Status **Active** PolicyStat ID **18986852**

Origination	1/24/2019	Owner	Jill Medley: Vice President, Compliance
Last Approved	9/26/2025	Area	Compliance
Effective	9/26/2025	Lines Of Business	Corporate
Last Revised	9/26/2025		
Next Review	9/26/2026		

Code of Conduct

The Health Plan Code of Conduct

The successful business operations and reputation of The Health Plan is built upon principles of fair dealing and ethical conduct of our employees. Our reputation for integrity and excellence requires careful observance of the spirit and letter of all applicable laws and regulations, as well as a scrupulous regard for the highest standards of conduct and personal integrity.

The continued success of The Health Plan is dependent upon our customers' trust and we are dedicated to preserving that trust. Employees and other persons acting on behalf of The Health Plan owe a duty to The Health Plan and its customers to act in a way that merits the continued trust and confidence of the public.

The Health Plan will comply with all applicable laws and regulations and expects its directors (i.e., board members), officers, employees, interns, volunteers, committee members, contractors, First Tier, Downstream, and Related Entities (FDRs), and Mountain Health Trust Subcontractors (Subcontractors) to conduct business in accordance with the letter, spirit, and intent of all relevant laws and regulations and to refrain from any illegal, dishonest, or unethical conduct.

Responsibilities of directors, officers, employees, interns, volunteers, committee members, contractors, FDRs, and Subcontractors include:

- Conform to all laws, rules, and regulations that apply to the business of The Health Plan wherever and whenever it is conducted.
- Conduct activities with integrity and honesty.
- Display good judgment and high ethical standards in business dealings. All of The Health Plan's business affairs must be conducted with honesty, fairness, and integrity. These qualities are evidenced by truthfulness and the absence of deception or fraud.
- Avoid any practice that involves questionable payments, improper billing practices, improper physician arrangements, or potential fraud, waste, and abuse.
- Not knowingly create, maintain, or submit records, reports, or statements that are inaccurate, false, or misleading. All items of income and expense and all assets and liabilities must be entered into the financial records and be accurately described. No undisclosed or unrecorded funds may be established. All reports submitted to governmental authorities must be accurate and complete and all transactions must be executed in accordance with management's authorization.

- Not disclose confidential information to unauthorized persons. Anyone acting for, or on behalf of, The Health Plan must not use confidential information in a way that is not consistent with The Health Plan's policies, procedures, and applicable law. Confidential information must not be given to competitors, suppliers, contractors, or to other employees who do not have a legitimate need to know the information.
- Not access, use, or disclose confidential information related to The Health Plan's members, including information identified as protected health information under the Health Insurance Portability and Accountability Act, unless such access, use, or disclosure is permitted by law and consistent with The Health Plan's policies and procedures including minimum necessary requirements..
- Not participate in activities that could conflict, or appear to conflict, with responsibilities to The Health Plan. Employees, directors, officers, and committee members may not realize any profit or gain, other than normal compensation, as a result of their position with The Health Plan. A conflict of interest occurs if activities or responsibilities are detrimental to the interest of The Health Plan or result in improper or illegal personal gain.
- No employees, directors, officers, or committee members of The Health Plan, or any member of their family, is permitted to receive gifts, loans, or other special preferences from a person or organization that does, or wants to do business with, The Health Plan or is a competitor of The Health Plan. This prohibition excepts gifts of limited value extended as an ordinary business courtesy.
- Not provide gifts, loans, or other benefits to a provider, potential member, or client to obtain referrals or beneficial arrangements or as an inducement to enroll with The Health Plan.
- Gifts to physicians, clients, members, or potential members are appropriate only if the monetary value is modest, the benefit is part of marketing, educational, or other ordinary business activity, and the benefit does not violate any applicable laws or regulations. Occasional business meals or entertainment events are acceptable provided they are of reasonable cost and the business purpose is clearly documented. The cost of such items shall not exceed the values set forth in any applicable regulation or policy.
- Not use The Health Plan's funds for improper or illegal activities. There will be no payments to government officials to secure sales or obtain favorable treatment. Gifts to, or entertainment of, government officials or government employees are prohibited because such actions could be construed as attempts to influence government decisions.
- Report any suspicious, illegal, or unethical activities or possible conflicts of interest to the Compliance Officer.
- Self-report any charges of, or conviction of, any criminal offense.
- Self-report if listed by a federal agency as debarred, excluded, or otherwise ineligible for participation in federally funded health programs.
- Complete all required trainings annually and within 90 days of hire or appointment, unless otherwise noted.

In general, the use of good judgment, based on high ethical principles, will guide you with respect to lines of acceptable conduct. If a situation arises where it is difficult to determine the proper course of action, the matter should be discussed openly with your immediate supervisor, the Human Resources Department, or the Compliance Officer.

The Health Plan ensures that all directors, officers, employees, interns, volunteers, committee members, contractors, FDRs, and Subcontractors may report, or assist in the investigation of, suspected illegal acts or improper conduct without threat of negative consequences.

- No retaliation, reprisals, or disciplinary actions will be taken or permitted against The Health Plan's directors, officers, employees, interns, volunteers, committee members, contractors, FDRs, or Subcontractors for the good faith participation in The Health Plan's compliance program, including but not limited to reporting potential issues to the appropriate authorities, cooperating in an investigation of suspected illegal activities or improper conduct, and conducting self-evaluations, audits, and remedial actions.

- Failure to abide by this prohibition against retaliation or reprisal is a violation of this Code of Conduct, and may be a violation of federal and/or state law (e.g., False Claims Act, Deficit Reduction Act of 2005).

Compliance with this Code of Conduct is the responsibility of all The Health Plan's directors, officers, employees, interns, volunteers, committee members, contractors, FDRs, and Subcontractors. Failure to comply with this Code of Conduct may lead to disciplinary action, up to and including termination of employment or contract.

Each director, officer, employee, intern, and volunteer is required to read and acknowledge this Code of Conduct on an annual basis by way of the certification statement below.

Attestation:

I hereby certify that:

I have read, understand, and agree to abide by The Health Plan's Code of Conduct.

I have not been convicted of, or charged with, a criminal offense, nor have I been listed by a federal agency as debarred, excluded, or otherwise ineligible for participation in federally funded health programs.

I agree to report suspected violations of any applicable federal and/or state laws, regulations, this Code of Conduct, or The Health Plan's Corporate Compliance Plan to my supervisor or the Compliance Department. I understand that any violation of any applicable federal and/or state laws, regulations, the Code of Conduct, the Corporate Compliance Plan, or any other The Health Plan compliance policy or procedure is grounds for disciplinary action, up to and including termination of employment or arrangement with The Health Plan.

Unless otherwise noted in the space immediately below, I am not aware of any violations of any applicable Federal and/or State laws, regulations, the Code of Conduct, or the Corporate Compliance Plan.

Name (print):	
Date:	
Signature:	
Comments (if applicable):	

Remarks:

Approved by The Health Plan's Board of Directors on September 26, 2024**.**

All Revision Dates

9/26/2025, 9/30/2024, 9/29/2023, 9/29/2022, 6/18/2021, 7/20/2020, 9/27/2019, 1/24/2019

Approval Signatures

Step Description	Approver	Date

EMT Approval	Jeff Knight: President & CEO	9/26/2025
	Jill Medley: Vice President, Compliance	9/25/2025
	Jill Medley: Vice President, Compliance	9/25/2025