Overall Standards

For more than 70 years, Wisconsin Physicians Service Insurance Corporation and its wholly owned subsidiaries, The EPIC Life Insurance Company (EPIC) and WPS Health Plan Inc. (Arise Health Plan), (collectively, “WPS Health Solutions”) have provided quality products and services to our customers. We view our contracted vendors and suppliers (collectively, “Suppliers”) as an integral part of our business success, and we strive to select only those organizations that share our commitment to strong ethical standards. We understand that Suppliers are independent entities; however, we expect our Suppliers to adhere to our standards of ethical business conduct and compliance with all applicable laws and regulations while they are conducting business with or on behalf of WPS Health Solutions. Each Supplier is required to adhere to and comply with this Supplier Code of Conduct (“Code”) and to educate itself, its employees, and its agents and representatives about this Code’s provisions.

General Disclaimer

This Supplier Code of Conduct is in no way intended to conflict with the terms and conditions of any existing contract. In the event of a conflict, suppliers must first adhere to applicable laws and regulations, then the contract terms, followed by this Supplier Code of Conduct. However, if an obligation in this Supplier Code of Conduct is more explicit and stringent, this Supplier Code of Conduct will prevail.

Supplier Performance Obligations

Suppliers shall:

- Comply with their specific contractual obligations under their contracts with WPS Health Solutions;
- Conduct their business activities and employment practices in compliance with all applicable laws and regulations;
- Conduct themselves in a professional manner at all times while conducting business with and/or on behalf of WPS Health Solutions;
- Ensure all Supplier employees providing services to WPS Health Solutions pursuant to a federal government contract remain eligible to contract with the federal government or otherwise participate in a federal health care program;
- Follow and comply with the following provisions set forth:

  Health and Safety
  - Provide safe and humane working conditions for all employees and comply with all safety and health laws and applicable regulations.

  The Environment
  - Carry out operations with care for the environment and comply with all applicable environmental laws and regulations and international treaties.
  - Obtain, maintain, and keep current all required environmental permits and registrations and follow the operational and reporting requirements of such permits.
Information Protection

- Respect intellectual property rights, properly handle sensitive information, including confidential, proprietary, and personal information, and not use information for any purpose other than the business purpose for which it was provided, unless there is prior authorization from the owner of the information.

- Safeguard the confidential and proprietary information of others, including personal information, from unauthorized access, destruction, use, modification and disclosure, through appropriate physical and electronic security procedures.

Labor and Human Rights

- Encourage a diverse employee workforce and provide an employee workforce free from illegal discrimination or any other form of employment abuse.

- Commit to providing a harassment-free work environment by not tolerating actions, comments, inappropriate physical contact, sexual advances, or any other conduct that is intimidating, uncomfortable, or otherwise offensive or hostile.

- Treat employees fairly and honestly, including with respect to wages, working hours, and benefits consistent with all applicable laws and regulations.

- Comply with applicable local child labor laws and employ workers who meet the applicable minimum legal age requirement for their location. If the minimum age of employment is not defined, the minimum age of employment shall be 15 years of age.

- Never use forced or other unlawful labor in the supply of materials, products, or services. All employment must be strictly voluntary. Suppliers must respect the right of workers to associate freely as permitted by and in accordance with all applicable laws and regulations.

- Adhere to regulations prohibiting human trafficking and comply with all applicable local laws in the country or countries in which the Supplier operates. Refrain from violating the rights of others and address any adverse human rights impacts of the Supplier operations. Educate employees on prohibited trafficking activities and discipline employees found to have violated the law or rules. Specifically, Suppliers are prohibited from the following:
  - Destroying, concealing, or confiscating identity or immigration documents;
  - Using misleading or fraudulent tactics in recruiting;
  - Charging employee recruitment fees or providing inadequate housing based on local standards, laws, and directives;
  - Failing to provide employment contracts and other documentation in the employee’s native language;
  - Failing to provide return transportation upon the end of employment for employees brought to the country for the purpose of working on a U.S. government contract or subcontract; and
  - Failing to interview and protect employees suspected of being trafficking victims.
Ethics

- Comply with all applicable laws and regulations.
- Compete fairly for our business, without making or offering bribes or kickbacks, or giving anything of value to exert undue influence or secure an improper advantage.
- Keep and maintain accurate financial books and records in accordance with all applicable legal, regulatory, and fiscal requirements and with accepted accounting practices for the industry in which the Supplier operates and not conceal or misrepresent the underlying transaction represented by it.
- Deliver products and services meeting applicable quality and safety standards.
- Support compliance with this Code by establishing appropriate management monitoring and compliance processes and cooperating with reasonable assessment processes requested by WPS Health Solutions.
- Avoid all conflicts of interest or situations giving the appearance of a potential conflict of interest in the dealings with WPS Health Solutions. Notify WPS Health Solutions in the event that an actual or potential conflict of interest arises.
- Respect WPS Health Solutions employees’ duty to comply with WPS Health Solutions’ policies regarding business gifts and entertainment and conflicts of interest.

Monitoring

It is the responsibility and obligation of the Supplier to ensure its employees, agents, representatives, and subcontractors understand and comply with this Code. Suppliers are obligated to self-monitor their compliance with the provisions of this Code. Additionally, the Supplier is required to inform WPS Health Solutions when the Supplier is aware of a violation of this Code with respect to the products or services supplied to WPS Health Solutions. WPS Health Solutions reserves the right to verify compliance with this Code through internal and external assessment mechanisms.

Reporting of Questionable Behavior and/or Possible Violations

Suppliers are encouraged to maintain a reporting helpline or other reporting mechanism that allows for anonymous reporting of questionable behavior. Supplier will investigate such reports and take corrective action, if needed. If no such helpline or other reporting mechanism exists, Suppliers should report questionable behavior or a possible violation of this Code to our 24/7 confidential ethics helpline that is maintained by an independent service provider:

Phone: 866-293-2391
Website: ethicspoint.com

WPS Health Solutions will not tolerate any retribution or retaliation taken against any person who has, in good faith, reported questionable behavior or a possible violation of this Code.

Consequences for Violating This Code

In the event of a violation of any of the above expectations, WPS Health Solutions may pursue corrective action to remedy the situation. In the case of a violation of law or regulation, WPS Health Solutions may be required to report these violations to proper authorities. WPS Health Solutions reserves the right to termination our relationship with any supplier under the terms of the existing procurement/purchasing contract.

Online Version

This Code is available online at wpshealthsolutions.com. This Code may be updated and revised by WPS Health Solutions from time to time. Please refer to the above website for changes to this Code. Please contact WPS Health Solutions’ Corporate Compliance Officer at 608-977-8017 if the Supplier has any questions about its obligations under this Code or WPS Health Solutions’ enforcement of this Code.