

# Code of Business Conduct





## A message from our CEO



Thank you for reviewing LifeSecure's 2025 Code of Business Conduct and sharing our commitment to ethical and compliance-based business practices. Since LifeSecure's founding, these practices have helped us make a difference in the lives of our policyholders, develop innovative insurance solutions, and strengthen our reputation.

Our Code of Business Conduct is more than a set of rules. It sets our foundation of organizational integrity and promotes a culture of trust when we act ethically and responsibly. It also allows us to put our values into action and helps us make the right decisions every day.

Our individual and collective actions uphold and support our culture of organizational ethics which helps us serve our customers with integrity, respect our co-workers, seek guidance, and share concerns without fear. These principles will continue to support our strength and sustainability.

Sincerely,

Patrick J. Prichard  
President and CEO  
LifeSecure Insurance Company



## A message from our Compliance Officer



LifeSecure strives to maintain high ethical and compliance standards. Our Code of Business Conduct demonstrates our commitment to these standards and serves as a valuable guide to ethical decision making. It is up to each of us to support and promote an ethical culture, to use sound judgment, and to do the right thing.

Although we may formally review and acknowledge our company's Code of Business Conduct once per year, the policy and its message endure year-round. Please read the Code of Business Conduct carefully. If you have any questions concerning the Code, please speak to me, our Compliance staff, or any of our senior leadership.

Thank you for making ethics and compliance a priority.

Sincerely,

Brian Vestergaard  
Vice President  
Product & Marketing, Compliance Officer  
LifeSecure Insurance Company



## Compliance Leadership



### **Brian Vestergaard**

LifeSecure Vice President  
Product & Marketing, Compliance Officer



### **John Hyden**

LifeSecure Director  
Compliance & Corporate Governance, Privacy Official



### **Sharon Gipson**

BCBSM Senior Vice President  
General Auditor and Enterprise Compliance Officer



### **Kelly Lange**

BCBSM Vice President  
Enterprise Compliance, Privacy Official



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## STANDARDS OF BUSINESS CONDUCT

### 1. Scope

For purposes of this policy, “Company” means LifeSecure Insurance Company. Any reference in this policy to “Company” is intended to be a reference to this entity.

By board resolution, this policy applies to the Company Board of Directors, members of the director-selection councils and board committees.

The term “workforce member” refers to individuals who perform duties or render services for or on behalf of the Company regardless of the type of employment or contractual agreement, including, but not limited to full-time employees, part-time employees, temporary employees, contingent workers, volunteers, interns, contractors and consultants.

Vendors and independent contractors will be given a copy of the *Company Code of Business Conduct*. All are expected to comply with this policy.

#### 1.1 High ethical standards: The key to our success

Our *Code of Business Conduct* is part of the Company’s way of life. Ethics and compliance are related concepts, but not identical. Ethics are part of the culture of an organization. They provide a framework for decision making by guiding workforce members to always consider and do the “right thing.” This framework focuses on guiding workforce members on how and why to follow the rules.

Compliance is the requirement that workforce members abide by contractual obligations, LifeSecure standards, Company policies, and all applicable laws.

The Company requires those acting on its behalf to be respectful, fair, and courteous to each other and those affiliated with the Company. All workforce members are expected to conduct themselves in a respectful and businesslike manner in the workplace, during work-related activities, and in their dealings with co-workers, leadership and customers. The Company is committed to providing a safe working environment free of intimidation, retaliation, discrimination, threatening speech or behavior, threats of harm or violence, whether engaged in by another employee or third-party, such as vendors or volunteers.

This Code requires those acting on behalf of the Company to act with honesty, integrity, and impartiality when dealing with customers, vendors, regulators, competitors, community, fellow workforce members, and board and council members. Workforce members are expected to practice due diligence when selecting vendors and other third-parties. To earn and keep their trust, the Company makes every effort to avoid even the appearance of unethical or non-compliant conduct.

Leadership and the board of directors are committed to providing avenues through which ethical issues may be raised, reviewed, and resolved openly and honestly. Help is available when there are questions about how to maintain ethical standards. Anyone who is in a situation that raises an ethical concern should follow the guidelines in the **How We Solve Ethical Problems** section of this policy.

LifeSecure provides a different kind of insurance experience to create a better future for our customers.



## 2. Conflicts of Interest

Workforce members are to disclose any relationships, outside business dealings, and any other interests or activities that may conflict with the interests of the Company. Disclosures must be made any time a potential or actual conflict occurs throughout the year.

### 2.1 Identifying potential conflicts of interest

You have a duty to be entirely free from influence of any conflicting interests when representing the Company in business dealings or making recommendations that may influence an action of the Company.

The Company respects your privacy in personal activities and financial affairs. This code is intended to help you avoid situations that may represent a conflict of interest (COI).

The Company cannot foresee or define every situation that might be considered a conflict of interest. A conflict exists when an obligation or a situation resulting from your personal activities or financial affairs, or those of a close relative or cohabitant may influence their judgment in performing their duty to the Company. In some cases, an apparent conflict of interest is more theoretical than real, but it is important to disclose and resolve such cases promptly.

If you are not certain whether to report a potential conflict, contact Corporate Governance at **compliance@yourlifefsecure.com** for guidance.

Conditions in which potential conflicts of interest may arise include, but are not limited to:

**2.1.1 Financial interests** – A conflict may exist when a workforce member, directly or indirectly, or one of their relatives or cohabitants owns any beneficial interest in an organization which is a competitor of the Company or which has current or prospective business with the Company as a vendor, customer or contractor. A conflict is not likely to exist, however, where the financial interest

consists of stock holdings of under five percent in a publicly traded company.

