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Code of Conduct



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GETTING STARTED:

Why do we have a Code of Conduct?

Our Code of Conduct is the roadmap and compass for conducting our operations ethically and in accordance with the law. It sets forth the standards that guide our actions and describes the values and ethical behavior expected by CareOregon. The Code of Conduct also contains useful guidance for daily business conduct, which is intended to assist us in our work for CareOregon. While no guidelines can cover every issue that may arise, it is our responsibility to always exercise ethical conduct. There is no substitute for personal integrity and good judgement in helping us do so.

Who must follow our Code of Conduct?

Our Code of Conduct applies to all CareOregon Employees, members of the Board of Directors, volunteers, vendors, and employees of subcontractors and downstream entities who are performing work for CareOregon. It applies to CareOregon and all of its subsidiaries and affiliated entities, including Health Share of Oregon and Housecall Providers.

What are our responsibilities?

As CareOregon, we commit to follow the guidelines set forth in this Code of Conduct. Our responsibilities include:

- Reading and being familiar with the information in our Code of Conduct.
- Certifying annually that we understand and will follow our Code.
- Acting in a manner that is consistent with our core values and ethical standards.
- Raising questions and concerns if we become aware of violations of laws or our Code; and
- Cooperating when responding to an investigation or audit.

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We provide coverage to individuals enrolled in Medicaid and Medicare in Oregon. As a result, we must comply with applicable laws and regulations set forth by the State of Oregon and the Federal government. If a situation arises where our Code of Conduct, policies, or practices conflict with laws or regulation, you must contact the Compliance Team for guidance.

Additional expectations for management:

We rely on our management to promote an environment that supports our core values and compliance with the Code of Conduct. To help us maintain this environment, we expect management to:

- Serve as a positive role model for ethical behavior and decision-making.
- Help those they supervise understand our Code and behavior expected of them; and
- Create an open environment where employees are comfortable raising questions and concerns.

Managers are expected to report any known or suspected misconduct they are made aware of and not retaliate or ignore acts of retaliation against others.

What is expected of our business partners?

We expect our business partners (vendors, subcontractors, downstream entities, and other third parties) to act in a manner consistent with our core values and our Code of Conduct.

What are the consequences for violating our Code of Conduct?

We are expected to always comply with our Code of Conduct. This Code of Conduct will be enforced, and any violation may result in disciplinary action, up to and including termination. However, consideration may be given to those who self-report. We will not tolerate retaliation of any kind against any employee who, in good faith, makes a report or cooperates in an investigation.

How do we handle ethical dilemmas?

Ethical questions are not always clear cut. They present us with difficult choices. When faced with a difficult situation, think through the issue and reference available resources.

Acting with fairness, integrity, honesty, and trustworthiness requires us to make ethical decisions. While the guidelines set out in this Code help us address specific situations.

In any ethical dilemma, ask these questions:

- Is the proposed action legal?
- Is it consistent with our core values?
- Does it comply with our Code and policies?
- Would you think it was okay if you read about it in the news?

If the answer to any of these questions is no, do not do it!

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If you are still unsure about the best course of action in a particular situation, seek advice from the Compliance Team before proceeding by reaching out to any of the contacts listed in this Code of Conduct.

How should we seek guidance and report violations or concerns?

One of our most important responsibilities as part of CareOregon is to speak up if we suspect misconduct. If we know of or suspect a violation of laws, rules, regulations or this Code of Conduct we must report our concern. We have an obligation to do so.

We can ask questions or report suspected misconduct in several ways:

Discuss the question or concern with your immediate supervisor or the next level of management. This may be the most direct way to seek guidance. You can also contact Human Resources for questions about employment, benefits, employee relations and workplace issues, or Audit and Compliance for matters related to compliance and auditing.

Contact the Compliance Team for ethics questions or concerns, including violations of laws, rules, regulations, the Code of Conduct, or CareOregon's Ethics Policies. Use the EthicsPoint Hotline for reporting concerns or violations confidentially, including accounting, internal controls, and auditing matters. If you contact the EthicsPoint Hotline, you may choose to report your concerns anonymously.

