

CODE OF CONDUCT

Community Health Network Of Connecticut (CHNCT) has created this Code of Conduct to define the general principles for ethics and conduct to which every employee will be expected to follow. Each employee is expected to follow all company policies and procedures, as well as all laws and regulations that apply to our business. Violations of the law or company policies will result in corrective action, which may include disciplinary measures. Since it is not possible to address specifically all possible topics or circumstances, CHNCT reserves the right to respond to any specific situation in whatever manner it determines appropriate to resolve such situation. Employees with questions about this Code of Conduct, or those who wish to discuss specific situations to ensure they are in compliance, should contact their Manager.

OUR MISSION

CHNCT is committed to ensuring the highest quality of healthcare delivery to our members. We pledge each member will be serviced with the highest level of respect, dignity, and professional integrity. In partnership with our providers and community health centers, we will continually seek to improve the health status and well being of our members and their families who have entrusted us with their care.

In our work environment, we consider our employees to be our strongest resource. We promote teamwork and excellence in all areas of our business, with a focus on quality improvement. Through strong leadership and perseverance, our company will continue to grow and prosper.

STANDARDS

Compliance with Law

- CHNCT expects all employees to comply with all federal, state and local laws and regulations that apply to our business.
- Further, any violation of law occurring in our workplace or anywhere CHNCT business is conducted, or outside of work in circumstances that may negatively impact CHNCT, may result in disciplinary action as determined by CHNCT in its discretion.

Confidentiality and Privacy

- The nature of our business provides that employees have access to sensitive information in some form on a daily basis.
- All information handled by employees regarding members, providers, fellow employees and other proprietary business information will be kept confidential, including written or electronic communications and verbal conversations.
- Employees will take precautions when discussing confidential information in social settings, copying confidential documents, and delegating work that may contain confidential information.

Protected Health Information

- Protected Health Information is individually identifiable health information (including demographic information) that has been transmitted or maintained either on paper, electronically or in conversations. It is created or received by certain participants in the health care industry, relates to the health of an individual or payment for health services and either identifies the individual or provides a reasonable basis to believe the information can identify the individual.
- CHNCT members generally have access to their own protected health information. Employees will refer to CHNCT privacy policies for further guidance and should not hesitate to speak to their supervisor or Compliance staff whenever they have a question or concern that the CHNCT privacy policies do not appear to answer.
- When conducting business outside our company, employees will only disclose a member's protected health information (such as claims data or medical records) to authorized parties for normal business operations.
- Employees will not disclose protected health information outside of normal business operations or what is permitted according to CHNCT privacy policies without a written authorization signed by the member.
- Employees will only have access to the minimum amount of protected health information necessary to perform his or her job.

Proprietary Business Information

- Employees will not disclose CHNCT confidential or proprietary business information to unauthorized outside parties (such as competitors).
- Confidential business information includes, but is not limited to, the following:
 - Financial information
 - Marketing strategies
 - New materials research
 - Pending projects and proposals
 - Technological data
 - Employee information
 - Proprietary materials developed for CHNCT members or providers

Security Measures

- CHNCT has taken measures to protect our physical location, as well as the confidential data stored in our systems.
- Employees will keep all forms of access (including security codes and keys) to our building confidential.

- System IDs are provided to each authorized employee, which allow the employee access to only those programs necessary to perform the responsibilities of their position.
- When passwords are required in order to log in to a system, employees will keep this information confidential.
- Employees will not share their personal system user IDs and passwords with any internal employees or external parties other than an authorized CHNCT Management Information Systems representative.

Discarding Confidential Documents

- When discarding documents that are no longer needed or required to be retained, employees will be expected to shred anything that contains confidential information.

