



Vendor Code of Conduct

eleHealth Holdings, LLC, a subsidiary of Louisiana Health Service & Indemnity Company (collectively, "Company"), is committed to conducting business with the highest standards of integrity and in full compliance with the laws and regulations that govern our business practices.

This Vendor Code of Conduct or "Code" establishes the standards and expectations for doing business with the Company. Vendors, their employees, agents, representatives and subcontractors (hereinafter referred to collectively as "Vendor") are expected to adhere to this Code while conducting business with or on behalf of the Company.

Ethical Work Principles and Expectations

The Company, its employees and vendors are expected to follow these ethical work principles:

- Deal professionally and honestly with others.
- Perform assigned duties using the highest ethical standards.
- Follow the laws, rules and regulations that apply to Company business.
- Provide a safe and respectful work environment.
- Protect the confidentiality of any data entrusted to Company by its customers, employees or other vendors.
- Conduct business without creating a conflict of interest with the Company.

The Company markets products based on price, quality and service. Company representatives are expected to deal fairly with the Company's customers, competitors, contractors and vendors. The use of Company funds or assets for any unlawful or unethical purpose is prohibited.

Conflict of Interest

Company employees and Board members are expected to act in the best interest of the Company when dealing with Vendors to avoid relationships that conflict, or appear to conflict, with the Company's best interest. As such, the Company prohibits the purchasing of goods or services from an employee, officer or Board member, and their immediate family. Familial, personal and financial relationships between the vendor, or its employees, and the Company, or its employees, must be fully disclosed to the Compliance and Ethics Department at **eleHealthProviderCompliance@eleHealth.com** prior to contracting.

Payments to Producers and Consultants

Agreements with producers or business consultants must be in writing and in accordance with the Company's standard forms and policies. These agreements must clearly and accurately set forth the services to be performed, the basis for earning the commission or fee involved, and the applicable rate or fee. All payments to such producers or consultants must be reasonable in amount, not excessive in light of the practice in the trade, and commensurate with the value of the services rendered.

Business Gifts and Entertainment

The Company has adopted a business courtesy policy that applies to all Company employees and Board Members. The policy establishes the monetary thresholds and approval requirements for the **accepting** or **offering** of business gifts and entertainment. As a vendor you need to be aware of, and comply with, these expectations when representing the Company and/or dealing with the Company and its employees.

In all circumstances a business courtesy must:

- Not include gifts of money or cash equivalent (gift cards or gift certificates).
- Not be solicited.
- Be consistent with accepted business practices.
- Not create the appearance of favoritism, improper influence or be perceived as a bribe.
- Not adversely affect the Company's reputation.
- Be infrequent in nature.
- Not violate any laws or this Code of Business Conduct.

Additional restrictions apply to the pharmaceutical industry, current vendors with performance issues, current vendor within six months of contract termination, and any vendor participating in an open request for proposals. For additional guidance or to request a copy of the business courtesy policy, please contact the Compliance and Ethics Department.

Proper Use of Company Assets

Vendors have the responsibility of safeguarding all Company assets against misuse, abuse, loss and theft. Company assets are for valid business purposes to the extent necessary to fulfill contractual obligations. Company assets include, but are not limited to, computer systems, electronic voice and data networks, and office supplies.

The Company's electronic mail system, telephone system and other information networks, including internet and intranet, should be used primarily for legitimate business purposes. Vendors are expected to conduct electronic communications in the same professional and respectful manner as all other business communications.

Improper use of electronic communications subjects the user to the Company's disciplinary policies.

Electronic communication systems, including internet/intranet and email, are for legitimate business purposes, and not for personal use, and cannot be used to send offensive or disruptive messages. The Company owns the electronic communication systems and therefore offers no guarantee of privacy or confidentiality of the communication content. The Company reserves the right to monitor and disclose the content of communications in accordance with all applicable laws and regulations. Improper use of electronic communications subjects the user to disciplinary action, up to and including contract termination.

All Company assets must be returned upon completion of duties, termination of vendor's contract or when otherwise requested by Company.

Protecting Information

System security access mechanisms including, but not limited to, computer passwords, and other personal security codes, are to be kept completely confidential. The Company uses security passwords and codes to authenticate the user and to establish approved access rights. The vendor is responsible for all actions under assigned security passwords and codes. Sharing a computer password/security code, or allowing unauthorized computer access, is a violation of Company policy and is subject to disciplinary action, up to and including contract termination. Data system security violations must be reported to a manager or to Information Security. Information Security will notify the Compliance Officer of any incidents that violate this Code.

Company policy prohibits using personal email to conduct Company business. This means Company information should never be sent to a personal email account, and/or uploaded or transmitted outside our secured environment using thumb drives, SharePoint sites, drop boxes, etc. Requests for exceptions to this policy must be submitted to the Privacy Officer for prior approval before use. Failure to follow this policy will result in disciplinary action, which may include contract termination.

Business records, including medical records, must be retained and their confidentiality protected, in accordance with the law and the Company's record and/or document retention policies.

Confidentiality

The Company and its vendors have the responsibility to protect the confidentiality of the data that is entrusted to us by employees, customers and other Company vendors. This data may include Protected Health Information (PHI) and Personally Identifiable Information (PII), such as name, birth date, address, telephone number, social security number, health status, medical history, diagnosis codes, other claims information, financial/banking information or dependent status.

