



Care N' Care Insurance Company
Of North Carolina, Inc.
d/b/a HealthTeam Advantage

Code of Conduct

V.3 December 2018



HealthTeam Advantage knows that participation in any business is a tremendous responsibility and requires trust with our partners. The healthcare industry is highly regulated, and the laws and rules can be very complex. We are focused on ensuring we remain a company that others want to do business with, now and for many years to come.

We are committed to conducting ourselves with the highest regard for professional responsibility, integrity, and regulatory compliance, and our Code of Conduct is the document that helps guide us through what this means on a daily basis. Our commitment to compliance and conducting business in a principled manner gives a competitive advantage in the marketplace.

The Code of Conduct explains our responsibility for conducting business ethically. I encourage you to read this important information and use these resources to help you make ethical choices in your day-to-day business activities.

If at any time you are not sure of the correct decision, please reach out to your supervisor, manager, or leadership; they will help guide you in making ethical decisions.

Please join us as we all pledge to keep ethics, integrity, and compliance central to the way we do business.

Sincerely,

Brendan Hodges

Brendan Hodges
President
HealthTeam Advantage

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Conducting Business with Integrity

Care N' Care Insurance Company of North Carolina, Inc. d/b/a HealthTeam Advantage (the Company) is committed to conducting business with integrity and in compliance with all applicable laws and regulations. Success depends on each of us making and keeping this commitment and helping ensure that all of our stakeholders obtain the best from each of us now and in the future. As an organization that primarily conducts business with the federal government, the Company is obligated to comply with requirements outlined in 42 C.F.R. § 422.503 and §423.504. Conducting ourselves and our business with integrity will strengthen our compliance program helping to make it a core competency and a competitive advantage.

Our Code of Conduct is available electronically on our corporate website at www.healthteamadvantage.com, www.hta.ethicspoint.com or hard copy by contacting the Compliance and Integrity Department and governs the conduct of all employees, members of the Board of Directors (when acting on behalf of the Company), first tier, downstream and related entities (FDRs), contractor, and all agents of the Company.

This policy may be supplemented by parent Company policies and procedures as needed. Policies and procedures may be found on www.healthteamadvantage.com/compliance-integrity/. Staff can access the Employee Handbook on the company intranet at: HealthTeam Advantage–Shred–Documents/Policies and Procedures. (See: *HealthTeam Advantage Employee Handbook, September 2017*).

Corrective Action

The Company's Corrective Action policy applies to issues of compliance misconduct. A violation of the Code of Conduct, Company Policies and Procedures, the law, or regulations may result in corrective action, including but not limited to termination of employment. If an employee's work falls below acceptable Company standards, or you do not follow the Company rules, policies or procedures, you may be subject to disciplinary action. This disciplinary action may be in the form disciplinary warning steps or termination. The Company may choose to take one or more of these steps as necessary and may skip one or more steps progressing to immediate termination when it feels that circumstances warrant. The level of corrective action will depend on factors such as the nature and severity of the issue and may result in any of the following levels of corrective action:

- Verbal Warning/Reprimand
- Written Warning
- Final Written Warning
- Involuntary Termination

Unethical or illegal behavior that could impact our government business may subject the Company to governmental corrective actions. Corrective actions may include civil money penalties, sanctions such as suspension of enrollment, or formal notices of non-compliance. (See: *HealthTeam Advantage Employee Handbook, September 2017, and SOP 1.00.80 Compliance Oversight and Audit Process, April 2018*).

Decision Making Framework

We are often faced with decisions involving integrity. When we are, it is helpful to have a framework to guide us through the potential issue. Here are some questions to help guide you.

1. What is the potential issue and is it illegal or against the Company's policies and procedures?
2. Who might be affected by the actions and how might they be impacted? This includes you, our stakeholders, and the Company.
3. How might the potential issue affect me, the stakeholders and the Company?
4. Are the potential issues aligned with your personal ethics?

