



January 2022

Code of Business Conduct

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A message from our CEO

Thank you for reviewing LifeSecure's 2022 Code of Business Conduct and sharing our commitment to ethical and compliance-based business practices. Since LifeSecure's founding, these practices have helped us make a difference in the lives of our policyholders, develop innovative insurance solutions, and strengthen our reputation.

Our Code of Business Conduct is more than a set of rules. It sets our foundation of organizational integrity and promotes a culture of trust when we act ethically and responsibly. It also allows us to put our values into action and helps us make the right decisions every day.

Our individual and collective actions uphold and support our culture of organizational ethics which helps us serve our customers with integrity, respect our co-workers, seek guidance, and share concerns without fear. These principles will continue to support our success long into the future.

Sincerely,

Patrick J. Prichard
President and CEO
LifeSecure Insurance Company



A message from our Corporate Governance Director

LifeSecure strives to maintain high ethical and compliance standards. Our Code of Business Conduct demonstrates our commitment to these standards and serves as a valuable guide to ethical decision making. We are expected to adhere to the letter and spirit of this code. It is up to each of us to support and promote an ethical culture, to use sound judgment, and to do the right thing.

Please read the Code of Business Conduct carefully. If you have any questions concerning the Code, please speak to me or any of our senior leadership.

Thank you for making ethics and compliance a priority.

Sincerely,

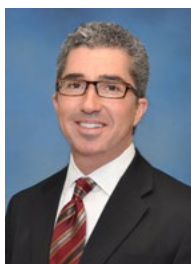
Peter Rill Director
Corporate Governance



Quick Reference Guide

The quick reference guide can be used to quickly find information that is frequently requested. Please note that the expectation is that everyone will read and agree to abide by the entire Code of Business Conduct document. Feel free to email corporategovernance@yourlifefsecure.com if you have any questions.

Compliance Leadership



Brian Vestergaard
LifeSecure Vice President,
Product & Marketing, Compliance Officer



Michele Samuels
BCBSM Senior Vice President, Corporate
Auditor, Enterprise Compliance Officer



Peter Rill
LifeSecure Director, Corporate Governance,
Privacy Official



Kelly Lange
BCBSM Vice President, Enterprise
Compliance, Privacy Official

Key Compliance Topics

- **Disclosing potential conflicts of interest (Page 10)**
 - Employees have a duty to disclose to their leadership, at the time it arises, any situation, transaction or relationship that may be viewed as a conflict of interest.
- **Gifts and Entertainment (Page 9)**
 - You should exercise good judgment in offering or accepting meals, entertainment or other gratuities to avoid any improper influence or the appearance of a conflict. For more information see the guidelines for acceptance and disclosure of gifts and entertainment.
- **The use of Company Email and Internet (Page 6)**
 - Following the guidelines for Company email and internet usage helps to protect the Company.
- **Safeguarding the confidentiality of personal and protected health information (Page 7)**
 - The Company is required by state and federal law, and is strongly committed to, safeguarding the confidentiality of personal and protected health information.
- **How we solve ethical problems (Page 11)**
 - We encourage you to think about ethical dilemmas, report problems or concerns, and ensure your behavior conforms to the standards in the Code.

Issues related to board members may be raised through the above channels or directly with the president.

Reporting Quick Reference

For guidance, issues, or concerns regarding:	Contact:
The Code of Business Conduct or General Compliance	Email: corporategovernance@yourlifefsecure.com Anonymous Hotline: 800-240-3050
Fraud, Waste, or Abuse	Email: corporategovernance@yourlifefsecure.com Anonymous Hotline: 800-240-3050
Privacy Concerns	Email: privacy@yourlifefsecure.com Anonymous Hotline: 800-240-3050

Workforce members should feel free to raise ethical concerns in good faith without fear of retaliation or intimidation.

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Standards of Business Conduct

Ethical Business Practices

[Click here](#)

1.0 Scope

For purposes of this policy, “Company” means LifeSecure Insurance Company. Any reference in this policy to “Company” is intended to be a reference to this entity.