Similarly, Company business information, trade secrets and other non-public, proprietary and confidential information cannot be disclosed, except as authorized by the Company or legally mandated.

Business records must be retained, and their confidentiality protected, in accordance with the law and the Company's record and/or document retention policies. This includes paper records, electronic information, such as computer files or electronic mail, and information stored on any other medium..

Government Relations

The Company operates in a highly regulated industry and therefore must comply with federal, state and local laws and regulations. As a contractor to the federal and state government, the Company and its vendors must follow special laws and regulations imposed by the government agencies. Penalties associated with a violation of these complex laws and regulations can be severe. Questions concerning these laws and regulations should be directed to the Compliance and Ethics Department.

Government Oversight

The Company operates in a highly regulated industry. It is the Company's policy to cooperate fully with any official government oversight activity, such as an inquiry, audit or investigation. Vendors are expected to provide full and timely cooperation with any government oversight activity.

Prohibited Activities

In all circumstances, the following activities are prohibited:

- Destruction of Company documents in anticipation of a request for those documents from a government agency or court.
- Alteration of Company documents or records.
- Lying or making misleading statements to government auditors or investigators during any investigation. Federal statutes make it illegal to make false statements to investigators under any circumstances.
- Pressuring anyone to hide information from government investigators or to provide false or misleading information.
- Retaliation, in any manner, against anyone for cooperating in an investigation.

Government Programs

Vendors working directly or indirectly on government contracts (e.g., Medicare, Medicaid, Federal Employee Program and Health Insurance Marketplace/Exchange) must know and comply with all the terms of the government contract and applicable laws and regulations of the program. In addition, vendors must not submit false or fraudulent claims for payment, make any false statements or representations, or do business with suspended, debarred, or excluded individuals or entities. Vendors must cooperate fully with any government requests for information. Additionally, vendors must never offer any gifts, entertainment, meals or anything of value to a government employee.

Ineligible or Excluded Persons and Entities

As a contractor of the federal government, the Company is prohibited by law from employing, contracting or doing business with any person or entity that is currently debarred, suspended, excluded, proposed for debarment or declared ineligible to participate in federal healthcare programs. The Company screens all applicants and routinely screens current employees, officers, Board members, customers, brokers and vendors against the federal government's excluded parties' lists.

False Claims Act

The False Claims Act prohibits knowingly presenting (or causing to be presented) to the federal government a false or fraudulent claim for payment or approval. Additionally, it prohibits knowingly making or using (or causing to be made or used) a false record or statement to get a false or fraudulent claim paid or approved by the federal government or its agents.

Anti-Kickback Statute

It is a violation of the federal Anti-Kickback Statute, as well as the Code of Business Conduct, to offer, pay, solicit or receive "remuneration" (i.e., something of value) in exchange, directly or indirectly, for the referral of any government-sponsored business, unless it falls within certain "safe harbors" specified under federal laws. In addition to criminal and monetary penalties, violations of the statute may cause an individual or entity to be excluded from participation in Medicare and/or other federal healthcare programs.

Violations of State or Federal Regulations

The Company will continually monitor its compliance with applicable state and federal regulatory requirements. The Company has a contractual obligation to report any suspected fraud, waste or abuse pertaining to government sponsored programs. Board members, officers, employees, brokers or vendors who willfully conduct business that is contrary to, or is in violation of, a government regulation and/or Code of Business Conduct, will be subject to prompt disciplinary action, up to and including termination of their relationship, employment or contract, in addition to any criminal or civil penalties administered by the appropriate government or law enforcement agency. These laws also protect "whistleblowers" — people who report noncompliance or fraud, or who assist in investigations — from retaliation. The Company prohibits retaliation of any kind against individuals exercising their rights under the Federal False Claims Act or similar state laws.

Reporting Violations and Seeking Assistance

Company employees, officers, Board members, broker, and vendors, have an obligation to report any suspected or actual Code of Business Conduct violation, accounting, internal control or auditing irregularities, directly to the Compliance and Ethics helpline/hotline. The toll-free line or web reporting options are available for anonymous reporting 24 hours a day, 365 days a year.

Contacting the Compliance and Ethics Department

Hotline: Call: 1-844-644-2583 (Anonymous)

**Web Reporting: www.mycompliancereport.com/MCR
(Company ID: BCBSL)**

Write: Compliance and Ethics Department
P.O. Box 84656
Baton Rouge, LA 70884-4656

Fax: (225) 295-2599

Email: eleHealthProviderCompliance@eleHealth.com

Protection for Retaliation

The Company strictly enforces its non-retaliation policy, protecting those who, in good faith, report suspected wrongdoing or cooperates in an investigation. Likewise, Vendors shall not retaliate against their employees or the Company's employees, who in good faith, report potential wrongdoing or cooperate in an investigation. Violation of this policy can result in termination of contract.

Protecting the Company Against Fraud, Waste and Abuse

The Company takes the fight against health care fraud and abuse very seriously. The Company has a department dedicated to preventing fraud, waste or abuse — the Financial Investigations Department (FID). The FID includes a staff of trained professionals with expertise in investigations, healthcare, claims processing, law enforcement and accounting. These professionals carefully review all allegations of suspected fraud, waste or abuse.

Fraud Hotline: 1-844-644-2583

A toll-free Fraud Hotline is available to employees, members, business partners and network providers for reporting suspected fraud, waste and abuse situations. The toll-free line is available for anonymous reporting 24 hours a day, 365 days a year.

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