Work Environment

- CHNCT strives to maintain a work environment where all employees are treated fairly with honesty, dignity and respect.
- The same standards will apply to our treatment of all outside business relationships, including members, providers, subcontractors, vendors and government officials.
- All employees have the right to a healthy and safe work setting.
- In our work environment, we will not tolerate unsafe, unlawful or inappropriate behavior or breaches of our workplace policies, including but not limited to the following examples:
 - Any form of discrimination, including but not limited to age, race, gender, disability, ethnic or national origin, ancestry, religion, marital status or sexual preference;
 - Sexual harassment, including inappropriate sexual advances, comments, actions or any other inappropriate behavior (Please refer to the full sexual harassment policy for more information, including how to report possible sexual harassment to CHNCT for investigation);
 - Offensive, threatening or violent behavior;
 - Possession or use of dangerous weapons on CHNCT property or at CHNCT sponsored events, regardless of any lawful license/ permit that would allow an individual to possess a dangerous weapon in other circumstances;
 - The use, sale, purchase or possession of alcohol, illegal drugs or paraphernalia while conducting CHNCT business in any location; and
 - Theft or misappropriation of CHNCT property, or a co-worker's property.

Accuracy of Information

- Employees must not falsify any document concerning CHNCT's business, its employees, members, providers, subcontractors, vendors, government officials or the employee, including but not limited to, applications for employment, supporting documentation such as resumes, time sheets and expense reports.

- Falsification of a document includes, but is not limited to, the affirmative inclusion of false or misleading information or the omission of facts of information that results in falsification of a document.
- Further, employees may not make statements that misrepresent facts or information concerning CHNCT business, its members, employees, providers, subcontractors, vendors, government officials or the employee.
- Misrepresentation includes, but is not limited to, actual statements that are false or misleading, or the omission of facts or information that results in a false or misleading impression or implication.

<i>Conflicts of Interest</i>

- Employees have an obligation to conduct business within guidelines that prohibit actual or potential conflicts of interest.
- An actual or potential conflict of interest occurs when an employee is in a position to influence a decision that may result in personal gain for that employee or for a relative as a result of CHNCT's business dealings.
- Employees may not accept kickbacks, bribes, substantial gifts or special considerations as a result of any transaction or business dealings involving CHNCT.
- This does not include reasonable entertainment or meals offered or received by employees as part of legitimate business dealings.
- Employees may contact the Director of Government Affairs and Compliance to discuss any situation, which might result in an actual or potential conflict of interest.
- Business dealings with outside firms should not result in unusual gains for those firms, the employee (including the employee's relatives) or both.
- Unusual gain refers to bribes, product bonuses, special fringe benefits, unusual price breaks and other windfalls designed to ultimately benefit the company, the employee or both.

Limitations on Gifts

- Employees may only give and accept gifts from outside parties if they are of nominal monetary value and are considered normal business courtesies.
- Employees are permitted to accept a gift valued at no more than \$50 from one entity per calendar year.
- Employees are not permitted to give or accept monetary gifts of any sum.

Political Contributions

- CHNCT is prohibited by Connecticut law from making contributions to, or making expenditures for the benefit of, any candidate's campaign for election to public office or for nomination at a primary for any such office, or to promote or defeat any candidate for any such office, or to promote the success or defeat of any political party.
- This law applies to all public officials, except candidates and campaigns for the President, United States Senators and members of Congress.

- The law defines a “contribution” as any gift, subscription, advance, payment or deposit of money or anything of value, made for the purpose of influencing the nomination for election, or election, of any person.
- Employees may make personal political contributions or expenditures within the limits established by applicable law but may not be reimbursed or compensated for any such contributions or expenditures by CHNCT or any of its affiliates.

Lobbying

- Employees who are engaged in lobbying are required to register and file financial reports with the State Ethics Commission unless his or her lobbying activities are less than five hours in a calendar year or are limited to formal appearances before public sessions of legislative committees or public hearings of state agencies to give testimony and he or she registers his or her appearances in the record of such committees or agencies.
- The Connecticut Code of Ethics for Lobbyists defines “lobbying” as any communication with an official or his or her staff in the legislative or executive branches of state government, including quasi-public agencies, for the purpose of influencing legislative or administrative action.

Conflict of Interest Disclosure Statement

- Employees will receive a Conflict of Interest Disclosure Statement annually for signature.
- The purpose of this Statement is to disclose to CHNCT if you are involved in certain activities that may be considered a conflict of interest.
- If employees have any questions concerning a possible conflict of interest or activities they are involved in that CHNCT may consider disclosable, employees should speak with their supervisor or Compliance staff at the earliest opportunity.