By board resolution, this policy applies to the Company Board of Directors, members of the director-selection councils and board committees.

The term “workforce member” refers to individuals who perform duties or render services for or on behalf of the Company regardless of the type of employment or contractual agreement, including, but not limited to: full-time employees, part-time employees, temporary employees, contingent workers, volunteers, interns, contractors and consultants.

Vendors and independent contractors will be given a copy of the Company Code of Business Conduct. All are expected to comply with this policy.

1.1 High Ethical Standards: The Key to Our Success

Our Code of Business Conduct is part of the Company’s way of life. Ethics and compliance are related concepts, but not identical. Ethics are part of the culture of an organization. They provide a framework for decision making by guiding workforce members to always consider and do the “right thing.” This framework focuses on guiding workforce members on how and why to follow the rules.

Compliance is the requirement that workforce members abide by contractual obligations, LifeSecure standards, Company policies, and all applicable laws.

The Company requires those acting on its behalf to be respectful, fair, and courteous to each other and those affiliated with the Company. All employees are expected to conduct themselves in a respectful and businesslike manner in the workplace, during work-related activities, and in their dealings with co-workers, leadership and customers. The Company is committed to providing a safe working environment free of intimidation, retaliation, discrimination, threatening speech or behavior, threats of harm or violence, whether engaged in by another employee or third party, such as vendors or volunteers.

This Code requires those acting on behalf of the Company to act with honesty, integrity, and impartiality when dealing with customers, vendors, regulators, competitors, community, fellow workforce members, and board and council members. To earn and keep their trust, the Company makes every effort to avoid even the appearance of unethical or non-compliant conduct.

Leadership and the board of directors are committed to providing avenues through which ethical issues may be raised, reviewed, and resolved openly and honestly. Help is available when there are questions about how to maintain ethical standards. Anyone who is in a situation that raises an ethical concern should follow the guidelines in *How We Solve Ethical Problems* section of this policy.

1.2 Accounting and Reporting

To ensure the integrity of Company financial and other records, everyone is required to abide by established accounting and business practices which include accurately and truthfully recording accounting data, corporate information, and operating data. False or artificial entries are not allowed for any reason in Company financial records.

Examples of improper conduct include:

- Causing records to appear as though a transaction occurred when it did not
- Causing records to appear as though a transaction occurred at a different time or for a different amount than it truly did
- Failing to report suspected financial fraud, waste, or abuse
- Fraudulently influencing, coercing, manipulating, or misleading any accountant/auditor engaged in an audit of the financial statements of the Company

1.3 Antitrust Laws

The Company strives to conduct its business in a manner that helps maintain a free and competitive market. Activities that would restrain a competitive market, even artificially, are contrary to that philosophy and to antitrust laws, including:

- Entering into any agreement or joint conduct with competitors that would harm competition
- Collaborating with a competitor to decide what to charge for products or services
- Collaborating with a competitor to decide what to pay for services

To avoid any implication of an antitrust violation, Company workforce members should:

- Never discuss sensitive business information with a competitor
- Never exchange price information or communicate with a competitor about prices, anything that may affect prices, or customers
- Take extra care when attending trade association meetings or other events where interactions with competitors or customers may occur

Antitrust laws are very complex. Any questions about permissible or impermissible conduct should be directed to the Office of the General Counsel.

1.4 Fair Dealing

The Company is committed to dealing fairly with customers, vendors, competitors, and workforce members. We will not take unfair advantage of anyone through manipulation, concealment, abuse of privileged or confidential information, misrepresentation of facts, or any other unfair business practice.

1.5 Prior Criminal Convictions and Delegation of Authority

The Company has a legal duty to identify and consider for exclusion from its operations workforce members whose prior conduct was illegal or inconsistent with the administration of an effective compliance and ethics program. How that conduct is related to the specific responsibilities of the workforce member, as well as how recently the conduct occurred will be taken into consideration when making hiring, contracting, or retention decisions.

