

WPS Health Solutions Supplier Code of Conduct

Overall Standards

For over 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.

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;
- Follow and comply with the provisions set forth below:

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 prohibiting 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.

Health and Safety:

- Provide safe and humane working conditions for all employees.

The Environment:

- Carry out operations with care for the environment and comply with all applicable environmental laws and regulations.

Ethics:

- Comply with all applicable laws and regulations.
- Compete fairly for our business, without making or offering bribes, kickbacks or giving anything of value to secure an improper advantage.
- Keep 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.
- 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.
- 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.

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. 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:

Telephone: 1-866-293-2391

Web Site: www.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.

Online Version:

This Code is available online at: www.wpshealthsolutions.com. This Code may be updated and revised by WPS Health Solutions from time to time. Please refer to the above web site 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.

Approved By: WPS Board of Directors

Effective Date: July 30, 2009

Last Reviewed Date: June 27, 2019