COMPLIANCE & ETHICS CONTACTS

- Compliance Team complianceteam@careoregon.org
- Vice President of Audit & Compliance, Chris Zorn at zornc@careoregon.org
- EthicsPoint www.ethicspoint.com or 1-888-331-6524

What happens when a violation is reported?

CareOregon investigates reports of suspected violations confidentially, to the extent possible. You should not conduct your own investigation as doing so may compromise an investigation and could adversely affect CareOregon.

What if there is a concern of retaliation?

CareOregon policy prohibits retaliation and intimidation against someone for raising a concern about compliance. Any employee who, in good faith, seeks advice, raises a concern, reports misconduct, or cooperates in an investigation is following CareOregon policy and doing the right thing. If you feel that retaliation or intimidation has occurred, contact the Vice President of Audit and Compliance immediately. Any person who retaliates against someone for raising a compliance issue is subject to disciplinary action, up to and including termination. CareOregon gives you the opportunity to have your questions and concerns fairly considered. However, it is a violation of our Code of Conduct to knowingly submit a report or complaint with a false accusation.

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OUR GUIDELINES

The Guidelines in this Code of Conduct are organized under five main categories – Responsibility for Our Workplace Environment, Responsibility for Ethical Business Practices, Responsible Use of Corporate Assets, Responsibility to Our Members and Patients, and Responsibility to Ourselves – which are intended to help us make decisions that reflect our core values and commitment to the highest standards of business ethics.

Because our employees, members, and patients all rely on us to maintain an excellent reputation, the guidelines in this Code of Conduct go beyond the minimum requirements of the law.

RESPONSIBILITY FOR OUR WORKPLACE ENVIRONMENT

We are a diverse company doing business with a diverse population. As such, we value the different backgrounds and experiences brought to CareOregon. We foster an inclusive environment where we encourage, and promote forums for, employees to engage in dialogue with one another. We continuously seek to better understand each other, and we treat each other with respect and dignity, in a manner consistent with CareOregon's principles and values.

We recognize and avoid behaviors that others may find offensive. Harassment of others, whether verbal, physical, or sexual, is prohibited in the workplace. CareOregon does not tolerate conduct that involves harassment of an employee. Any employee who creates a hostile work environment is subject to disciplinary action up to and including immediate dismissal. If you witness harassment in the workplace, contact the Compliance Team immediately through one of the methods listed above.

CareOregon promotes a Safe, Secure, and Healthy Workplace

We are committed to providing a safe, secure, and healthy environment to our employees. Activity that compromises the safety, security, or health of our employees must be reported. Acts or threats of violence compromise this commitment and will not be tolerated. Each of us plays an important role in preventing and identifying threats and situations where violence may occur. We must report any such event immediately.

We Support Human Rights

We are committed to treating each other with respect and dignity and in accordance with fair labor principles. We condemn discrimination based on race, color, sex, gender, gender identity, sexual orientation, religion, disability, national origin, veteran status, marital status, age or any other status or category that is protected by applicable state, local or federal law.

CareOregon policy prohibits retaliation and intimidation against someone for raising a compliance issue and for good faith participation in the compliance program. If retaliation or intimidation occurs, immediately inform the Vice President of Audit & Compliance. Any person who retaliates against

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someone for raising a compliance issue is subject to disciplinary action. In addition, any employee who deliberately makes a false accusation with the purpose of harming or retaliating against another coworker is subject to disciplinary action.

RESPONSIBILITY FOR ETHICAL BUSINESS PRACTICES

We Comply with the Law

We comply with all applicable laws and regulations in our business. CareOregon is a nonprofit that works to elevate the wellbeing of all Oregonians, especially those living in poverty, by providing first-class healthcare and supporting efforts to improve the social conditions that affect wellness. As part of this work, CareOregon operates two of Oregon's coordinated care organizations: Jackson Care Connect, Columbia Pacific CCO, and partners in the operation of Health Share of Oregon. This means that CareOregon must follow the laws and regulations that govern the Oregon Health Plan (Medicaid). Additionally, CareOregon operates CareOregon Advantage (Medicare) and must also follow regulatory guidelines from the Centers for Medicare and Medicaid Services (CMS).