**2.1.2 Outside work** – A conflict may exist when a workforce member engages in an independent business venture or performs work or services for another business, community, civic, or charitable organization to the extent that the activity prevents the workforce member from devoting the time and effort to the Company's business or impairs the workforce member's ability to act in the best interests of the Company.

A conflict may exist when a workforce member or one of their relatives or cohabitants serves in any capacity with an organization, including board participation, which is a competitor of the Company, or which has current or prospective business with the Company as a customer, vendor or contractor.

**2.1.3 Trading with the company** – A conflict may exist when a workforce member, or one of their relatives or cohabitants, is personally involved in a transaction with the Company for the provision or receipt of other goods or services.

An example of this kind of conflict would involve a transaction between an employee, or their relative or cohabitant, and the Company involving rental or purchase of real estate or other property, equipment or supplies.

**2.1.4 Confidential information** – A conflict may exist when a workforce member, as a result of their employment, obtains confidential information, PHI or PII for personal gain or to benefit others.

An example of this kind of conflict would be an employee, or their relative or cohabitant, uses the product pricing information obtained through work performed for LifeSecure to gain a competitive edge on the



## CONSIDER THIS

What may I accept? (reasonable vs. excessive)	
Customary and reasonable	Excessive
A raffle prize or random drawing that will not influence judgment	A personal gift such as an all-inclusive paid vacation
A fruit basket or basket of cookies	A case of champagne
Umbrella	Tickets to a distant sporting event, including airfare and/or hotel accommodations

advisory services they provide to others in the healthcare market outside of work.

**2.1.5 Business opportunities** – A conflict may exist when a workforce member, without knowledge and consent of the Company, assumes the benefit of any business venture, opportunity or potential opportunity from the course of their employment, and which is related to any current or prospective business of the Company.

An example of this kind of conflict is if an employee learns information about a third-party partner's anticipated financial performance through their oversight responsibilities and they decide to make a personal investment in the Company based on that information.

Using insider knowledge for personal gain or investment purposes is not allowed.

**2.1.6 Relatives or cohabitants** – A conflict may exist if a relative or cohabitant works for the enterprise, vendor, customer or competitor, depending on the reporting relationship or job functions performed. Likewise, a conflict of interest may exist when a workforce member processes claims payments for relatives or cohabitants who are subscribers or members of the Company.

**2.1.7 Gifts and entertainment** – A conflict may arise when a workforce member, or one of their relatives or cohabitants:

- Accepts a gift or entertainment from a person or organization that is a competitor, or that has current or prospective business

with the Company as a customer, vendor, agent or contractor.

- Where the acceptance, or the prospect of future gifts or entertainment, may limit the workforce member from acting solely in the best interests of the Company.

A "gift" or "entertainment" includes any gratuitous service, loan, discount, money, article of value or favor, but does not include loans from financial institutions on customary terms, articles of nominal value ordinarily used for sales promotion, ordinary business lunches, or reasonable entertainment consistent with local social and business custom, which may be part of your job duties and responsibilities.

The temporary receipt by a workforce member of a donation to a corporate sponsored charitable event shall not constitute the acceptance/receipt of a gift. Workforce members may not receive cash even if it is intended for a corporate sponsored charitable event but should encourage cash donations to be made directly to the charitable organization. For purposes of this section, corporate sponsored event is an event in which the Company is an official sponsor, one where a Company executive serves on the board as part of their corporate responsibilities, or an event that has been approved by management.

For more information on accepting gifts and entertainment, see section 2.4 on page 10 of this document.



## CONSIDER THIS

### Examples of Prohibited Relationships

1. Employee directly reports to their spouse or family member who is their manager or supervisor
2. Employee processes claims for their relative who is a member
3. Employee works directly with a supplier/vendor who is a family member
4. Employee has a reporting relationship with a significant other, or one with whom they are romantically involved.

### 2.18 Workforce members serving as Corporate Representatives on external boards

**Business organizations:** Company approval is required for specific workforce members to serve as a corporate representative on the board of a business organization. Annually, executive board service is reviewed by a subcommittee of the board of directors. Please refer to the *Corporate Citizenship Policy* for further information including instructions on how to obtain approval.

Corporate Representatives must submit an expense report to obtain reimbursement for expenses incurred to attend meetings.

Questions may be routed to Corporate Governance at [compliance@yourlifefsecure.com](mailto:compliance@yourlifefsecure.com).

Any expense reimbursement received from the business organization should be made payable to the Company and include documentation. Corporate representatives may not accept retainers, meeting fees, stipends, or any other compensation offered for service at these business organizations.

**Charitable, civic and community organizations:** Corporate Representatives may not accept retainers, meeting fees, stipends, or any other compensation when offered for service on these boards.

Anyone sitting on external boards in their individual capacity and not as a Corporate Representative of LifeSecure should see the *Conflicts of Interest – Outside Work* section for more information. Corporate Governance solicits external board participation disclosures from executives at least annually, and disclosures must be updated throughout the year, as necessary.

**2.1.9 Other** – Any other situation where a conflict may exist regardless of whether identified above.

### 2.2 Disclosing potential conflicts of interest

In addition to the annual formal statement, workforce members have a duty to disclose to their leadership, at the time it arises, any situation, transaction or relationship that may be viewed as a conflict of interest. Workforce members can amend their disclosure at any time by updating their last disclosure form on the compliance training website.

A link to the conflict of interest form is available on the corporate intranet site or email [compliance@yourlifefsecure.com](mailto:compliance@yourlifefsecure.com) for assistance.