Workforce members will be subject to periodic background checks and to verification against government sanction lists. The Company will not do business with any individual or organization whose name appears on government sanction lists, as may be required by law, rule, or regulation. Disclosure requirements will be incorporated into applicable vendor and contractor agreements.

The Company's Human Resources department makes decisions regarding the hiring or retention of workforce members with histories of:

- Felony convictions
- Convictions for crimes of fraud, dishonesty, or other health care crimes
- Reported or discovered misconduct

Issues regarding contracting with any organizations that have felony convictions or other misconduct will be discussed and resolved by the Corporate Governance Director.

The Company will not delegate substantial discretionary authority to individuals whom it knows have a tendency to engage in inappropriate, improper, or illegal conduct.

1.6 Records Management

The Company requires compliance with Records Management policies that in accordance with applicable laws, establish uniform procedures for storing, retaining, and destroying corporate records. Exceptions to the policies may be made by the Office of the General Counsel during investigations of alleged wrongdoing or as required by law to preserve relevant corporate records.

1.7 Equal Employment Opportunity

LifeSecure Insurance Company's policy of equal employment opportunity is to recruit, hire, promote, reassign, compensate and train for all job classifications without regard to sex, race, color, national origin, religion, disability status, protected activity, age, veteran status, height, weight, genetic information, gender identity, sexual orientation, marital status, familial status, citizenship, membership in a historically under-represented group, pregnancy, childbirth or a related medical condition. All employment decisions and personnel actions, including those relating to compensation, benefits, transfers, layoffs, Company-sponsored training and tuition assistance programs, shall be administered in accordance with the principal of equal employment opportunity. Additionally, on the same basis, all employees are encouraged to use LifeSecure facilities and participate in programs sponsored by LifeSecure.

1.8 Prohibition of Harassment

The Company strictly prohibits any form of harassment or employment discrimination against an individual or a group based upon sex, race, color, national origin, religion, physical or mental disability, protected activity, age, veteran status, height, weight, genetic information, gender identity, sexual orientation, marital status, familial status, citizenship, arrest record, membership in a historically under-represented group, pregnancy, childbirth or a related medical condition.

The term "harassment" includes, but is not limited to, bullying, offensive language, jokes, or other verbal, graphic, or physical conduct which would make a reasonable person experiencing such harassment or discrimination uncomfortable in the work environment, or which could interfere with the person's job.

1.9 Inclusion and Diversity in the Workplace

LifeSecure is committed to fostering, cultivating, and preserving a culture of inclusion, diversity, and equity. Creating awareness of different cultures, communities, generations, and work styles enhances our work environment and expands our awareness, where everyone, regardless of race, ethnicity, religion, age, seen or unseen disability, sexual orientation, gender identity, or veteran status, etc. can contribute at their highest levels. The focus on diversity and inclusion extends to vendors, community partners, and stakeholders.

Workforce members are expected to act in an inclusive, collaborative, and respectful manner at all times. Workforce members are encouraged to come together to learn, engage and serve as allies.

Please refer to the corporate Equal Employment Opportunity or the Anti-Harassment and Discrimination policy to learn more about Company guidelines related to inclusion and diversity.

1.10 Government Investigations

If you are contacted at work or outside of work by a governmental agency concerning a work-related matter, you must immediately contact your leadership and the Corporate Governance department.

LifeSecure and the Office of the General Counsel can aid in determining how to respond to the request for information. If you receive a subpoena from a government agency, you must immediately contact the Corporate Governance department at corporategovernance@yourlifesecond.com.



1.11 Workforce Members Serving as Corporate Representatives on External Boards

Business organizations: LifeSecure President and Chief Executive Officer approval is needed for specific workforce members to serve as a corporate representative on the board of a business organization. Corporate representatives must submit an expense report to obtain reimbursement for expenses incurred to attend meetings. Any expense reimbursement received from the business organization should be made payable to the Company and include documentation. Corporate representatives may not accept retainers, meeting fees, stipends, or any other compensation offered for service at these business organizations.

