Integrity and Ethics Work at WPS Health Solutions

Today, consumer confidence and trust in business are low, but slowly improving. That’s why integrity and ethics are vital at WPS Health Solutions. We are so fortunate to work for one of the most respected companies in our industry.

Since 1946, our commitment to honesty and integrity has earned WPS a reputation for excellence. In 2018, we were named one of the World’s Most Ethical Companies® by the Ethisphere® Institute, a leading business ethics think tank, for the ninth year in a row. We’re proud to have earned this distinction so many times.

This Code of Conduct embodies the principles we value most, and its purpose is to help us live up to our values in all of our business dealings. The Code includes examples, commonly asked questions, and links to more detailed policies. The WPS Board of Directors has approved this Code, which applies to all employees of WPS and WPS subsidiaries, as well as contracted and temporary employees, board members, and officers.

It is up to each of us to take personal responsibility for conducting business with honesty, integrity, sincerity, and truthfulness consistent with this Code. Please read the Code and refer to it often. Stay current with your ethics training. If you have questions, ask for guidance, either from your supervisor or your compliance officer.

I urge you to speak out if you encounter a situation, decision, or action that might violate this Code. Raising concerns takes courage, but it is essential to ensuring that we conduct business with integrity. Please rest assured that WPS Health Solutions will not tolerate any form of retaliation or harassment against any employee for reporting or inquiring in good faith about potential violations. I am personally committed to maintaining an environment where people are encouraged to raise issues.

I’m proud to be part of an organization that encourages such high standards for ethical business behavior, and I thank you for your commitment to these principles. By adhering to this Code of Conduct, WPS Health Solutions will continue to succeed as a trusted Wisconsin health insurer, benefits administrator, employer, and business partner, and set an example for other companies to follow.

Michael F. Hamerlik
President and Chief Executive Officer
A Message from our Compliance Officers

WPS Health Solutions is well-respected in the business community for being trustworthy and ethical. Our goal is to help you maintain our hard-earned reputation as great companies to work for and great companies with which to do business. Our commitment to this Code of Conduct allows WPS Health Solutions to provide a safe, ethical, and productive workplace.

Behaving ethically and complying with the laws and regulations is a personal and professional responsibility. Employees who come forward with questions and concerns about our business ethics or compliance with the law play an important role in maintaining our ethical workplace. Never assume that your supervisor or someone higher up is aware of every ethics or business issue that concerns you. If you're unclear about something, take action. Reach out and give us a chance to help. You should promptly report suspected violations of law or of this Code of Conduct to your immediate supervisor, to your department’s Compliance Officer, or to Human Resources, if your concerns are Human Resources-related. We have an open-door policy and welcome the opportunity to help you with any suspected ethical or violation-of-law dilemma. You may also make an anonymous call to the EthicsPoint Helpline at 866-293-2391 or report anonymously through the Helpline’s website at ethicspoint.com. The Helpline and website are available 24 hours a day, 365 days a year. We do not tolerate any form of illegal discrimination or retaliation against anyone who, in good faith, reports suspected violations of law or of this Code of Conduct.

Please do more than just read this Code of Conduct—follow its guidance and make this Code a part of your everyday work life.

Jane Keller-Allen
Corporate Compliance Officer
608-97(7-8017)

Glenda Carter
Military and Veterans Health Compliance Officer
757-76(6-5006)

Kirsten Dorn
Medicare Compliance Officer
608-97(7-5504)

Angela Julian
Medicare Part D and BSA/AML/OFAC Compliance Officer
608-97(7-6615)
Use the following questions as a guide during any decision-making process:

? Is your proposed action unlawful? Does it violate the law, this Code, and/or our other corporate policies?

? Would you be embarrassed if your proposed action was published in the news media or posted on the web?

? Is your proposed action something you would not want your family members to know about?