### 2.3 Participation in conferences or meetings

You may not solicit customers, vendors, consultants, or agents to pay for the costs of travel, lodging, registration fees or other personal expenses related to conference or meeting attendance.

Cash honorariums or any other financial consideration received related to your position with the Company may not be accepted. Should any such payment be received, you must process it per the guidelines in the *Business Expense Reimbursement Policy*.

In most situations payment for travel-related expenses will be reimbursed by the Company in accordance with applicable Business Expense Reimbursement policy.

Attendance at or participation in conferences or meetings unrelated to current or potential Company business are not subject to this code.



If a current or potential customer, vendor, consultant or agent offers to pay for travel, lodging or registration fees associated with a meeting or conference, the recommendation is to decline the offer to avoid the appearance of an impropriety or potential conflict. Please keep these considerations in mind when attending a conference or meeting:

- Leadership approval must be obtained prior to attending the conference or meeting
- Your attendance must be for a valid business purpose and a reasonable adjunct to a business relationship
- Lodging and airfare may be considered excessive expenditures
- Expenses such as meals and entertainment paid by a vendor must be reasonable and consistent with the *Business Expense Reimbursement Policy*, e.g., cannot involve lavish accommodations or expenditures
- The expenses for attendance are reasonable considering the benefits afforded to the Company and unlikely to compromise your ability to carry out your duties
- The offer does not otherwise introduce the appearance of or an actual conflict of interest due to timing, current or prospective contract negotiations, or role/position of the employee being offered the accommodation

**Note:** Workforce members with responsibility for administration of Company workforce member benefit plans such as 401k plans, life insurance or workforce member health plans are subject to additional legal requirements. These workforce members (including their relatives) may not accept any gifts, gratuities or other considerations from a customer, vendor, consultant or agent about any transaction involving Company assets having an annual aggregate value of \$250 or more. Workforce members with these responsibilities may attend educational conferences related to workforce member benefit plans but shall be subject to the same guidelines as listed above.

## 2.4 Guidelines for acceptance and disclosure of gifts and entertainment

The following are guidelines for acceptance and disclosure of gifts:

- You may not accept any gift or entertainment that would influence your business judgment in favor of a workforce member, customer, vendor, consultant, agent or competitor.
- You are required to disclose receipt of any gifts or entertainment exceeding \$100 in value for a single gift, as well as multiple gifts from the same giver that exceed \$100 in total. You are encouraged to obtain leadership approval prior to accepting gifts or entertainment exceeding \$100 in value. Examples of gifts that are typically acceptable to receive include but are not limited to: a fruit basket, a raffle prize, or an umbrella.
- You may not give or receive monetary gifts or cash equivalents. Articles of nominal value ordinarily used for sales promotion may be exchanged. Also, the exchange of business courtesies, including reasonable meals and entertainment consistent with social and business custom is permissible. You should exercise good judgment in offering or accepting meals, entertainment or other gratuities to avoid any improper influence or the appearance of a conflict.
- When dealing with other individuals and entities whose standards are more restrictive than ours, we will follow their standards to the extent we are aware of them. Federal law prohibits gifts to federal workforce members, certain union leaders and to members of Congress, including any vendor, consultant, agent or government official affiliated with government health programs. We must follow the law as it applies to gifts to these individuals. No inducements may be offered to or accepted from state or federal government workforce members. No marketing gifts may be given to prospective government health program members valued at more than \$15.
- When in doubt as to whether gifts and entertainment are appropriate, consult your leadership or contact the Corporate Governance Director.
- Please refer to the *Business Expense Reimbursement Policy* for additional guidance.



## 3. Ethical Business Practices

### 3.1 Anti-bribery and anti-corruption

You should act with the highest ethical standards and are prohibited from engaging in criminal acts including any bribery and/or corruption. Corruption and Bribery are both state and federal crimes; engaging in unlawful acts creates risk for both the Company as well as you as an individual.

Corruption broadly means giving a benefit or advantage to someone contrary to the rights of others. Bribery, which is a type of corruption, is the offering, giving, receiving, or soliciting of any item of value to influence the actions of an official, or other person, in charge of a public or legal duty. Both bribery of government officials as well as private sector bribery is unlawful and prohibited. Participation in activity in violation of this statement will be subject to disciplinary action up to and including termination.

### 3.2 Accounting and reporting

To verify the integrity of Company financial and other records, everyone is required to abide by established accounting and business practices which include accurately and truthfully recording accounting data, corporate information, and operating data. False or artificial entries are not allowed for any reason in Company financial records.

Examples of improper conduct include:

- Causing records to appear as though a transaction occurred when it did not
- Causing records to appear as though a transaction occurred at a different time or for a different amount than it truly did
- Failing to report suspected financial fraud, waste, or abuse
- Fraudulently influencing, coercing, manipulating, or misleading any accountant/ auditor engaged in an audit of the financial statements of the Company

### 3.3 Political activities

The Company encourages you to be a good citizen and to participate in the political process. However, if you participate in political activities on your own initiative, including making personal political contributions to candidates or political parties, make it clear that you are acting as an individual and not acting on behalf of the Company. You may not use any Company property, facilities, or time of any other workforce member for any political activity. Involvement in political activities should be conducted outside of working hours.

Corporate political activity is highly restricted. The Company is prohibited by law from using its funds to support candidates for federal, state or local office. A narrow exception to this rule allows use of Company resources to form and maintain bluesPAC, a political action committee that may then make political contributions using voluntary donations from eligible workforce members.

### 3.4 Fair dealing

The Company is committed to dealing fairly with customers, vendors, competitors, and workforce members. We will not take unfair advantage of anyone through manipulation, concealment, abuse of privileged or confidential information, misrepresentation of facts, or any other unfair business practice.