Charitable, civic and community organizations: LifeSecure President and Chief Executive Officer approval is needed for any executive staff member to serve as a corporate representative on the board of a charitable, civic or community organization. Leadership approval is needed for any other workforce member to serve as a corporate representative on these boards. Corporate representatives may not accept retainers, meeting fees, stipends, or any other compensation when offered for service on these boards.

Anyone sitting on external boards in their individual capacity and not as representatives of LifeSecure should see the *Conflicts of Interest – Outside Work* section for more information. The Corporate Governance department solicits external board participation disclosures from executives at least annually, and disclosures must be updated throughout the year, as necessary.

1.12 Participation in Conferences or Meetings

You may not solicit customers, vendors, consultants, or agents to pay for the costs of travel, lodging, registration fees or other personal expenses related to conference or meeting attendance.

Cash honorariums or any other financial consideration received related to your position with the Company may not be accepted. Should any such payment be received, you must process it per the guidelines in the Business Expense Reimbursement policy.

In most situations payment for travel-related expenses will be reimbursed by the Company in accordance with applicable Business Expense Reimbursement policy.

Attendance at or participation in conferences or meetings unrelated to current or potential Company business are not subject to this code.

If a current or potential customer, vendor, consultant or agent offers to pay for travel, lodging or registration fees associated with a meeting or conference the following requirements must be met:

- Vice President or above approval must be obtained prior to attending the conference or meeting
- The expenses paid by the vendor must be reasonable and consistent with the Business Expense Reimbursement policy, e.g., do not involve lavish accommodations or expenditures
- Your attendance must be for a valid business purpose and a reasonable adjunct to a business relationship
- The expenses for attendance are reasonable considering the benefits afforded to the Company and unlikely to compromise your ability to carry out your duties
- You must make a reasonable effort to determine the value of the travel expenses associated with the conference(s) or meeting(s) and disclose the amount on your conflict of interest disclosure form as they arise

Note: Workforce members with responsibility for administration of Company workforce member benefit plans such as 401k plans, life insurance or workforce member health plans are subject to additional legal requirements. These workforce members (including their relatives) may not accept any gifts, gratuities or other considerations from a customer, vendor, consultant or agent about any transaction involving Company assets having an annual aggregate value of \$250 or more. Workforce members with these responsibilities may attend educational conferences related to workforce member benefit plans but shall be subject to the same guidelines as listed above.

Protecting Corporate Assets

2.1 Use of Company Assets and Funds

Company assets are to be used for reasonable and bona fide business purposes. Company assets include, but are not limited to:

- equipment
- funds
- office supplies
- concepts
- business strategies and plans
- financial data
- other information about Company business

These assets may not be used to derive personal gain for you or for others. You must not transmit Company information to personal emails or unauthorized external parties. Workforce members shall refer to the Acceptable Use Standard for requirements and guidelines on appropriate use of assets.

The Company should not directly or indirectly extend or maintain credit, arrange for the extension of credit, or renew an extension of credit in the form of a personal loan to or for any Director or Executive Officer (or equivalent thereof) of the Company.

2.2 Use of Company E-mail and Internet

The Company's internal e-mail systems are acceptable for transmitting confidential data within the enterprise. Protected health information may be shared using internal e-mail systems provided the recipient has a business need-to-know and the minimum necessary rule is applied. Our internal electronic mail systems, however, are not secured sources of data transmission and should not be used to send e-mail over the public network unless appropriately encrypted.

Encryption is required when sending sensitive data outside the Company. Messages traveling through the internet are subject to potential public disclosure through innocent misdirection or deliberate intervention if not encrypted.

When sending sensitive data outside the Company, you must comply with applicable corporate policies, including the Health Information Privacy policy, Information Security policy and related Corporate Standards. An encryption option is available to secure messages that are being sent over the Internet. You should avoid sending PHI, PII or corporate sensitive information by email outside of the Company whenever possible. Contact your leader or the Security Official with questions related to encrypted e-mail.