You need to be aware of the rules and regulations that impact your work. These include federal and state guidelines, such as:

- **The Health Insurance Portability and Accountability Act (HIPAA)** – requirements for how personally identifiable data should be protected from fraud and theft, including how and when protected health information (PHI) can be disclosed without a member, patient, or their authorized representative's consent.
- **Anti-Kickback Statute (AKS)** – prohibits providing or soliciting money or gifts (kickbacks) in exchange for referrals of services covered by any federal healthcare program. Violation of this law is a felony.
- **The False Claims Act (FCA)** – also called the "Lincoln Law" imposes liability on federal contractors who defraud government programs (like Medicare) by improperly receiving payment from (or withholding payment to) the Federal government. Oregon's False Claims Act is similar to the federal FCA and prohibits the submission of false or fraudulent claims to any public agency, including Oregon Medicaid.
- **Stark Law** – prohibits the referral of a Medicare or Medicaid patient to an entity (provider, laboratory, hospital) with whom the physician or an immediate family member has a financial relationship.

Additional rules and regulations may apply to the work that you do. You should familiarize yourself with your department's policies and procedures, and check with your supervisor or manager about any other requirements you need to follow. If you are unsure, reach out to Compliance for guidance.

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We Prevent Fraud, Waste, and Abuse

CareOregon is committed to preventing, detecting, and correcting fraud, waste, and abuse (FWA) related to health care benefits. We are responsible for reporting any suspected health care fraud or concerns of non-compliance to any of the following resources: your supervisor, a manager or director of the company, or the Internal Audit & Compliance Department. If you report an issue to your supervisor or manager, they are required to report it to Audit & Compliance.

Annually, we complete Fraud, Waste, and Abuse training. This is required by law, but also serves to ensure that we are familiar with what these terms mean and how they impact our ability to provide healthcare to our members. CareOregon collaborates with all government agencies, including the Medicare Drug Integrity Contractor (MEDIC) to perform specific program integrity functions for the Medicare Part D Program. We maintain a comprehensive plan to detect and prevent fraud, waste, and abuse. If we have information on potential violations of Federal and/or State criminal, civil, and administrative laws, rules, and regulations we refer this information to the VP of Audit & Compliance, who will refer, as appropriate, to the MEDIC or other agency for further investigation.

We Do Not Engage in Corruption or Bribery

Never make or receive payments for the purpose of influencing anyone to do something wrong. Payments made by us, or on our behalf, must be made for lawful and legitimate business purposes. We prohibit bribery and must never pay, offer, accept, or request anything of value to secure an improper advantage.

We use Good Judgement when Exchanging Business Courtesies

CareOregon's policy is simple. We do not exchange gifts that look like an attempt to influence a business decision. No matter if you are the giver or the recipient, you need to recognize when an offer is excessive under our policy. Just say "no." Decline gifts of any value from current or potential vendors, customers, or other business partners if it would create an actual or potential conflict of interest. And never request gifts, meals, entertainment or favors from these third parties – doing so is a violation of our Code of Conduct.

Employees and vendors must take particular care when they are offered gifts, meals, entertainment, or any gratuities from potential business partners during negotiation of a transaction. Decisions involving vendors, business associates, First Tier, Downstream or Related Entities (FDR), and participating providers must be based only on the value of their goods or services for CareOregon and our members.

Q: Jim is in charge of choosing a new vendor to print our member ID cards. One of the vendors he is considering offers him free tickets to a Portland Pickles game. Can Jim accept the tickets?

A: No. Jim cannot accept these tickets because they could be an attempt to influence Jim's decision. There are Federal and State regulations that prohibit CareOregon employees from

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accepting gifts like this. When in doubt, just say “No!”

Federal and State anti-kickback laws prohibit CareOregon Employees, members of the Board of Directors, and subcontractors from knowingly and willfully offering, paying, asking, or receiving any cash or other payment (such as a discount or an item of value), in return for referrals, arrangements, or orders for any good or service that could be reimbursed by public health care programs. This is a complicated area that includes many exceptions, contact the VP of Audit & Compliance if you have questions about whether this law may apply to a particular activity. Violations of the law carry serious penalties, including imprisonment.