### 3.5 Antitrust laws

The Company strives to conduct its business in a manner that helps maintain a free and competitive market. Antitrust laws help protect competition in the market. Avoid engaging in activities that contradict these laws and the Company philosophy.

Examples of transactions to avoid

- Entering into any agreement or joint conduct with competitors that would harm competition
- Collaborating with a competitor to decide what to charge for products or services

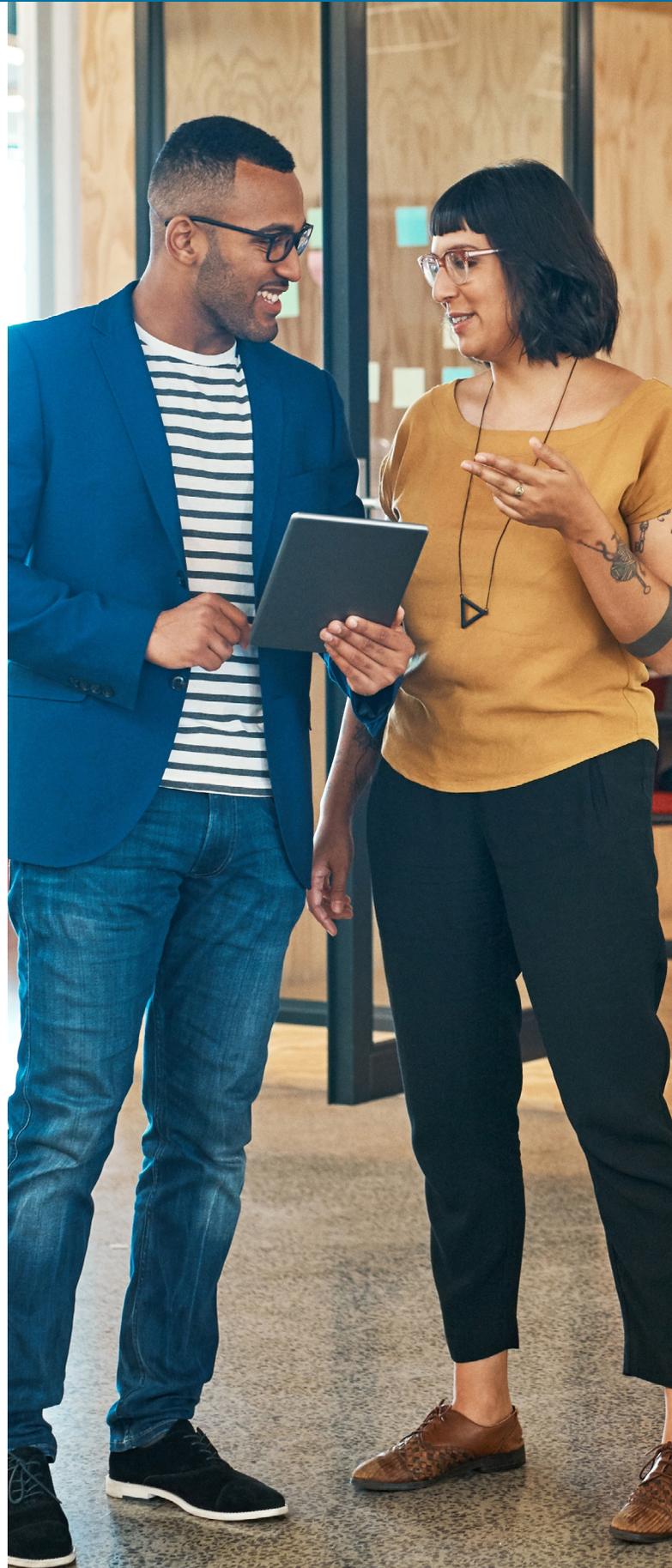


- Collaborating with a competitor to decide what to pay for services

To avoid any implication of an antitrust violation, Company workforce members should:

- Never discuss confidential information with a competitor
- Never exchange price information or communicate with a competitor about prices, anything that may affect prices, or customers
- Take extra care when attending trade association meetings or other events where interactions with competitors or customers may occur

Antitrust laws are very complex. Please reference the *Antitrust Policy* for additional information. Any questions about permissible or impermissible conduct should be directed to the Office of General Counsel at [OGCAntitrustQuestions@bcbsm.com](mailto:OGCAntitrustQuestions@bcbsm.com).





## 4. Protecting Corporate Assets

### 4.1 Confidentiality

The Company is required by state and federal law, and is strongly committed to, safeguarding the confidentiality of personal and protected health information. Such information includes, but is not limited to, a policyholder's medical history, treatment records, age or marital status. You may have access to this information only if you need it to perform your job. You may use and disclose it only as permitted or required by law and by our corporate Health Information *Privacy Policy* and/or consistent with the *Intellectual Property Policy*. Any violation of this obligation to maintain the confidentiality of protected health information will be viewed very seriously and will result in discipline, up to and including termination of employment.

You must vigorously safeguard the Company's confidential information. This information includes, but is not limited to, any information that is not generally disclosed outside the Company and that may be useful or helpful to our competitors.

Examples include financial data, source code, customer lists, business strategies, and information or data that we have agreed by contract to maintain confidentially. To protect this confidential information from improper disclosure, follow these guidelines:

- Share confidential information with others within the enterprise only on a need-to-know basis
- Do not transmit corporate information to personal emails or unauthorized external parties
- Do not use a workforce member-owned device to capture or disseminate images or audio of any corporate data
- Disclosure of any confidential information to outsiders must be approved by leadership and covered by a suitable confidentiality agreement
- Avoid incidental disclosures of confidential information in conversations with customers and others

All workforce members, regardless of work location, must follow Company confidentiality guidelines. Additional information can be found on the corporate intranet site.