It is a violation of the Code of Business Conduct to create, access or exchange messages or information on or through the Company's electronic mail systems or computer networks that is offensive, harassing, obscene, threatening or disparaging to others. Simply stated, do not send anything via the electronic mail systems that you would not want disclosed publicly. In addition, do not access such information using business computer systems.

It is a violation of the Code of Business Conduct to use the Company's internal e-mail systems to create or share information that is offensive, harassing, obscene, threatening, or disparaging to others.

2.3 Adherence to Fraud, Waste and Abuse Guidelines

The Company is committed to preventing and detecting fraud, waste, and abuse. The Company promotes an ethical culture of compliance with all federal and state regulatory requirements and requires the reporting of any suspected fraud, waste, or abuse. The Detection and Prevention of Fraud, Waste, and Abuse policy is available on the corporate intranet and sets forth the requirements.

2.4 Confidentiality

The Company is required by state and federal law, and is strongly committed to, safeguarding the confidentiality of personal and protected health information. Such information includes, but is not limited to, a policyholder's medical history, treatment records, age or marital status. You may have access to this information only if you need it to perform your job. You may use and disclose it only as permitted or required by law and by our corporate Health Information Privacy policy and/or consistent with the Intellectual Property policy. Any breach of this obligation to maintain the confidentiality of protected health information will be viewed very seriously and will result in discipline, up to and including termination of employment.

You must vigorously safeguard the Company's confidential or proprietary information. Confidential or proprietary information includes any information that is not generally disclosed outside the Company and that may be useful or helpful to our competitors. Examples include financial data, source code, customer lists, business strategies, and information or data that we have agreed by contract to maintain confidentially. To protect this confidential information from improper disclosure, follow these guidelines:

- Share confidential information with others within the enterprise only on a need-to-know basis
- Do not transmit corporate information to personal emails or unauthorized external parties
- Do not use a workforce member-owned device to capture or disseminate images or audio of any corporate data
- Ensure that disclosure of any confidential information to outsiders is approved by leadership and protected by an appropriate confidentiality agreement
- Avoid incidental disclosures of confidential information in conversations with customers and others

All employees, regardless of work location, must follow Company confidentiality guidelines. Additional information can be found on the corporate intranet site.

You must also respect and protect the trade secrets, proprietary and confidential information of other entities acquired prior to working for the Company. Confidential or protected information includes, but is not limited to the following:

- Customer lists
- Patented products, methods, or processes
- Copyrighted materials
- The trade or service marks of others

Questions regarding ownership issues and the use of confidential or protected information should be directed to Corporate Governance at corporategovernance@yourlifecure.com.

2.5 Political Activities

The Company encourages you to be a good citizen and to participate in the political process. However, if you participate in political activities on your own initiative, including making personal political contributions to candidates or political parties, make it clear that you are acting as an individual and not acting on behalf of the Company. You may not use any Company property, facilities, or time of any other workforce member for any political activity. Involvement in political activities should be conducted outside of working hours.

Corporate political activity is highly restricted. The Company is prohibited by law from using its funds to support candidates for federal, state or local office. A narrow exception to this rule allows use of Company resources to form and maintain bluesPAC, a political action committee that may then make political contributions using voluntary donations from eligible workforce members.

Conflicts of Interest

Employees are to disclose any relationships, outside business dealings, and any other interests or activities that may conflict with the interests of the Company. Disclosures must be made any time a potential or actual conflict occurs throughout the year.

3.1 Identifying Potential Conflicts of Interest

You have a duty to be entirely free from influence of any conflicting interests when representing the Company in business dealings or making recommendations that may influence an action of the Company.

The Company respects your privacy in personal activities and financial affairs. This code is intended to help you avoid situations that may represent a conflict of interest (COI).

The Company cannot foresee or define every situation that might be considered a conflict of interest. A conflict exists when an obligation or a situation resulting from your personal activities or financial affairs, or those of a close relative or cohabitant may influence his or her judgment in performing his or her duty to the Company. In some cases, an apparent conflict of interest is more theoretical than real, but it is important to disclose and resolve such cases promptly.