If you answered “yes” to any of these questions, you should and take a different course of action.
WPS Health Solutions Code of Conduct

What We Value …

Wisconsin Physicians Service Insurance Corporation and its wholly owned subsidiaries, The EPIC Life Insurance Company (EPIC Specialty Benefits) and WPS Health Plan, Inc. (Arise Health Plan) (collectively, “WPS Health Solutions”), enjoy a long-standing reputation of treating our customers and employees with honesty and integrity. Today, more than ever, we need to maintain our strong reputation to succeed in a challenging business environment. By following this Code of Conduct (“Code”), we will make sure that our business activities and decisions reflect our corporate values and goals.

Each of us should work honestly and with integrity with our fellow employees and customers. We also should treat our contractors, suppliers, business competitors, and government regulators professionally, fairly, and honestly.

We should never take advantage of anyone through any unfair, unlawful, or unethical business practice. As employees, we must always conduct ourselves and our business dealings honestly and with the highest ethical standards, not just the minimum required to meet legal, ethical, or procedural requirements.

This Code applies to everyone at WPS Health Solutions—members of our Board of Directors, our officers, and all full-time, part-time, temporary, and contracted employees. We also expect all of our contractors, suppliers, agents, and other business partners to follow the same values and goals.

Nothing in this Code of Conduct is intended to prevent employees from engaging in concerted activity protected by law.
WPS Health Solutions Corporate Values

We are proud to provide service and value considered by our customers to be the very best. We also are proud to have a workplace that allows employees to balance work and family, and encourages employees to grow professionally and to work together as a team.

WPS Health Solutions promotes a Values Program that focuses on four core values:

- Individual Responsibility
- Customer Focused
- Mutual Respect
- Driven and Passionate

Visual and interactive displays throughout our organization reinforce the values message and the expectation that we will live the values through our actions.

Following Laws, Regulations, and Corporate Policies

We must comply with all federal, state, and local laws and regulations. This includes state insurance regulations, Federally Facilitated Marketplace (FFM) regulations, employment laws, and the federal Medicare, TRICARE, and Department of Veterans Affairs laws and regulations. We also must comply with our WPS Health Solutions compliance programs and corporate policies and procedures. Because we do business in many locations, WPS Health Solutions may be subject to multiple laws and regulations. If any law or regulation is unclear, please ask your supervisor or your department’s Compliance Officer for clarification and guidance.
Special Obligations of Supervisors

Each of us must comply with this Code. Supervisors have additional responsibilities, including serving as ethical role models by following this Code at all times through both words and actions. Supervisors also must make sure this Code is communicated to all employees who report to them, and that each employee receives the appropriate training about this Code and all other required training.

Retaliation Prohibited

We will not tolerate any form of illegal discrimination or retaliation by one of our employees against any person who, in good faith, reports suspected violations of any law or regulation, this Code, or any corporate policy or procedure. Under our WPS Health Solutions Non-Retaliation Policy and applicable laws and regulations, we may not discharge, demote, suspend, threaten, harass, or in any manner discriminate against any employee because that employee reports or participates in the investigation related to one or more suspected violations.

What if…?

Q: What if you report a potential or actual ethical violation involving your supervisor? Will you get in trouble or will your supervisor make your job more difficult for you?

A: No. Each employee is responsible for reporting any potential or actual violation of this Code or laws and regulations. You will not get in trouble if, in good faith, you report such a situation. In addition, we will not tolerate any retaliation against you for filing your report in good faith.
Conflicts of Interest

We value ethical decision-making and trust employees to make choices in the best interests of WPS Health Solutions, our customers, and our business partners. A conflict of interest might exist when your personal interests do not agree with the business interests of WPS Health Solutions.

You must not use your employment with WPS Health Solutions for personal gain or for gain to a member of your family to the detriment of the WPS Health Solutions’ business interests. Outside financial or business involvement by you, members of your family, or close friends, may create a possible or actual conflict of interest. In these cases you must be especially careful regarding issues of security, confidentiality, and conflict of interest. In addition, situations that may appear to create a conflict must be avoided. You must report potential or actual conflicts of interest to your supervisor, to your department’s Compliance Officer, or to Human Resources. You are required to annually complete a conflict of interest questionnaire. If your situation changes during the year, you must report new potential or actual conflicts of interest to your supervisor, your department's Compliance Officer, or Human Resources, and update your conflict of interest questionnaire.