You must also respect and protect the trade secrets and confidential information of other entities acquired prior to working for the Company. Confidential or protected information includes, but is not limited to the following:

- Customer lists
- Patented products, methods, or processes  
Copyrighted materials
- The trade or service marks of others

Questions regarding ownership issues and the use of confidential or protected information should be directed to Corporate Governance at **[compliance@yourlifefsecure.com](mailto:compliance@yourlifefsecure.com)**.

### 4.2 Use of company assets and funds

Company assets are to be used for reasonable and bona fide business purposes. Company assets include, but are not limited to:

- equipment funds
- office supplies concepts
- business strategies and plans financial data
- other information about Company business

These assets may not be used to derive personal gain for you or others. You must not transmit Company information to personal emails or unauthorized external parties. Workforce members shall refer to the Acceptable Use Standard for requirements and guidelines on the appropriate use of assets.

The Company should not directly or indirectly extend or maintain credit, arrange for the extension of credit, or renew an extension of credit in the form of a personal loan to or for any Director or Executive Officer (or equivalent thereof) of the Company.



### 4.3 Use of company e-mail and internet

The Company's internal e-mail systems are acceptable for transmitting confidential data within the enterprise. Protected health information may be shared using internal e-mail systems provided the recipient has a business need-to-know and the minimum necessary rule is applied.

Our internal electronic mail systems, however, are not secured sources of data transmission and should not be used to send e-mail over the public network unless appropriately encrypted.

Confidential information sent outside the Company must be encrypted. If messages are not encrypted, they could be accidentally misdirected or purposefully made public while being transmitted over the internet.

When sending confidential information outside the Company, you must comply with all applicable corporate policies, including the *Health Information Privacy Policy*, *Information Security Policy* and related corporate standards. You should avoid sending PHI, PII or confidential information by email outside of the Company whenever possible. Contact your leader or the Security Official with questions related to encrypted e-mail.

It is a violation of the Code of Business Conduct to use the Company's computer network or internal e-mail systems to create, access or share offensive, harassing, obscene, threatening, or disparaging information to others. Simply stated, do not send anything via the electronic mail systems that you would not want to be disclosed publicly. In addition, do not access such information using business computer systems.

### 4.4 Records management

The Company requires compliance with the *Records Management Policy* in accordance with applicable laws, establishes uniform procedures for storing, retaining, and destroying corporate records. Exceptions to the policies may be made by the Office of General Counsel during investigations of alleged wrongdoing or as required by law to preserve relevant corporate records.

### 4.5 Cybersecurity

The Company takes the role of cybersecurity very seriously, especially as it continues to support health care and other products. The Company leverages people, processes and technology to sustain the infrastructure. We require our workforce to speak up if we see an actual or potential cybersecurity issue and engage our internal cybersecurity experts as appropriate. You may also reference the Company's information security policies to understand how to protect assets and data from unauthorized access, disclosure, modification, or destruction.

### 4.6 Adherence to Fraud, Waste and Abuse guidelines

The Company is committed to preventing and detecting fraud, waste, and abuse. The Company promotes an ethical culture of compliance with all federal and state regulatory requirements and requires the reporting of any suspected fraud, waste, or abuse. The *Detection and Prevention of Fraud, Waste, and Abuse Policy* is available on the corporate intranet and sets forth the requirements.

### 4.7 Expectations for third-parties

The Company sets clear guidelines for those working with vendors and other third-parties to maintain strong levels of accountability and to deliver quality services to our members.

For information and guidance on working with vendors and other third-party entities, please reference the *Enterprise Procurement of Goods and Services and Vendor Management Policy* and the *Enterprise Vendor Management and Contract Administrator Policy* or contact Enterprise Procurement or the Office of General Counsel for specific inquiries.

Any compliance related inquiries can be directed to Corporate Governance at **[compliance@yourlifefsecure.com](mailto:compliance@yourlifefsecure.com)**.