We Ethically Handle Conflicts of Interest

Actual or potential conflicts of interest should be disclosed as soon as possible so that appropriate arrangements may be made to clearly mitigate the conflict of interest to not violate this Code of Conduct. Disclosure may be made to the Compliance Team, Human Resources, Legal Affairs, or the Procurement Department as applicable.

Q: Pam has a cousin who is looking for a job. Pam has an opening on her team, so she tells her cousin to apply for the job and she'll hire them. Did Pam do the right thing?

A: No! Pam has a conflict of interest in this situation. Her personal relationship is influencing her decisions on behalf of CareOregon.

We are all expected to act in the best interest of CareOregon. This means we must never allow our personal interests to influence our actions on behalf of CareOregon. Every decision we make while on the job must be objective and with CareOregon's business interests in mind. We value the relationships we have built with our members, providers, and other business partners. It is important that these relationships remain positive and ethical.

We Avoid Unethical Business Opportunities

We avoid taking business opportunities that arise using corporate property, information, or position; and we refrain from using CareOregon property, information, or position for personal gain or to compete with CareOregon. We will not ask for or accept an employment offer or promise of future employment based on business decisions made on behalf of CareOregon.

We conduct ourselves with impartiality and objectivity in our relationships with vendors and other business partners. We do not let our personal relationships with business partners impact our business decisions, and do not show preference based on those relationships. We do not endorse goods or services offered by our business partners unless our Legal department has approved that endorsement. We may make these endorsements as individuals, but not on behalf of CareOregon or in our professional capacity.

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We Compete Fairly

CareOregon encourages collaborative relationships with other health care organizations that benefit our members and our business, but we will not participate in price fixing, bid rigging, boycotting, collusion, or any conduct creating an agreement with a competitor in violation of Federal or State antitrust laws. Generally, the laws prohibit conspiracies between competitors, improper attempts to monopolize markets or control prices, and certain unfair business practices.

We are Ethical in our Interactions with Government Agencies

We are committed to dealing honestly and fairly with government authorities and regulatory agencies. This includes complying with state and federal laws and cooperating with any valid government requests or process.

We do not make false reports. We make every reasonable effort to report accurate information (such as encounter data, financial statements, or Medicare bid information) to government agencies. If we learn that information provided was inaccurate, we contact our supervisors or the Compliance Team to determine how to correct the mistake. Knowingly making a false statement (whether verbal or written) is prohibited and could result in termination.

We fully cooperate with government investigations. If you receive a request from a government agency regarding an investigation, contact the Vice President of Audit & Compliance or the Chief Operating Officer immediately. Never attempt to obstruct an investigation or audit by lying or trying to mislead an investigator, and never destroy or alter documents requested by an investigator. Under all circumstances, we must tell the truth to government investigators or auditors.

CareOregon does not provide government officials with bribes (including gifts and entertainment) to influence their decision making. No payment or anything of value may be offered to a State or Federal government official or employee.

We Participate in the CareOregon Compliance Program

Compliance and Internal Audit periodically perform audits or reviews to ensure that operations follow Federal and State laws and regulations and are working the way they should be. This may include claims reviews, audits of financial transactions, analysis of billing patterns, or reviews of departmental policies and procedures.

The CareOregon Compliance Program exists to provide assurance that Federal and State laws and regulations are being followed, and that the work done at CareOregon is ethical and above-board. To be effective, a Compliance Program needs to have three lines of defense, and the first line of defense is our understanding of our responsibilities in the work that we do.

CareOregon requires that we understand your job responsibilities and the rules and regulations we must

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follow, and diligently work to follow these rules and regulations. As the first line of defense, if we see something going wrong, it is our responsibility to report it to our supervisor, manager, or to the Compliance Team. As mentioned above, CareOregon is a non-retaliation workplace, so if you raise a concern and feel that you are being retaliated against you should know that you are protected under the law. The Vice President of Audit and Compliance should be made aware of any retaliation. The CareOregon Compliance team serves as our second line of defense. When potential compliance issues arise, Compliance collaborates with operational partners to determine whether there is non-compliance. If non-compliance is substantiated, Compliance works with operational partners to ensure we strengthen the controls for the long-term. Together, operations and compliance create the necessary environment to keep CareOregon on track. Compliance is committed to being your partner.