In addition, you must not: (1) take personal advantage of opportunities that are discovered while using WPS Health Solutions’ corporate property, sensitive information, or your employment with us; (2) use WPS Health Solutions’ corporate property, sensitive information, or your employment with us for personal gain; or (3) compete in business against WPS Health Solutions.

A conflict of interest might also arise if any of your outside activity negatively impacts your judgment while at work, or your performance of your job’s duties. Whether you’re volunteering with, or working for, a competitor or organization doing or seeking to do business with us, you must report this to your supervisor, to your department’s Compliance Officer, or to Human Resources to determine whether a conflict exists due to your other job.

This provision does not in any way prohibit employees from engaging in protected activities, such as sharing wage and salary information or employee contact information with union representatives or government investigative bodies so long as the employee did not obtain this information through performance of his or her own essential job functions.
What if … ?

Q: I received a $15 movie gift card from one of our customers who was very happy with the way I helped her solve her problem. Can I keep it and use it?

A: No. We must never accept cash or cash equivalents such as gift certificates. You should return the gift card with a note of thanks and an explanation of why you cannot accept that gift.

Q: At a conference, a vendor was handing out coffee mugs printed with their company logo. May I accept this kind of gift?

A: Yes. This kind of promotional gift is readily available to others attending the conference and usually is worth only a nominal value, so it’s OK to accept it.

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If you think a situation might create a conflict of interest, ask yourself the following questions:

- Could the situation interfere with, or give the appearance of interfering with, any of your job duties with WPS Health Solutions?
- Could it affect any business decision that you might have to make?
- Are you or a member of your family receiving improper personal benefits, such as financial benefits, through the activity due to your employment with WPS Health Solutions?
- Would you be embarrassed if anyone knew about the situation?

If you answered yes to any of these questions, you may have a potential or actual conflict of interest. You should discuss this with your supervisor, your department’s Compliance Officer, or Human Resources.

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Gifts and Entertainment

You must not give or receive gifts that could appear to be an attempt to improperly influence your decisions that affect WPS Health Solutions. Accordingly, you need to avoid any perception that giving or receiving gifts, entertainment, or other gratuities is connected with an attempt to obtain favorable treatment.

However, depending on the area of the company you work in, you may offer or receive gifts and entertainment commonly accepted as business courtesies, as long as they are of nominal value, infrequent, and will not inspire favoritism or a sense of obligation. For example, what is acceptable in our commercial business environment may be completely prohibited in our government business environment and vice versa. If you have questions on what may or may not be acceptable, please contact your compliance officer.

You must never accept gifts of money or cash equivalents such as gift certificates. Strict guidelines prohibit you from giving cash, gift certificates, or other gratuities or items of value to state, local, and federal employees. For further guidance, please review the WPS Health Solutions Business Gifts and Entertainment Policy.
What if … ?

Q: You just hired a new employee, Tom, to work in your department. He has extensive experience and knowledge about our business competitors. You’d like to learn as much as you possibly can about our competitors. How much information can you ask Tom to provide to you?

A: You should not ask for any confidential or proprietary information about our business competitors, nor should you allow him to volunteer such information. Tom probably has an obligation to protect confidential information about his former employer just as WPS Health Solutions expects all of its former employees to abide by their obligations to protect our sensitive information.

Q: Privacy laws only cover personal data, like medical history, Social Security numbers, and credit card numbers, right?

A: Wrong. Privacy laws apply to all data that can identify a specific person. Examples include email addresses, home addresses, birthdates, telephone numbers, account numbers, photographic images, etc. You must always use and store this information in accordance with all privacy requirements.

Privacy and Confidentiality of Sensitive Information

We all use sensitive information to perform our jobs. Our claims processing systems, customer accounts, employee records, bank records, and billing records all contain sensitive information about our employees, our customers, and about WPS Health Solutions. In addition, many of us deal with financial forecasts, business plans, proposal information, and other documents that are sensitive because they provide a unique, competitive advantage to WPS Health Solutions.