## 5. We Value Our Relationships

### 5.1 Inclusion and Diversity in the workplace

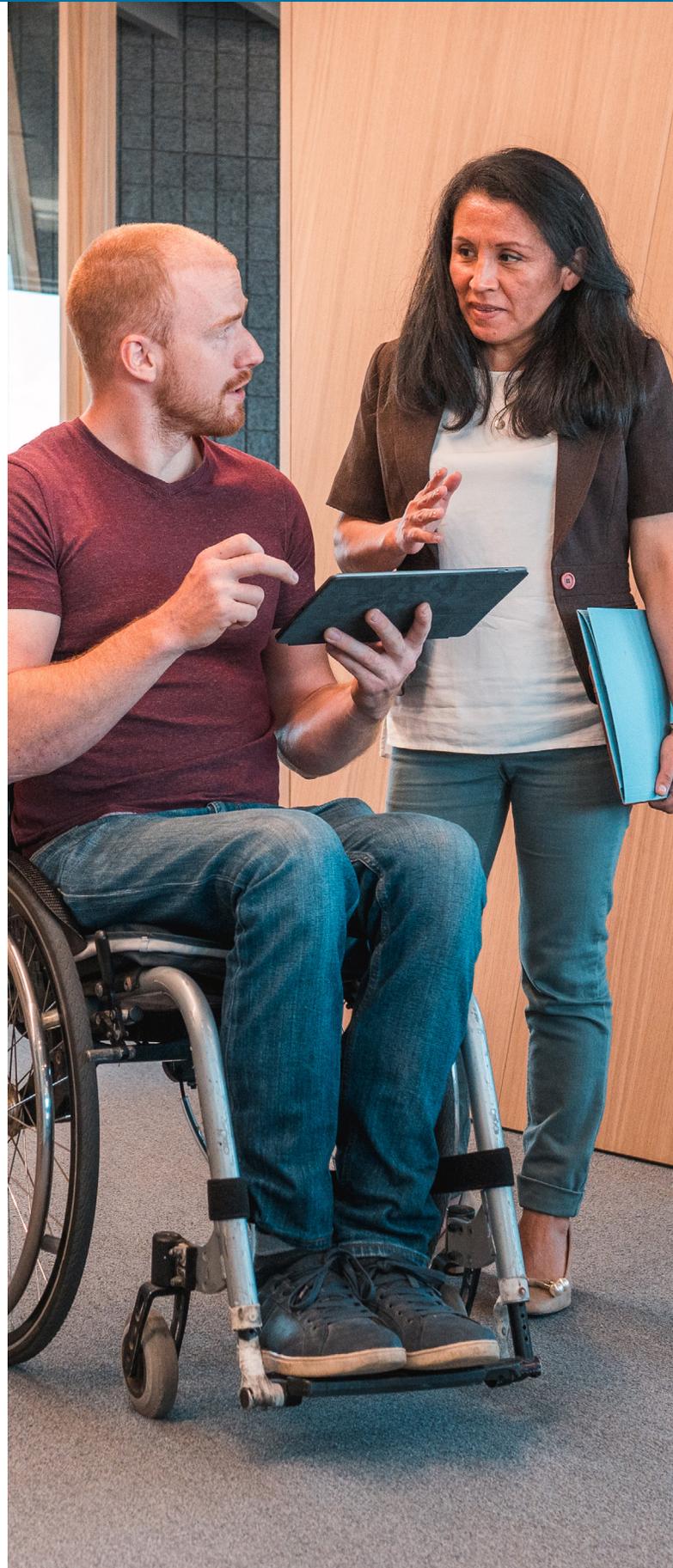
LifeSecure is committed to fostering, cultivating, and preserving a culture of inclusion, diversity, and equity. Creating awareness of different cultures, communities, generations, and work styles enhances our work environment and expands our awareness, where everyone, regardless of race, ethnicity, religion, age, seen or unseen disability, sexual orientation, gender identity, or veteran status, etc. can contribute at their highest levels. The focus on diversity and inclusion extends to vendors, community partners, and stakeholders.

Workforce members are expected to act in an inclusive, collaborative, and respectful manner at all times. Workforce members are encouraged to come together to learn, engage and serve as allies.

Please refer to the corporate *Equal Employment Opportunity Policy* or the *Anti-Harassment and Discrimination Policy* to learn more about company guidelines related to inclusion and diversity on the HR intranet site.

### 5.2 Equal employment opportunity

LifeSecure Insurance Company's policy of equal employment opportunity is to recruit, hire, promote, reassign, compensate and train for all job classifications without regard to sex, race, color, national origin, religion, disability status, protected activity, age, veteran status, height, weight, genetic information, gender identity, sexual orientation, marital status, familial status, citizenship, membership in a historically under-represented group, pregnancy, childbirth or a related medical condition. All employment decisions and personnel actions, including those relating to compensation, benefits, transfers, layoffs, Company-sponsored training and tuition assistance programs, shall be administered in accordance with the principal of equal employment opportunity. Additionally, on the same basis, all workforce members are encouraged to use LifeSecure facilities and participate in programs sponsored by LifeSecure.





### 5.3 Nondiscrimination

The Company strictly prohibits any form of harassment or discrimination against an individual or a group based upon sex, race, color, national origin, religion, physical or mental disability, protected activity, age, veteran status, height, weight, genetic information, gender identity, sexual orientation, marital status, familial status, citizenship, arrest record, membership in a historically under-represented group, pregnancy, childbirth or a related medical condition.

The term “harassment” includes, but is not limited to, bullying, offensive language, jokes, or other verbal, graphic, or physical conduct which would make a reasonable person experiencing such harassment or discrimination uncomfortable in the work environment, or which could interfere with the person’s job.

### 5.4 Prior criminal convictions

The Company has a legal duty to identify and consider for exclusion from its operations any workforce members whose prior conduct was illegal or inconsistent with the administration of an effective compliance and ethics program. How that conduct is related to the specific responsibilities of the workforce member, as well as how recently the conduct occurred will be considered when making hiring, contracting, or retention decisions.

Workforce members will be subject to periodic background checks and verification against government sanction lists. The Company will not do business with any individual or organization whose name appears on government sanction lists, as may be required by law, rule, or regulation. Disclosure requirements will be incorporated into applicable vendor and contractor agreements.

The Company’s Human Resources department makes decisions regarding the hiring or retention of workforce members with histories of:

- Felony convictions
- Convictions for crimes of fraud, dishonesty, or other health care crimes
- Reported or discovered misconduct

Issues regarding contracting with any organizations that have felony convictions or other misconduct will be discussed and resolved by the Corporate Governance Director.

### 5.5 Government investigations

If you are contacted at work or outside of work by a governmental agency concerning a work-related matter, you must immediately contact the Corporate Governance department.