Internal Audit serves as the third line of defense in our efforts to ensure that there are adequate controls in place to manage the risks that CareOregon encounters in our business. These risks may be financial, operational, or compliance related. Internal Audit provides an objective and independent perspective on how well we have managed our risks.

It is your responsibility to take part in the Compliance Program, by making sure that your day-to-day work is being done in compliance with regulatory requirements, and by cooperating with the Compliance and Internal Audit teams.

We Report any Concerns to Compliance

How you raise the issue is less important than making sure you raise it. There are several ways to contact your Compliance Department, there are multiple reporting avenues for internal employees to use via the intranet. You can submit a concern via email to ComplianceTeam@careoregon.org.

If you want to report a concern without giving your name, use the EthicsPoint Corporate Compliance Hotline Call Center at 1-888-331-6524 or file a report on the EthicsPoint Corporate Compliance Website, www.ethicspoint.com and include information on the incident. Reporting a compliance violation or Fraud, Waste, and Abuse concern is a condition of your employment at CareOregon. Failure to report a compliance violation or FWA concern could result in disciplinary action, up to and including termination of employment.

If a compliance issue is found, CareOregon takes corrective action to resolve the problem. All employees are expected to cooperate with investigation efforts. If the violation involves a subcontractor, CareOregon will take appropriate action under the contract.

RESPONSIBLE USE OF CORPORATE ASSETS

We Maintain Accurate, True, and Complete Business Records

We create and maintain business records that are accurate, true, and complete. We should never make false or misleading entries in any CareOregon accounts, financial documents, business reports or other

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business documents. We should also avoid omitting any information if doing so could be misleading. We should always ensure that information within our control is properly recorded, and fully, fairly, and accurately communicated to CareOregon personnel in a timely fashion. CareOregon must provide full, fair, accurate and timely disclosures in the reports, documents and other public communications that we file with or provide to relevant regulatory bodies, including the Centers for Medicaid and Medicare Services and the Oregon Health Authority.

CareOregon expects that records will be maintained in accordance with current regulations and the established company record retention policy. Altering records or intentionally creating false records is prohibited. In addition, confidential records, such as those containing Member information or personnel information, must be secured in a manner to ensure their confidentiality. Such records may be used only for business reasons and in compliance with applicable law.

We Follow Intellectual Property Laws

CareOregon follows the laws regarding intellectual properties, including patents, trademarks, marketing, copyrights, and software. CareOregon expects that information technology is managed in accordance with Information Systems policies. We do not copy CareOregon computer software unless it is specifically allowed in the licensing agreement. CareOregon only allows authorized persons to have access to computer systems and software based on their job duties and consistent with license agreements. CareOregon does not allow unauthorized access to its computer system, either directly or by network or telephone. Employees must never perform actions that could destroy or corrupt electronically stored or processed data.

We Protect Trade Secrets

Trade secrets are confidential information that, if disclosed, would give a competitor an unfair advantage. Examples of trade secrets are non-public documents such as strategic plans, development proposals, marketing strategies, and financial information. CareOregon's policy is that trade secrets may not be disclosed unless permitted by the Chief Executive Officer in consultation with legal counsel.

We Use CareOregon Property Appropriately

The personal use of CareOregon property – including supplies, equipment, and information – is prohibited unless approved by a supervisor. Reasonable, occasional, and brief use of telephones (except long-distance calls), e-mail, and the Internet for personal reasons is permitted if that use is consistent with company policy. Check with your supervisor about appropriate use for your job. CareOregon expects that any inventoried equipment or medical supplies will be used responsibly and properly, and in line with CareOregon policies and procedures.

RESPONSIBILITY TO OUR MEMBERS AND PATIENTS

We are all expected to act in the best interest of CareOregon and our members. This means we must

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never allow our personal interests to influence our actions on behalf of CareOregon. Every decision we make while on the job must be objective and with CareOregon and our member's best interests in mind. We value the relationships we have built with our members, suppliers, and other business partners. It is important that these relationships remain positive and ethical. This means:

We Protect our Members' Privacy

CareOregon is committed to preserving our members' privacy by protecting Protected Health Information (PHI) and following all laws and regulations related to privacy and the confidentiality of health information. This means following the requirements of the Health Insurance Portability and Accountability Act and other Federal and State laws. You have a responsibility and a duty to know and understand these laws and regulations and take every reasonable precaution you can to keep this information private. See the CareOregon Privacy Policy for more information.