Disclosure of WPS Health Solutions’ sensitive information could put us at a serious competitive disadvantage or could harm or embarrass employees, customers, or WPS Health Solutions. Therefore, we must take precautions to avoid improper or accidental disclosures of, and access to, WPS Health Solutions’ sensitive information. Please review the WPS Health Solutions Information Security Policy for further guidance.

We are required by our own corporate policies, as well as by state and federal laws and regulations, to protect the confidentiality, integrity, and availability of Protected Health Information (PHI), Personally Identifiable Information (PII), and all other sensitive information that WPS Health Solutions creates, maintains, receives, or transmits during the course of our business operations. Regarding PHI, the Health Insurance Portability and Accountability Act (HIPAA) establishes rules that restrict who can access and/or receive PHI and sets limits on how PHI can be used and disclosed. WPS Health Solutions has developed corporate policies for properly handling and disclosing sensitive information in accordance with HIPAA and other applicable state and federal laws and regulations.

Our corporate files, records, and computer systems, including our email systems, are solely the property of WPS Health Solutions and at all times remain subject to access and review by WPS Health Solutions.

Your failure to comply with our corporate policies governing privacy and the confidentiality of sensitive information will subject you to discipline up to, and including, termination of your employment. In addition, your failure to comply with the applicable laws and regulations governing privacy and the confidentiality of sensitive information may subject you to legal action for damages or indemnification. This provision does not in any way prohibit employees from engaging in protected activities, such as sharing wage and salary information or employee contact information with union representatives or government investigative bodies so long as the employee did not obtain this information through performance of his or her own essential job functions.
What if … ?

Q: I write an internet blog on various subjects on my own personal time using my own equipment. I enjoy doing this, and I must be good at it because I have a lot of followers and people commenting on my posts. Sometimes I talk about current issues regarding health care and health insurance. I think it would be great advertising for WPS if I included the WPS logo with my signature. It’s free advertising so I don’t see a problem with it. Can I do this?

A. No. Employees must respect the laws regarding copyrights, trademarks, rights of publicity, and other third-party rights when using, posting, or publishing on social media. Do not infringe on WPS logos, brand names, taglines, slogans, or other trademarks.

Responsible Social Media Use

Social networking has become a common occurrence and popular activity in our everyday lives. However, due to security and privacy protection considerations, most employees do not have access to social media sites using company computers or other company-supplied communication devices or equipment at WPS Health Solutions.

We respect your right to use social media on your personal time, whether at work or away from work, when using your personal computer or your other personal communication device or equipment. The WPS Health Solutions Personal Use of Social Media on the Internet policy provides guidance for your use of social media to publish your personal expression, on your personal time, using your personal equipment, regarding WPS Health Solutions and our employees’ work-related activities. Highlights of this policy include, but are not limited to, the following guidance:

- You must not use your WPS Health Solutions business email address when using social media.
- You must make it clear to your readers that your views and opinions are yours alone and are not attributed to WPS Health Solutions.
- You are not authorized to speak, write, post, or publish on behalf of WPS Health Solutions, or to represent that you are so authorized, unless given written permission in advance by senior management of WPS Health Solutions.
- You must not post or publish any statements that would violate WPS Health Solutions’ Anti-Discrimination and Anti-Harassment Policy.
- You must respect the laws regarding copyrights, trademarks, rights of publicity, and other third-party rights when using, posting, or publishing on social media. Do not infringe on WPS logos, brand names, taglines, slogans, or other trademarks.
- You must not post, publish, or disclose any confidential, proprietary, business, or financial information owned by WPS Health Solutions.
- You must not use, post, publish, or disclose any Personally Identifiable Information (PII) or Protected Health Information (PHI) regarding any of our insureds, members, beneficiaries, customers, or health care providers.

Employees who are authorized to access and use social media for WPS Health Solutions’ business purposes must follow the The WPS Health Solutions Business Use of Social Media on the Internet policy.
What if … ?