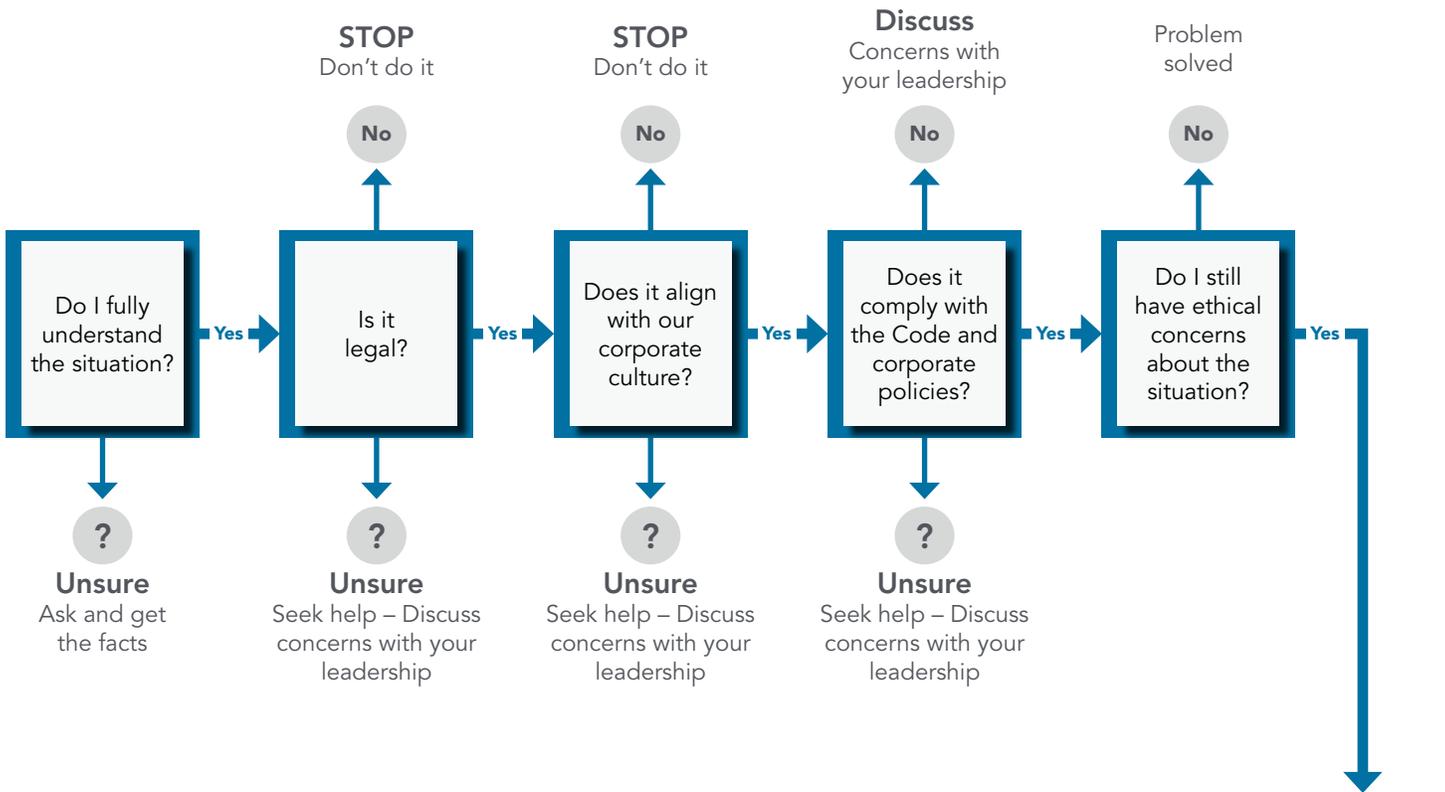
LifeSecure and the Office of General Counsel can aid in determining how to respond to the request for information. If you receive a subpoena from a government agency, you must immediately contact the Corporate Governance department at **[compliance@yourlifefsecure.com](mailto:compliance@yourlifefsecure.com)**.



# 6. How We Solve Ethical Problems

## 6.1 Ethical decision making guide

Some ethical issues have clear solutions. Other ethical questions are not as clear and present difficult choices. The *Code of Business Conduct* cannot list every potential dilemma; however, it can provide guidelines. If you are faced with an ethical problem, use the guide below as frequently as needed.



**Contact:**

1. Your leadership
2. Corporate Governance at [compliance@yourlifefsecure.com](mailto:compliance@yourlifefsecure.com)
3. Anonymous reporting can be made to **800-240-3050**
4. Or contact the:
  - Corporate Governance Director
  - Human Resources
  - Enterprise Compliance Officer
  - VP of Enterprise Compliance



## 6.2 Reporting and non-retaliation

We encourage you to think about ethical dilemmas, report problems or concerns, and ensure your behavior conforms to the standards in this Code.

Because you are encouraged to act as a good corporate citizen and raise issues about questionable activities, negative actions will not be taken against you for making a complaint or disclosing information about an activity that you believe in good faith may violate this Code or any laws, even if your belief is mistaken. Anyone who attempts to retaliate against you for reporting problems or concerns will be disciplined. The expectation is that you will feel free to demonstrate good faith reporting of compliance concerns without fear of retaliation or intimidation.

Any known or suspected violation of this Code or any laws need to be reported. You are obligated to immediately report instances of potential misconduct or non-compliance. Participation in internal and external investigations is required. Failure to report or cooperate in an investigation will subject you to discipline, including possible termination of employment.

## 6.3 How we respond to inquiries and reports involving the Code of Business Conduct and compliance issues

The Company is committed to creating a work environment that encourages and accepts inquiries and reports involving the Code of Business Conduct, suspected compliance issues, suspected violations of federal or state law, or suspected fraud, waste, or abuse. Anyone may report a compliance concern and reports may be made confidentially or anonymously.