If you are not certain whether to report a potential conflict, contact Corporate Governance at corporategovernance@yourlifesecond.com for guidance.

Conditions in which potential conflicts of interest may arise include, but are not limited to:

3.1.1 Financial Interests – A conflict may exist when a workforce member, directly or indirectly, or one of his or her relatives or cohabitant owns any beneficial interest in an organization which is a competitor of the Company or which has current or prospective business with the Company as a vendor, customer or contractor. A conflict is not likely to exist, however, where the financial interest consists of stock holdings of under five percent in a publicly traded company.

3.1.2 Outside Work – A conflict may exist when a workforce member or one of his or her relatives or cohabitant serves in any capacity with an organization, including board participation, which is a competitor of the Company or which has current or prospective business with the Company as a customer, vendor or contractor.

A conflict may exist when a workforce member engages in an independent business venture or performs work or services for another business, community, civic, or charitable organization to the extent that the activity prevents the workforce member from devoting the time and effort to the Company's business or impairs the workforce member's ability to act in the best interests of the Company.

3.1.3 Trading with the Company – A conflict may exist when a workforce member, or one of his or her relatives or cohabitant is involved in a transaction with the Company, involving rental or purchase of real estate or other property, equipment or supplies or the provision or receipt of other goods or services. An example of this type of conflict would be an employee, or their relative or cohabitant, owns a computer refurbishing company and the employee, or relative or cohabitant, purchases LifeSecure surplus computer equipment through the refurbishing company.

3.1.4 Confidential Information – A conflict may exist when a workforce member or one of his or her relatives or cohabitant uses any confidential information obtained as a result of his or her employment for personal gain or for the benefit of others. An example of this type of conflict would be an employee, or their relative or cohabitant, uses the product pricing information obtained through work performed for LifeSecure to gain a competitive edge on the advisory services they provide to others in the healthcare market outside of work.

3.1.5 Business Opportunities – A conflict may exist when a workforce member, without knowledge and consent of the Company, assumes the benefit of any business venture, opportunity or potential opportunity from the course of his or her employment, and which is related to any current or prospective business of the Company.

3.1.6 Relatives or Cohabitants – A conflict may exist if a relative or cohabitant works for the enterprise, vendor, customer or competitor, depending on the reporting relationship or job functions performed. Likewise, a conflict of interest may exist when a workforce member processes claims payments for relatives or cohabitants who are subscribers or members of the Company.

3.1.7 Gifts and Entertainment – A conflict may arise when a workforce member, or one of his or her relatives or cohabitant:

- Accepts a gift or entertainment from a person or organization that is a competitor, or that has current or prospective business with the Company as a customer, vendor, agent or contractor.
- Where the acceptance, or the prospect of future gifts or entertainment, may limit the workforce member from acting solely in the best interests of the Company.

A “gift” or “entertainment” includes any gratuitous service, loan, discount, money, article of value or favor, but does not include loans from financial institutions on customary terms, articles of nominal value ordinarily used for sales promotion, ordinary business lunches, or reasonable entertainment consistent with local social and business custom, which may be part of your job duties and responsibilities.

The temporary receipt by a workforce member of a donation to a corporate sponsored charitable event shall not constitute the acceptance/receipt of a gift. Workforce members may not receive cash even if it is intended for a corporate sponsored charitable event but should encourage cash donations to be made directly to the charitable organization. For purposes of this section, corporate sponsored event is an event where the Company is an official sponsor, one where a Company executive serves on the board as part of his/her corporate responsibilities, or an event that has been approved by management.

3.1.8 Other – Any other situation where a conflict may exist regardless of whether identified above.

[Click here](#)

3.2 Disclosing Potential Conflicts of Interest

In addition to the annual formal statement, employees have a duty to disclose to their leadership, at the time it arises, any situation, transaction or relationship that may be viewed as a conflict of interest, by amending their conflicts of interest disclosure statement. Employees can make changes to a disclosure by accessing their last conflicts of interest statement on the compliance training website. A link to the conflict of interest form is available on the corporate intranet site iZelly or email corporategovernance@yourlifefsecure.com for assistance.