Company Assets

- Corporate assets, including funds, supplies, equipment (such as computers), company motor vehicles and information are to be utilized for business related purposes only.
- Employees will not use company assets for personal financial gain unrelated to CHNCT business.
- During employee work time, employees shall not conduct personal outside business or volunteer work unrelated to CHNCT business.
- Employees shall not make unauthorized copies of CHNCT computer software programs for personal use.
- All other personal uses of company resources must be approved in advance by your Manager.

Antitrust

- The policy of CHNCT is to conduct its activities in compliance with all applicable federal and state antitrust laws.

- These laws prohibit such conduct as price fixing, group boycotts, allocation of markets, collusive agreements or understandings among competitors, attempts to exclude competition from certain markets and any other artificial restraints on competition.
- Antitrust violations can result in severe penalties, so it is vital that CHNCT employees notify the President/ Chief Executive Officer of CHNCT when they suspect a potential antitrust problem related to the performance of their duties for CHNCT.
- All CHNCT employees shall adhere to the following standards of conduct in connection with the performance of their duties:
 - CHNCT employees shall not engage in any collaborative marketing or contract negotiations with other managed care organizations unless otherwise approved by CHNCT’s Board of Directors.
 - No CHNCT employee may discuss or communicate with any competitor concerning payment rates, pricing policies, plans to offer or eliminate particular services or other competitively sensitive information. Surveys and questionnaires from professional associations or other third parties requesting any competitively sensitive information must be submitted to the President/ Chief Executive Officer of CHNCT for review prior to responding.
 - No CHNCT employee may enter into any agreement or arrangement with a competitor to (a) allocate members, markets or territories; or (b) boycott or refuse to deal with any other person. This includes not only a formal written or oral agreement, but also a “gentlemen’s agreement” or “understanding.”

REPORTING POSSIBLE MISCONDUCT

- Employees who become aware of a possible compliance issue have an affirmative obligation to report it to either a Manager or through one of the Compliance reporting systems:
 - **Compliance Hotline:** Employees may telephone CHNCT’s toll-free Compliance Hotline at **1-800-826-6762**, 24 hours a day, 7 days a week to report possible compliance issues. CHNCT contracts with an external entity to take all Compliance Hotline calls.
 - **Open-Door Policy:** Employees may contact the Director of Government Affairs and Compliance at any time to discuss possible compliance issues.
- Employees do not need to identify themselves if they wish to remain anonymous.

Employee Retaliation

- CHNCT employees shall not be subject to retaliation or harassment in any form as a result of reporting possible misconduct or non-compliant behavior or participating in an investigation of misconduct in good faith.
- Any supervisor, manager or employee who is found to have engaged in retaliation or harassment against another employee who has reported misconduct or participated in an investigation will be subject to disciplinary action up to and including dismissal on the first offense.

VIOLATION OF THE CODE OF CONDUCT

- CHNCT employees have a personal responsibility to report any instance that goes against the Code of Conduct.
- All reports will be fully investigated. If an investigation validates a reported violation, the appropriate course of corrective action will be taken.
- Depending on the nature and severity of the violation, any or all of the following actions may be taken by CHNCT:
 - Verbal Reminder
 - Written Warning
 - Decision-Making Leave
 - Discharge
- There are certain misconducts, which CHNCT will have zero tolerance for and may result in immediate discharge.

CONCLUSION

- This Code of Conduct reflects CHNCT's commitment to conducting business in an ethical and legal manner.
- This document is not meant to replace detailed company policies and procedures or act as an Employment Agreement; it is meant to provide guidance for the conduct expected of all CHNCT employees.
- Employees have an obligation to report non-compliant or unethical behavior through one of the channels described in the section "Reporting Possible Misconduct."
- **Employees who are unsure whether an action or involvement on their part constitutes a Code of Conduct violation should contact their Manager, Human Resources or the Director of Government Affairs and Compliance for more information.**
- CHNCT reserves the right to modify this Code of Conduct or any corporate policy as necessary. Employees will be provided with all revisions.

All employees are required to sign the statement below acknowledging they understand and agree to abide by all standards in CHNCT's Code of Conduct during their term of employment.

I have read CHNCT's Code of Conduct and understand it represents the organization's mandatory policies and procedures for ethical behavior. By signing this document, I agree to abide by all standards as described in CHNCT's Code of Conduct.

Signature

Printed Name

Position

Department

Date