- A.** Besides internal discipline up to and including termination, the Federal and State False Claims Acts and other laws impose liability on any person or entity who:
- Knowingly files a false or fraudulent claim for payments to a government funded health care program (including Covered California);

# OUR RESPONSIBILITIES TO EACH OTHER

- Uses a false records or statement to obtain payment from a government funded health care program; or
- Conspires to defraud a government funded health care program

**DID YOU KNOW?** *Besides civil penalties, the government is entitled to three times the amount of damages that the government sustained because of the illegal act.*

## PROTECTING ASSETS

Any use of WHA resources for personal or financial gain unrelated to WHA's business is prohibited. Workforce Members must protect all WHA's assets, both tangible and otherwise. Assets include time, supplies, money, and equipment. For instance, falsifying your timesheet or submitting false reimbursement requests is fraudulent and prohibited.

Among WHA's most valuable assets are its stakeholder and proprietary information and intellectual property. These assets provide WHA with a competitive advantage and helps us provide excellent service. We will protect these assets against theft, loss, or other misuse. We also respect the intellectual property rights and information of third parties.

Company assets must be maintained for business related purposes only. As a rule, the personal use of WHA's assets is not allowed. On occasion, minimal use of resources, such as copying or telephones, where the cost to WHA is insignificant, is permissible.

**Q. I sell real estate on the weekends. I'm having a promotion—can I print my flyers using my work printer? It will be much more efficient than my little home printer!**

**A.** No. Use of WHA assets, such as copiers, are for WHA business purposes only, not for personal use and especially are not to be used for your own personal financial benefit.

**DID YOU KNOW?** *It may also be considered a conflict of interest if outside activities hinder or distract you from performing your job or cause you to use company resources for purposes other than for WHA. Personal use of WHA resources, including, but not limited to, the phone, Internet, and copy machines, should be kept at a minimum.*

# OUR RESPONSIBILITIES TO WHA AND OUR STAKEHOLDERS

WHA has multiple stakeholders, including our Sponsors, Board of Directors, Workforce Members, subscribers, members, providers, business partners (including brokers, vendors, and contractors), the government, and our community. We are committed to each of our stakeholders in many ways.

## DISCRIMINATION, DIVERSITY, AND CULTURAL COMPETENCE

WHA has the privilege of serving a diverse population of stakeholders, including our members. With this privilege comes the responsibility of considering and respecting their cultural and communication needs and values.

Our goal is to provide culturally appropriate health care coverage and customers service that incorporates the diversity of health beliefs, practices, and communication preferences of our members. WHA does not discriminate against members based on any protected characteristic. We consider the individual social, cultural, and linguistic needs of our members to interact effectively, and provide the highest quality of service and communication options, including interpretation and translations in multiple languages, resources for the visual and audio impaired, and other auxiliary aids.

## BUSINESS PARTNERS

We are committed to fair competition among our existing and potential business partners, including brokers, vendors, suppliers, and contractors. We strongly encourage our business partners to adopt this CoC or a comparable code for their industry and comply with it in performing their obligations under our contracts. Just as WHA workforce members are expected to treat our business partners fairly, business partners are expected to conduct business professionally and to allow applicable laws, regulations, and applicable WHA policies and requirements.

Only those workforce members who are authorized to seek contracts on behalf of WHA may do so. No workforce members except the CFO and CEO are authorized to sign contracts. Selecting business partners must be done fairly and objectively. Factors to consider include WHA purchasing policies, the best interests of WHA, affordability, and quality, among other aspects.

When WHA contracts with a business partner, you are responsible for making sure they are providing WHA the promised goods or services. If you have concerns about a business partner, speak to your supervisor or manager, and/or the Legal Department.

# OUR RESPONSIBILITIES TO WHA AND OUR STAKEHOLDERS

## PROCUREMENT

WHA has negotiated contracts with some business partners that enable us to purchase products and services that provide consistent quality at a discounted rate. Where WHA has identified select business partners, using only those will help reduce costs and improve quality. See the Facilities Department for more information about approved business partners.

## INDUSTRY RELATIONS

WHA does not compete against others unfairly. We do not seek to gain an edge through unfair competition. We comply with all antitrust laws and never make arrangements with competitors that create monopolies or stifle competition. We do not illegally obtain or use proprietary information from competitors, nor do we use deceptive or illegal means to gain such information.