Employees who work together may naturally form friendships or relationships either in or out of their workplace. Any relationship that interferes with the harmonious work environment, teamwork, productivity or creates a hostile work environment is prohibited.

3.3 Guidelines for Acceptance and Disclosure of Gifts and Entertainment

The following are guidelines for acceptance and disclosure of gifts:

- You may not accept any gift or entertainment that would influence your business judgment in favor of a customer, vendor, consultant, agent or competitor.
- You are required to disclose receipt of any gifts or entertainment exceeding \$100 in value for a single gift. You are encouraged to obtain leadership approval prior to accepting gifts or entertainment exceeding \$100 in value. Examples of gifts that are typically acceptable to receive include but are not limited to: a fruit basket, a raffle prize, or an umbrella.
- You may not give or receive monetary gifts or cash equivalents. Articles of nominal value ordinarily used for sales promotion may be exchanged. Also, the exchange of business courtesies, including reasonable meals and entertainment consistent with social and business custom is permissible. You should exercise good judgment in offering or accepting meals, entertainment or other gratuities to avoid any improper influence or the appearance of a conflict.

- When dealing with other individuals and entities whose standards are more restrictive than ours, we will follow their standards to the extent we are aware of them. Federal law prohibits gifts to federal workforce members, certain union leaders and to members of Congress, including any vendor, consultant, agent or government official affiliated with government health programs. We must follow the law as it applies to gifts to these individuals. No inducements may be offered to or accepted from state or federal government workforce members. No marketing gifts may be given to prospective government health program members valued at more than \$15.
- When in doubt as to whether gifts and entertainment are appropriate, consult your leadership or contact the Corporate Governance Director.

[Click here](#)

3.4 Anti-bribery and Anti-corruption

You should act with the highest ethical standards and are prohibited from engaging in criminal acts including any bribery and/or corruption. Corruption and Bribery are both state and federal crimes; engaging in unlawful acts creates risk for both the Company as well as you as an individual.

Corruption broadly means giving a benefit or advantage to someone contrary to the rights of others. Bribery, which is a type of corruption, is the offering, giving, receiving, or soliciting of any item of value to influence the actions of an official, or other person, in charge of a public or legal duty. Both bribery of government officials as well as private sector bribery is unlawful and prohibited. Participation in activity in violation of this statement will be subject to disciplinary action up to and including termination.

How We Solve Ethical Problems

Some ethical issues have clear solutions. Other ethical questions are not as clear present difficult choices.

The Code of Business Conduct cannot list every potential dilemma; however, it can provide guidelines. If you are faced with an ethical problem:

We encourage you to think about ethical dilemmas, report problems or concerns, and ensure your behavior conforms to the standards in the Code.

Because you are encouraged to act as a good corporate citizen and raise issues about questionable activities, negative actions will not be taken against you for making a complaint or disclosing information about an activity that you believe in good faith may violate this Code or any laws, even if your belief is mistaken. Anyone who attempts to retaliate against you for reporting problems or concerns will be disciplined. The expectation is that you will feel free to demonstrate good faith reporting of compliance concerns without fear of retaliation or intimidation.

Any known or suspected violation of this Code or any laws need to be reported. You are obligated to immediately report instances of potential misconduct or non-compliance. Participation in internal and external investigations is required. Failure to report or cooperate in an investigation will subject you to discipline, including possible termination of employment.

How We Respond to Inquiries and Reports Involving the Code of Business Conduct and Compliance Issues

The Company is committed to creating a work environment that encourages and accepts inquiries and reports involving the Code of Business Conduct, suspected compliance issues, suspected violations of federal or state law, or suspected fraud, waste, or abuse. Anyone may report a compliance concern and reports may be made confidentially or anonymously.