Q. I saw an employee confront another employee in the company parking lot. Their voices were raised and one employee shoved the other employee, and then the two employees went their separate ways. Should I report this?

A. Yes. Any physical altercation between our employees is inappropriate workplace conduct, which is prohibited. You should immediately report it to your supervisor, your department’s Compliance Officer, or Human Resources.

Respecting Intellectual Property of Others

WPS Health Solutions’ intellectual property is an extremely valuable asset and needs to be properly protected. At the same time, we must not infringe upon the intellectual property rights of others. Intellectual property includes, but is not limited to, trademarks, copyrights, patents, trade secrets, and proprietary business and customer information.

Whether preparing advertising or promotional materials using the name or printed materials of another company, or using software purchased from outside vendors, you must ensure that the trademarks, copyrighted materials, and other intellectual property owned by others are used properly and only with the owner’s permission. In addition, you can generally only copy documents and other materials with the owner’s permission or when those documents and other materials are in the public domain and not protected by copyright laws. If you need guidance about this subject, please contact the WPS Legal Department.

Protection of Company Assets

In addition to WPS Health Solution’s intellectual property, company assets—such as funds, facilities, equipment, vehicles, and information technology—as well as our company’s reputation, must be protected. We expect employees to appropriately use and protect company assets, as well as the assets of our customers and suppliers.

Property provided by third parties must be used and managed according to the terms of the relevant contract.

Employees must safeguard and make only proper and efficient use of WPS Health Solutions property. All employees shall seek to protect WPS Health Solutions property from loss, waste, damage, misuse, theft, fraud, embezzlement, and destruction.

Health, Safety, and the Environment

Our employees are our most valuable corporate resource, and we are committed to maintaining a safe and healthy work environment for our employees and visitors. Whether you’re walking across the parking lot or sitting at your desk, your personal safety is our top priority. Our objective is to prevent any accident and/or injury. You are required to follow all safety laws, regulations, and corporate policies and procedures. You should report any unsafe situation or condition immediately to your supervisor. Please review the WPS Corporate Safety & First Responder Manual for more information.
What if … ?

Q. One of my co-workers, Jill, frequently smells of alcohol, especially after lunch. I suspect Jill is drinking alcoholic beverages during the day while working. Should I do something?

A. Yes. You should immediately report it to your supervisor, your department’s Compliance Officer, or to Human Resources for your location.

We do not tolerate workplace violence of any kind, including, but not limited to, threats, verbal abuse, bullying, harassment, and physical attacks. Such actions are prohibited. Contact your supervisor, your department’s compliance officer, or Human Resources immediately if you witness or experience any threatened or actual incidents of violence in the workplace.

In addition, we prohibit the unlawful manufacture, distribution, dispensation, possession, use, or unlawfully being under the influence of any controlled substance or other illegal drugs on WPS premises or while the employee is in the course of employment activities. We also prohibit the consumption of, use of, possession of, or being under the influence of, intoxicating beverages on WPS premises or while the employee is in the course of employment activities, except for the following very limited exceptions: specific external business-related meetings and WPS Health Solutions’ business and social functions at which the availability of intoxicating beverages has been approved in advance by WPS Health Solutions senior management for employees’ responsible consumption at such meetings and/or functions. An employee’s irresponsible and/or excessive consumption of intoxicating beverages at such meetings and/or functions is prohibited.

Equally important, no firearms or other weapons are allowed on WPS Health Solutions’ property or when the employee is in the course of employment activities, as allowed by applicable state and federal law.

We are also committed to doing our part to make the planet a healthier place. Respecting and protecting the environment benefits everyone, and it is our collective responsibility to conserve and protect our renewable resources and do all we can to reduce, reuse, and recycle, and identify new opportunities to increase the energy efficiency of our facilities and operations. Even small changes can have a lasting impact, such as recycling bulbs, paper, plastic, aluminum, and cardboard, and replacing high-usage lighting systems.

Human Trafficking

We abide by the federal government’s policy prohibiting trafficking in persons, including prohibiting the following activities.