**Q. I just joined WHA from one of our competitors. Can I share some confidential marketing information that I developed while working for that competitor?**

**A.** No. This would be a breach of our Code of Conduct, your obligations to your previous employer, and possibly also to the law. You are obliged to protect your past employer's confidential information just as WHA Workforce Members are obliged to protect ours. You can use the general knowledge and skills you learned in your previous job, but you cannot bring to WHA any confidential or protected materials produced by you, or anyone else, for your former employer.

**DID YOU KNOW?** *Federal and State laws require WHA to get approval from regulators for all advertisements.*

## GOVERNMENT RELATIONS

Health care is a highly regulated industry, and WHA embraces the additional legal and compliance responsibilities placed on us as a health plan. Our culture is one of honesty, integrity, and doing the right thing, the first time, every time.

## GOVERNMENT REQUESTS AND INQUIRIES

WHA must cooperate with government officials and must always provide accurate, complete, and timely information to all government entities if required by law. Types of government reporting include, but are not limited to, multiple types of government filings,

# OUR RESPONSIBILITIES TO WHA AND OUR STAKEHOLDERS

incident reports, amendments to licensure, EDGE submissions, audit submissions, RHPI's, Exchange certifications, claims, cost reports, correction action plans, and other reports, submissions, and filing. All request for information, subpoenas, and filings from the government must be forwarded to the Compliance and Ethics and/or Legal Departments unless prior approval has been provided.

If you discover or suspect that information that was provided to the government was in error, or there was an omission, you should immediately report this to your supervisor or manager and to the Compliance and Ethics and/or Legal Departments so that WHA can quickly correct the situation.

Nothing in our Code of Conduct prohibits you from reporting to or responding to an inquiry from a governmental authority about a suspected violation of law. If you do, immediately report this to the Legal Department.

## DOING BUSINESS WITH THE GOVERNMENT

WHA enters contracts to provide health care coverage to government employees and program beneficiaries. These contracts and laws must be complied with not only because it is required, but also because it is the right thing to do. The risks of non-compliance are very high. If you are unsure of what your responsibilities are related to government contracts, or have concerns about misconduct, please speak to your supervisor or reach out to the Compliance and Ethics and/or Legal Departments.

## GOVERNMENT EMPLOYEES

Recruiting and hiring former and/or current government employees are subject to changing rules that can vary based on the rank of the employee. WHA must exercise good judgment to ensure that no conflict-of-interest law is violated when considering employing or contracting with a government employee. The Human Resources Department should be consulted when considering employment or contracting with government employees and contractors.

## PROFESSIONAL LICENSURE REQUIREMENTS

If you are professionally licensed or certified, you are responsible for all requirements, keeping these credentials up to date, and ensuring you timely meet all continuing education requirements if required for your role.

# OUR RESPONSIBILITIES TO WHA AND OUR STAKEHOLDERS

## MEDIA RELATIONS

To avoid confusion and ensure clear, accurate, and consistent information is provided, only designated WHA representatives may communicate with the media or in a public relations capacity. Any media inquiries or requests should be referred to the Marketing Department.

## SOCIAL MEDIA

We are responsible with social media. We never post member or other information or photographs to a website, social media page, or public form—even if that information cannot be personally identified. When communicating in any public venue, Workforce Members must keep their own views separate from WHA’s views. Post responsibly, even if posting to personal sites. Remember, your posts are not anonymous and can negatively impact WHA’s reputation.

**Q. I am active on a social media site. If I have an opportunity to post information that would be good for our business, may I post it?**

**A.** You may not speak for WHA unless you have been given approval to do so. If you post information that related to your job responsibilities, you must disclose your affiliation with WHA and clearly state that your comments reflect your personal opinions and do not necessarily reflect the opinions of WHA. Never post WHA confidential information on a social media site or any other website.

**DID YOU KNOW?** *As of 2024, the average person spends approximately 2.5 hours on social media every day, which translates to a total of 5.5 years spent over a lifetime.*

## OUR COMMUNITY

As a non-profit and tax-exempt organization, WHA has a special responsibility to have a meaningful and lasting impact and to better our community.

## CHARITABLE CONTRIBUTIONS AND COMMUNITY SERVICE

WHA is committed to providing monetary, in-kind, and volunteer charitable contributions to multiple organizations in our community. WHA provides funding through donations and community grants. For more information, see the Community Relations Department.