We will review and investigate reports of potential violations as appropriate. If criminal conduct is confirmed, our response may include actions to mitigate any harm caused. Mitigating actions could include making appropriate restitutions and assessing the Company's compliance program to ensure the program is effective and consistent with applicable regulations.

If you are involved in a reported potential violation, you will be treated fairly and given an opportunity to explain your actions.

Remember that when you make an inquiry or report, it will be handled as confidentially and discreetly as possible. We may, however, be required to substantiate any allegations of wrongdoing. A written record of your inquiry and our response will be made and forwarded to Human Resources or the Corporate and Financial Investigations department (if related to fraud) for review and follow-up as required.

Disciplinary Action for Violations

Appropriate disciplinary actions may be taken against any workforce member who:

- Violates the law
- Violates the Code of Business Conduct or Corporate Ethics and Compliance policy
- Fails to report a violation of law, Code, or policy
- Fails to cooperate in internal or external investigations of alleged violations
- Fails to participate in required compliance training

Workforce members who fail to take reasonable steps to identify, prevent, discontinue and report misconduct as soon as it is suspected or discovered will be subject to discipline.

These behaviors are examples of situations that can lead to discipline and do not constitute an all-inclusive list of infractions. Each situation will be evaluated individually.

Appropriate disciplinary action may include termination and referral for criminal prosecution.



Definitions

Company – LifeSecure Insurance Company (“LifeSecure”).

Cohabitation – Two persons living together as if married.

Fraud, Waste and Abuse:

- **Fraud** – Intentional deception or misrepresentation made by a person or entity, including but not limited to workforce members, contractors, affiliated vendors, authorized agents, enrollees, members or other third persons with the knowledge that the deception could result in some unauthorized benefit to himself/herself or some other person or entity. It includes any act that constitutes fraud under applicable Federal or State law.
- **Waste** – Activities involving the Company’s payment or reimbursement, or attempts to receive payment or reimbursement, for items or services where there was no intent to deceive or misrepresent, but rather a state or federal program incurred unnecessary costs because of poor, inaccurate, or inefficient invoicing, billing, or processes.
- **Abuse** – Behavior with respect to a state or federal government plan that is deficient or improper when compared with behavior that a prudent person would consider reasonable and necessary business practice given the facts and circumstances. Abuse also includes misuse of authority or position for personal financial interests or those of an immediate or close family member or business associate. Abuse does not necessarily involve fraud, violation of laws, regulations, or provisions of a contract or grant agreement.

Government Programs – Includes Medicare, Federal Workforce Member Plan and Federal Workforce Member Health Benefit programs.

HIPAA – The Health Insurance Portability and Accountability Act of 1996 and its implementing regulations.

Minimum Necessary Rule – A key component of the HIPAA Privacy Rule requiring that the Company and its workforce members take reasonable precautions to only collect, use, and disclose the minimum amount of PHI needed to carry out a permissible business purpose or function.

Personally Identifiable Information (PII) – Any information that alone, or in combination with other information, identifies, or could reasonably identify, an individual and/or his or her relatives, employers, or household members. Not all PII is PHI. Information that is not obtained for medical purposes or as a result of health care operations is generally not PHI.

Protected Health Information (PHI) – Is individually identifiable health information, including demographic information collected from an individual, that is transmitted or maintained in electronic or any other form or medium, and is created, or received by a health care provider, health plan, or health care clearing house; and relates to past, present, or future physical or mental health conditions of an individual; the provision of health care to the individual; or past, present, or future payment for health care to an individual, and that identifies the individual; or with respect to which there is a reasonable basis to believe the information can be used to identify the individual.

Public Network – A network that can be freely accessed by anyone, e.g., the Internet.

Relative – Family members, such as a spouse, parent, child, sibling, including step- relative and in-law. Family members also include domestic partners and any person who is part of your household.

Workforce Members – Individuals who perform duties or render services for or on behalf of the Company regardless of the type of employment or contractual agreement, including but not limited to full-time employees, part-time employees, temporary employees, contingent workers, volunteers, interns, contractors and consultants.