- Engaging in severe forms of trafficking in persons;
- Procuring commercial sex acts;
- Using forced labor;
- Destroying, concealing, confiscating, or otherwise denying an employee access to the employee’s identity or immigration documents, such as passports or driver’s licenses, regardless of issuing authority;
- Using misleading or fraudulent practices during the recruitment of employees or offering of employment, such as failing to disclose, in a format and language accessible to the employee, basic information or making material misrepresentations during the recruitment of employees regarding the key terms and conditions of employment, including wages and fringe benefits,
What if … ?

Q: When a specific project is completed, can I throw out all the project documents?

A: Record retention requirements differ from department to department and project to project. Additionally, WPS Health Solutions has a legal obligation to prevent the destruction of records related to an investigation, claim, lawsuit, or other legal proceeding or action. Talk to your supervisor if you aren’t sure what to do with your records.

the location of work, the living conditions, housing and associated costs (if employer or agent provided or arranged), any significant costs to be charged to the employee, and, if applicable, the hazardous nature of work;

- Using recruiters that do not comply with local labor laws of the country in which the recruiting takes place;
- Charging employees recruitment fees;
- Failing to pay return transportation costs upon the end of employment, for certain employees who are not nationals of the country in which the work is taking place;
- Providing or arranging housing that fails to meet the host country housing and safety standards; and
- If required by law or contract, failing to provide an employment contract, recruitment agreement, or other legally required work document in writing in a language the employee understands, containing a detailed description of the terms and conditions of employment, at least five days before an employee relocates to perform work.

Accurate and Complete Records and Reports

We create many documents, emails, reports, and other records during our normal course of business. We always must be honest and forthcoming and provide full, fair, accurate, complete, and timely information to every person who receives our records. We should never submit false, fraudulent, or misleading information, particularly with respect to information that is connected to services provided to the federal, state, or local governments. We also must safeguard our records and maintain all records with the appropriate level of privacy/security protection.

Retention of Documents and Document Integrity

To satisfy many of our regulatory and legal requirements, it is necessary to retain our records for a certain period of time. These records can be printed copies as well as electronic copies. Specific federal and state requirements state that we must maintain certain records for specific periods of time, indicate when records should be destroyed, and indicate when they must be shipped to state or federal authorities. WPS Health Solutions has developed a Record Retention Policy and associated policies and procedures that apply to the records that you create and use while performing your job.

You should never inappropriately destroy any WPS Health Solutions record. Nor should you use or disclose records in any way that would violate the Record Retention Policy or WPS Health Solutions’ corporate policies regarding privacy and security. In addition, you may not knowingly alter or make a false entry into any record with the intent to deceive or unduly influence an audit, a criminal investigation, or the proper administration of any matter.
Inquiries from the Media
Properly managing media relations and responding to the public are important aspects of WPS Health Solutions' business activities. We as a company want to speak with one voice and present clear, concise, and consistent information at all times. Therefore, you should not contact the media or make statements to any member of the media on behalf of WPS Health Solutions.

If you are approached by a news reporter or any member of the media about WPS Health Solutions’ position on a public issue or event, you should refer the reporter to our Executive Vice President of Business Development and Marketing.

You should never disclose WPS’ confidential business information, trade secrets, or other information that WPS is obligated by contract and/or law to keep private. Additionally, you should never share confidential information about our business partners, vendors, or customers.

Antitrust and Unfair Competition
Competition is the cornerstone of this country’s free-market economy, and we expect to compete strongly in the marketplace. When we compete, however, we must conduct our business affairs in accordance with antitrust and related trade laws and regulations. These laws and regulations generally encourage healthy competition in the marketplace and protect consumers against anti-competitive activities, such as monopolies and price fixing. We also must avoid any situation or circumstances that can create any suspicion of a violation.

You always should check first with our WPS Legal Department before entering into any business arrangement so as to ensure that the proposed business arrangement complies with these laws and regulations and with any other local laws and regulations. If you have any questions about these rules, you should seek guidance from an attorney in our Legal Department.