# OUR RESPONSIBILITIES TO WHA AND OUR STAKEHOLDERS

## CONFLICTS OF INTEREST

Conflicts of interest can occur when you, your immediate family, a household member or other relationship, outside activity, or financial or private interest interferes or appears to interfere with, your ability to make objective decisions in your role at WHA. Workforce Members are expected to refrain from engaging in activities that might conflict with the business interests of WHA or their responsibilities or duties with WHA.

WHA maintains a robust conflict of interest policy that provides guidance on how to handle these kinds of situations. For more information, see leadership or the Compliance and Ethics, Legal, or Human Resources Departments.

**Q. I am a manager, and we are looking for a vendor to perform certain services. My brother-in-law has a successful company doing exactly what we are looking for. Does this post a conflict of interest?**

**A.** Potentially, yes. Because you likely will have a say in who is awarded the contract, having a family member as a candidate may influence your decision in the award process. In this case, report your Conflict of Interest to your supervisor or manager and the Compliance and Ethics Department, and remove yourself from the decision-making process so that there is no possibility of you having influence over the contract award.

**DID YOU KNOW?** *As of 2024, the average person spends approximately 2.5 hours on social media every day, which translates to a total of 5.5 years spent over a lifetime.*

## PRIVACY AND CONFIDENTIALITY

Protecting personal information is of the utmost importance to our business. We have an obligation to always comply with all applicable privacy and information security laws.

For guidance on that information should be guarded and how it should be guarded, review the applicable privacy and security policies. Never hesitate to ask your supervisor or manager, the Privacy Manager, other leadership, the Compliance and Ethics, Legal, and Information Security Departments if you have any concerns or suspect information has been mishandled.

We must ensure we understand specifically how we should handle information as part of our day-to-day responsibilities. When we must access confidential information as part of

# OUR RESPONSIBILITIES TO WHA AND OUR STAKEHOLDERS

our job duties, we always access or use only the minimum amount of information needed to do our job. This is called “minimum necessary”.

We have an obligation to report any concerns about compliance with privacy and information security. If your laptop or other items with confidential information are lost or stolen, you must report it immediately to your supervisor. If you believe protected health information (PHI) or personally identifiable information (PII) has been inadvertently disclosed, either internally or externally, please follow WHA processes to report the incident to your supervisor or manager and/or to Privacy via Jira Service Management. This also applies if you believe that an external party has inadvertently disclosed WHA PHI or PII.

Never use personal email, your phone (unless using a WHA-approved email app), or other non-work devices to conduct company business or send confidential or private information. Always safely store, access, and disclose confidential information in compliance with WHA policies and procedures, and the law.

**Q. Is it okay to discuss with another company the pricing and contract terms we have negotiated with one of our vendors, as they are looking to purchase the same services?**

**A.** No. Workforce Members should never communicate any information regarding price, cost, or terms and conditions with any other company, supplier, competitor, or potential competitor unless expressly approved by the Compliance and Ethics or Legal Departments.

**DID YOU KNOW?** *You could be implicated in a breach of competition law if you are present while competitors discuss costs and prices, even if you didn't participate in the conversation. If you find yourself in this situation, let them know that their conversation is inappropriate and leave the area right away.*

## GIFTS AND ENTERTAINMENT

Giving or receiving gifts and sharing entertainment may occur in connection with a legitimate business purpose. It is important that these exchanges be legal and appropriate. Gifts or other benefits must be of minimal value and should never be cash or cash equivalents (such as gift cards).

# OUR RESPONSIBILITIES TO WHA AND OUR STAKEHOLDERS

In some cases, items may need to be refused or returned. Items that are perishable such as food or flowers may be donated to a charity or shared in the workplace. It could be illegal to offer a gift, entertainment, meal, or travel expense to a government employee.

We must avoid the perception that we allow these items to influence our decisions. See the Compliance and Ethics or Legal Departments for guidance before giving or receiving these items.

**Q. A vendor whose contract I oversee presented me with a \$300 gift certificate and a plaque for my outstanding service. Can I keep it?**

**A.** Although you may keep the plaque, it would be inappropriate and against policy to accept the cash-equivalent gift. The high value of the item has the perception that the vendor is attempting to obtain favorable treatment from WHA or that. Your decisions may be influenced by this generosity. This matter should be reported to the Compliance and Ethics Department. The vendor needs to be reminded of our **Gifts and Entertainment** policy.