We Treat our Members and Patients with Respect

CareOregon is committed to treating our members and patients with respect and dignity. This means providing our members with the kind of care that we would want, without judgement, discrimination, or dismissal of concerns or questions. CareOregon will not deny or place conditions on enrollment based on a person's health status. CareOregon does not target sicker enrollees or encourage them to disenroll from any of CareOregon's products for any reason. CareOregon will make meaningful efforts to recognize cultural differences among members and potential members. CareOregon is committed to following all Federal and State laws and regulations regarding conduct, as outlined by the Centers for Medicare and Medicaid Services, the Department of Health and Human Services, the Oregon Health Authority, and other regulatory entities.

We Provide Our Members and Patients with Quality Care

Quality applies to more than just medical care. Quality means doing our work with integrity, to the highest standards. Quality impacts our members through excellent customer service, prompt and accurate claims payments, reduced pain points, honest communication, and responsible stewardship of our resources. If your work for CareOregon includes direct member or patient care, CareOregon expects you to provide this care at the highest level possible.

RESPONSIBILITY TO YOURSELF

A violation of the standards described in this Code of Conduct or any CareOregon policy can result in disciplinary action, up to and including dismissal from employment or termination of your contract. Disciplinary action taken by CareOregon to uphold our Code of Conduct will be imposed consistently across the organization and in a fair and equitable manner. CareOregon has other policies and processes governing performance, conduct and behavior. Policy violations that are not Code of Conduct violations will be managed under the appropriate policy or procedure.

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We are Clear about Personal Opinions and Politics

CareOregon expects that you will not present opinions or make political statements on behalf of CareOregon online, as your personal and business personas are likely to overlap. When using social media (including personal social media accounts) you must not give the appearance that you are speaking on behalf of CareOregon. If you come across posts that are negative to CareOregon, you will not directly respond.

We Support Employee Rights

While we expect you to follow our Code of Conduct, we also recognize your rights as a CareOregon Employee. For example, you have the right to speak publicly about matters of public concern or to participate in certain activities related to the terms and conditions of your employment (including discussions about wages, hours, working conditions, health hazards and safety issues). Nothing in this Code of Conduct or in any company policy is intended to limit or interfere with your rights under the law.

This Code of Conduct is a statement of the fundamental principles that govern the conduct of CareOregon's business. It does not constitute an employment contract or an assurance of continued employment. It is not intended to and does not create any obligations to or rights in any employee, client, vendor, competitor, shareholder or any other person or entity.

We Report Concerns to Compliance

If you feel that something is happening that is unethical or out of Compliance, it is your duty to say something. You can bring the issue up to your supervisor or manager, or report the issue directly to the Compliance Team at ComplianceTeam@careoregon.org or to the Vice President of Audit & Compliance, Chris Zorn, at zornc@careoregon.org. If you are not comfortable with those options, you can anonymously report the issue via Ethics Point at www.EthicsPoint.com or 1-888-331-6524. EthicsPoint is anonymous, and your identity will be protected as permitted by law.

RESOURCES

TOPIC	LINK
Conflicts of Interest	Conflict of Interest Policy v.1 (policytech.com)
Information Security (Acceptable Use)	Acceptable Use Policy v.2 (policytech.com)
Procurement	Procurement and Contract Policy v.1 (policytech.com)
Business Expenses	HR Policy #414
Privacy Policy	Privacy Policy HIPAA v.1 (policytech.com)
Human Resources Policy Manual	Located in UKG
Information Security	Information Security Program Policy v.1 (policytech.com)
Trade Secrets	Confidentiality of Business Information Policy v.1 (policytech.com)
Non-Discrimination/Safe Workspace	HR Policy #104: Harassment and Discrimination
Procurement and Contracting Ethics	TBD

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