We will review and investigate reports of potential violations as appropriate. If criminal conduct is confirmed, our response may include actions to mitigate any harm caused. Mitigating actions could include making appropriate restitutions and assessing the Company's compliance program to ensure the program is effective and consistent with applicable regulations.

If you are involved in a reported potential violation, you will be treated fairly and given an opportunity to explain your actions.

Remember that when you make an inquiry or report, it will be handled as confidentially and discreetly as possible, according to corporate policies. You will be notified once resolved, though the details of the resolution may be confidential. We may, however, be required to substantiate any allegations of wrongdoing. A record of your inquiry and our response will be made and forwarded to Human Resources, Corporate and Financial Investigations department (if related to fraud), or the Corporate Governance Director for review and follow-up as required.





## 7. Disciplinary Action for Violations

Appropriate disciplinary actions may be taken against any workforce member who:

- Violates the law
- Violates the *Code of Business Conduct* or *Corporate Ethics and Compliance Policy*
- Fails to report a violation of law, Code, or policy
- Fails to cooperate in internal or external investigations of alleged violations
- Fails to participate in required compliance training

Workforce members who fail to take reasonable steps to identify, prevent, discontinue and report misconduct as soon as it is suspected or discovered will be subject to discipline.

These behaviors are examples of situations that can lead to discipline and do not constitute an all-inclusive list of infractions. Each situation will be evaluated individually.

Appropriate disciplinary action may include termination and referral for criminal prosecution.





## 8. Definitions

**Abuse** – Activities that are inconsistent with sound fiscal, business or medical practices, that may result in unnecessary cost to the Company or its customers, including but not limited to payment for services not medically necessary or that fail to meet professionally recognized standards for health care.

**Bribery** – The offering, giving, receiving, or soliciting of any item of value to influence the actions of an official, or other person, in charge of a public or legal duty.

**Cohabitation** – Two persons living together as if married.

**Company** – LifeSecure Insurance Company (“LifeSecure”).

**Confidential Information** – Information not generally known or readily obtainable through legitimate means by persons outside the Company. For example, personal data about officers or employees, sales strategies, or information supplied in confidence by a customer or vendor may be confidential although not considered a trade secret.

**Corporate Representative** – A workforce member representing the Company as part of the fulfillment of the responsibilities of their role. Responsibilities generally include Company appointment to a charitable board or committee.

**Corruption** – Dishonest or fraudulent conduct that gives an unwarranted benefit or advantage to a person or entity.

**Fraud** – Intentional deception or misrepresentation made by a person or entity, including but not limited to workforce members, contractors, affiliated vendors, authorized agents, enrollees, members or other third persons with the knowledge that the deception could result in some unauthorized benefit to himself/herself or some other person or entity. It includes any act that constitutes fraud under applicable Federal or State law.

**Government Programs** – Includes Medicare, Medicaid, Federal Workforce Member Plan and Federal Workforce Member Health Benefit programs.

**HIPAA** – The Health Insurance Portability and Accountability Act of 1996 and its implementing regulations.

**Minimum Necessary Rule** – A key component of the HIPAA Privacy Rule requiring that the Company and its workforce members take reasonable precautions to only collect, use, and disclose the minimum amount of PHI needed to carry out a permissible business purpose or function.

**Personally Identifiable Information (PII)** – Any information that alone, or in combination with other information, identifies, or could reasonably identify, an individual and/or their relatives, employers, or household members. Not all PII is PHI. Information that is not obtained for medical purposes or as a result of health care operations is generally not PHI.

**Protected Health Information (PHI)** – Is individually identifiable health information, including demographic information collected from an individual, that is transmitted or maintained in electronic or any other form or medium, and:

- is created, or received by a health care provider, health plan, or health care clearing house; and
- relates to past, present, or future physical or mental health conditions of an individual; the provision of health care to the individual; or past, present, or future payment for health care to an individual, and
  - that identifies the individual; or
  - with respect to which there is a reasonable basis to believe the information can be used to identify the individual.

**Public Network** – A network that can be freely accessed by anyone, e.g., the Internet.



**Relative** – Family members, such as a spouse, parent, child, sibling, including step- relative and in-law. Family members also include domestic partners and any person who is part of your household.

**Waste** – Activities involving the Company’s payment or reimbursement, or attempts to receive payment or reimbursement, for items or services where there was no intent to deceive or misrepresent, but rather a state or federal program incurred unnecessary costs because of poor, inaccurate, or inefficient invoicing, billing, or processes.

**Workforce Members** – Individuals who perform duties or render services for or on behalf of the Company regardless of the type of employment or contractual agreement, including but not limited to full-time employees, part-time employees, temporary employees, contingent workers, volunteers, interns, contractors and consultants.





## 9. Contacts

If you see something, say something...

For guidance, issues, or concerns regarding:	Contact:
The Code of Business Conduct or General Compliance and Ethics	Email: <a href="mailto:compliance@yourlifefsecure.com">compliance@yourlifefsecure.com</a> Anonymous Hotline: 800-240-3050
Fraud, Waste, or Abuse	Email: <a href="mailto:compliance@yourlifefsecure.com">compliance@yourlifefsecure.com</a> Anonymous Hotline: 800-240-3050
Privacy concerns	Email: <a href="mailto:privacy@yourlifefsecure.com">privacy@yourlifefsecure.com</a> Anonymous Hotline: 800-240-3050
Antitrust concerns	Email: <a href="mailto:OGCAntitrustQuestions@bcbsm.com">OGCAntitrustQuestions@bcbsm.com</a> Anonymous Hotline: 844-STOP-FWA

Workforce members should feel free to raise ethical concerns in good faith without fear of retaliation or intimidation.