Political Activity and Lobbying
As responsible citizens, you have the right to participate in the political process. WPS Health Solutions encourages you to do so, including exercising your right to vote. It is important, however, for you to ensure that your personal political views are not mistaken for corporate views. When you participate in the political process, you also must make it clear to other participants that you do not represent WPS Health Solutions. Also, you cannot make any personal political contributions on behalf of WPS Health Solutions.

What if … ?
Q: I have been approached by a member of the media asking about WPS Health Solutions' official position on a matter. What should I say?

A: You should answer with one of the following statements: “I am not authorized to comment for WPS Health Solutions” or “I don’t have the information you want.” It may also be appropriate to add: “I will ask our Corporate Communications office to contact you.”

Q: You are a strong supporter of a political candidate whom you think will improve the business environment for WPS Health Solutions. Can you use the WPS Health Solutions’ computers, printers and paper, and other office equipment to prepare, copy, and distribute this candidate's political materials?

A: No. Even though the election of the candidate may help WPS Health Solutions, you may not use WPS Health Solutions' corporate resources to help the candidate or help his or her campaign. Your personal political activities must be kept separate from your employment with WPS Health Solutions.
Here are some basic rules you must follow:

- Do not use company time or equipment to support your personal political activities.
- Ensure that it is clear that your actions and views are your own and not those of WPS Health Solutions.
- If you run for or accept a public office, you should notify your supervisor in advance. You should discuss with your supervisor whether your official duties in that public office might affect your ability to perform your job or be a conflict of interest for you.

From time to time, WPS Health Solutions will engage in public policy debate on subjects of legitimate business concern to us, our staff, and the communities in which we work. We may do this by using the political process, including lobbying. Lobbying on behalf of the corporate interests of WPS Health Solutions is highly regulated by federal, state, and local laws and regulations. The Vice President of Government Relations is responsible for our lobbying activities. If you have a question about these rules, you should immediately seek guidance from the Vice President of Government Relations.

**Fair Purchasing Practices and Procurement Integrity**

We must ensure that we make all purchasing decisions fairly, objectively, and in the best interests of WPS Health Solutions. We work to ensure supplier diversity, and do not allow our personal relationships to influence, or appear to influence, our purchasing decisions. This means we must follow at all times the bidding, negotiating, and contracting procedures that we’ve established at WPS Health Solutions.

**Bribery and Corrupt Practices Prohibited**

You must always follow ethical business practices while performing your job. You should never offer or accept bribes or kickbacks. A bribe or kickback doesn’t always have to be in cash. It can be lavish entertainment, gifts, or hospitality. If you are unsure if a payment or gift is a bribe or kickback, you should seek guidance from our WPS Legal Department or your department’s Compliance Officer.

**Equal Employment Opportunity**

We offer a positive, productive work environment that promotes equal employment opportunity and prohibits discriminatory practices. We are committed to treating all employees with respect and dignity. Employment decisions at WPS Health Solutions are based upon an individual’s qualifications, skills, and performance, without regard to race, color, sex, age, disability, veteran status, religion, national origin, sexual orientation, gender identity or expression, or any other personal characteristic protected by applicable law. All employment-related decisions must be made in compliance with all federal, state, and local laws and regulations prohibiting illegal discrimination in employment.
Harassment

We are committed to providing you with a harassment- and discrimination-free work environment and will work hard to resolve any situations where you have reported such behavior. We will not tolerate verbal, written, or physical conduct that disparages or shows hostility or aversion toward an individual because of his/her race, color, religion, creed, age, disability, national origin or ancestry, veteran status, or any other characteristic protected by law. Nor will we tolerate unwelcome conduct of a sexual nature that creates a sexually hostile work environment or impacts the terms or conditions of your employment. In addition, we do not tolerate any form of illegal discrimination or retaliation against you because you, in good faith, reported suspected violations of this Code, or of any laws or regulations, or of any corporate policies.

Resolving Your Concerns and Questions
— As Easy as 1, 2, 3

It is your duty and obligation to promptly report any actual or suspected violation of this Code, any violation of law or regulation, or violation of any of our other corporate policies and procedures.