**DID YOU KNOW?** *The International Monetary Fund estimates that \$1.5 to \$2 trillion is offered in bribes every year! Those found guilty of bribery can receive prison sentences.*

## SUSTAINABILITY AND THE ENVIRONMENT

WHA is dedicated to environmental stability. A healthy environment has a direct impact on our individual and community health. We should reduce our environmental impact, when possible, by reducing waste, participating in recycling programs, conserving energy and water, using renewable sources, and supporting businesses that hold the same beliefs.

Dispose of surplus, obsolete, or inoperable property in accordance with applicable health and safety requirements. Items that may hold or store PHI or PII must be disposed of by Information Services so that the PHI/PII may be wiped or otherwise destroyed before disposing of the item.

# OUR RESPONSIBILITY TO CONDUCT BUSINESS ETHICALLY

## MARKETING, ADVERTISING, SALES, AND PROMOTIONS

Special trust is placed on those in the health care industry. We must continue to deserve that trust by conducting all marketing, pricing, and sales activities in an honest, fair, and straightforward manner that represents our integrity.

All WHA information is presented in an informative, educational, and non-deceptive manner. We are committed to truth in advertising. All advertising and other materials will be reviewed and approved by regulators and others, as appropriate, prior to distribution.

Additionally, we do not offer or give discounts, incentives, gifts, or other unallowable items of value for referrals, enrollment, or continued enrollment.

## POLITICAL ACTIVITIES AND CONTRIBUTIONS

WHA is a tax-exempt organization that is subject to strict rules under Internal Revenue Service and other regulations. Federal law prohibits WHA from making significant political campaign contributions, both directly and through Workforce Members or other persons. Additionally, reimbursing Workforce Members for participating in partisan political activity would jeopardize our tax-exempt status.

If you are employee of WHA and are personally involved in politics, you must be sure to express your political views as an individual and not as a representative of WHA. Your personal political activities or donations must occur on your own time and at your own expense, away from WHA property.

**Q. I went to a fundraising dinner for a pro-business candidate for a local government office. This candidate takes positions favorable to WHA's interests, so can I claim the dinner on my expense report?**

**A.** No. While you are free to attend political fundraising events as an individual, you must not use WHA assets or funds.

# OUR RESPONSIBILITY TO CONDUCT BUSINESS ETHICALLY

## RECORD RETENTION

The integrity of our books, records, and financial and other reporting information is a high priority. WHA maintains a record creation, retention, and destruction policy that complies with all applicable laws, regulations, and best practices.

Documents and records you handle must be created, retained, and deleted according to the processes defined in our policy. Special rules apply when the Legal Department asks you to hold on to certain records. Always err on the side of caution and do not delete or destroy information if you are unsure.

# SUMMARY

We hope you have found this Code of Conduct to be a helpful guide and will continue to view it as a valuable resource that helps you carry out your job responsibilities in accordance with the highest ethical standards. Remember, we rely on you to report violations, or potential violations, of the CoC, WHA policy, or law. Very rarely, requests for an exception to the CoC may be granted. Contact the Compliance and Ethics Department for assistance.

While the CoC cannot anticipate every situation that may arise in our business lives at WHA, applying its guiding principles and using good judgment can help you make the right decision in most cases. However, if you face a situation where the right course of action is unclear, ask yourself the following questions when you are unsure of what to do:

- \* Is it illegal?
- \* Does it follow WHA policy?
- \* Is it the right to do?
- \* Could it harm our reputation?

**Remember, if you ever in doubt, just ask! Contact your supervisor or manager or the Compliance and Ethics Department for additional guidance.**

## QUESTIONS? COMMENTS? CONTACT US:

For questions about this Code of Conduct or other WHA policies, contact Compliance and Ethics at [compliance@westernhealth.com](mailto:compliance@westernhealth.com)

**Wendy Soe-McKeeman**  
Chief Legal/Compliance Officer  
[w.soe-mckeeman@westernhealth.com](mailto:w.soe-mckeeman@westernhealth.com)  
916.563.3183

### YOUR TOOLBOX

#### RESOURCES

- \* Code of Conduct
- \* Policies, Standards, and Procedures
- \* WHA Intranet (iWHA)
- \* Employee Handbook

#### CONTACTS

- \* Your supervisor or manager
- \* Compliance and Ethics Department
- \* Legal Department
- \* Human Resources Department

#### ASK YOURSELF

- \* Do I have enough information to make a good decision?
- \* Is my action or inaction consistent with WHA's CoC, mission, values, policies, or the law?
- \* Is my decision honest and fair?
- \* Would my decision negatively affect WHA, my colleagues, or our stakeholders including members, providers, vendors, or the community?