1. Ethical question or concern

2. Ask
   • Ask your supervisor or department's head first

   If you are uncomfortable with this, ask:
   • Your department Compliance Officer
   • Human Resources, if your concerns are Human Resources-related
   • EthicsPoint Helpline at 866-293-2391 or ethicspoint.com

Or, if it is a legal question, ask:
• WPS Legal Department

3. Resolution
Your question or concern will be taken seriously and reviewed. A resolution will be sought and appropriate action will be taken. You will be provided with as much information as possible as to the resolution.

What if … ?

Q: What if your supervisor, Barb, keeps asking you out on a date? You've told her that you are not interested, but she keeps pressing you. If you complain, could you lose your job with WPS Health Solutions?

A: No. You are entitled to work in an environment free from intimidating, hostile, or offensive behavior. Report this situation immediately to your manager, to your department’s Compliance Officer, to Human Resources, or report it using the EthicsPoint Helpline.

Q: Sue feels harassed by her co-worker Dave. Dave constantly comments on Sue’s appearance in a way that makes her feel uncomfortable and embarrassed. Sue has begun to dread coming to work because of Dave’s comments. What should Sue do?

A: The co-worker’s behavior is creating an intimidating and offensive environment for Sue. Sue must report the situation to her supervisor, to her department’s Compliance Officer, to Human Resources, or report it using the EthicsPoint Helpline.
We recognize our obligation to protect the privacy, including identity, of our employees who report suspected violations. During our investigation of your report, we will only share the information you provide on a “need-to-know basis,” and not take action unless we believe, in good faith, that such action is based on credible evidence. Investigations of allegations of wrongdoing will be conducted by us with care and discretion, by using persons experienced in conducting such investigations, and by keeping the persons who are made aware of the reported allegations to the absolute minimum necessary to properly, fully, and fairly conduct the investigation and determine the appropriate response. Based on the nature of the reported allegations and the outcome of the investigation, it may be necessary to advise law enforcement officials and/or senior management of WPS Health Solutions. If you are asked to participate in an investigation, you have a duty to cooperate fully with the investigation. Failure or refusal to participate or to provide full and truthful disclosure may result in disciplinary action.

Taking Action
As an employee of WPS Health Solutions, you must take personal responsibility for your own behavior. You have the responsibility to read, understand, and comply with this Code and to know the specific requirements that apply to your job. As a condition of your employment at WPS Health Solutions, you must certify that you have read, understand, and will abide by this Code. Any employee’s violation of this Code harms WPS Health Solutions and all of our employees. The result can be negative publicity, embarrassment, loss of WPS Health Solutions’ respect and reputation, loss of business, financial loss, or, in the worst case, criminal prosecution and penalties, if convicted.

An employee who violates any provision of this Code or related corporate policies and procedures is subject to appropriate disciplinary action, including termination. A contractor may be subject to termination of his/her assignment at WPS Health Solutions and/or civil or criminal action. In addition, supervisors may be subject to the same disciplinary action if the supervisor knowingly or negligently allowed the employee or contractor to violate any provision of this Code or related policies and procedures.

This Code does not take the place of or supersede any other agreement or contract between any subsidiary of WPS Health Solutions and its employees.

WPS Health Solutions will update and revise this Code, as needed, in response to changes in the legal, regulatory, and/or business environments.

Each of us is responsible for acting with honesty and with integrity.
Certification

This is to hereby certify that I have received, read, and understand this WPS Health Solutions Code of Conduct. I agree to abide by and fully comply with the requirements contained in this Code, all related WPS Health Solutions corporate policies and procedures, and all federal, state, and local laws and regulations applicable to my job with WPS Health Solutions.

I understand and agree that if I have any questions regarding this Code, I can contact my supervisor or my department Compliance Officer. I further understand and agree this Code and Certification do not constitute, and are not, an employment contract between me and WPS Health Solutions or between me and any other person.

__________________________  __________________________
(Print Name)       (Print Position or Title)

__________________________
(Print Department Name)

By: __________________________
(Signature)

Date: __________________________