Asking Questions and Reporting

Anytime you have a question about Compliance and Ethics or if you suspect a potential compliance issue, have a conversation with your supervisor. If it is more comfortable, you may contact the Compliance and Integrity Department Helpline at 855.741.4518, visit www.hta.ethicspoint.com, or you can send a note or letter to:

Attention: Thomas Wilson, HealthTeam Advantage
Chief Compliance Officer 7800 McCloud Road, Suite
#100 Greensboro, North Carolina 27409

These options allow you to submit your question or potential issue anonymously.

When asking questions or reporting potential issues, it's always a good idea to have your facts organized and provide as much detail as possible. This helps to ensure a more thorough review.

Investigation Process

All reports of potential or actual unethical behavior or non-compliance is immediately reviewed, and subsequent investigative action taken as appropriate. During the course of the investigation, the Compliance and Integrity Department may seek assistance from other areas (e.g. human resources, audit, legal) to help ensure the investigation is conducted thoroughly and that any corrective and/or disciplinary action taken is consistent with the Company's corrective action policies and procedures. Each of us is expected to cooperate fully with any investigation and keep it confidential. The compliance officer has an "open-door" policy where anyone can bring forth a good-faith issue that will be treated in confidence.

Non-Retaliation

In many instances, the Company relies on you to report in good-faith potential issues of compliance. The Company will not tolerate any retaliation, intimidation, discrimination, or other adverse actions when you are reporting potential issues. If you suspect or observe retribution or retaliation, report it immediately to your supervisor or the Compliance and Integrity Department at: 855-741-4518.

Remember, knowingly and intentionally making false reports will also not be tolerated and will be subject to corrective action. (See: *HealthTeam Advantage Employee Handbook, September 2017*)

Safe Workplace

All employees are expected to conduct themselves in a manner that promotes a safe cooperative, and professional environment and prevent disruptive behavior. You are expected to treat others with respect. The Company will not tolerate any harassment, abuse, intimidation or other retaliation. (See: *HealthTeam Advantage Employee Handbook, September 2017*).

Identification

One of the ways we can help keep our environment safe is to display our badges while at work and also be aware of anyone who is not wearing one. Access to Company facilities and restricted areas requires employees to show or scan their badge. Badges should be worn above the waist at all times while on Company property. If you notice someone that does not have a badge, ask them if they need assistance and if needed, escort them to the reception office and do not allow them into operational areas of the company. If at any time, you observe any activity that violates the law or company policy, contact your supervisor or building security immediately. (See: *HealthTeam Advantage Employee Handbook, September 2017*).

Workplace Violence

The Company prohibits any disruptive, abusive, offensive, or impaired behavior. Prohibited conduct includes, but is not limited to:

- Inappropriate verbal communications, including profane, intimidating, or disrespectful language;
- Demeaning or condescending behavior or, including condescending intonation, verbal abuse, or name-calling;
- Failure to adhere to organizational policies;
- Inappropriate physical contact, verbal outbursts and physical threats;
- Unlawful workplace discrimination and harassment;
- Sexual harassment;
- Retaliation;
- Drug and Alcohol;
- Violence in the workplace

(See: *HealthTeam Advantage Employee Handbook, September 2017*).

Weapons

Weapons, concealed or otherwise, are forbidden on Company property with the exception of on-duty and off-duty, sworn law enforcement officers with federal, state, or local jurisdiction, Armed Company/Private Police (i.e., Lankford Company Police), or an Armed Transport Service (i.e., Loomis, Wells Fargo). If you encounter anyone who has a weapon in their possession, you should immediately notify the building security.

Drug and Alcohol Use

The Company strives to maintain a safe, healthy, and efficient working environment. The unauthorized or unlawful use, possession, sharing, sale, purchase, manufacture, distribution, transportation or diversion of controlled substances by employees of the Company leads to safety and health risks, not only for themselves, but for others, and is prohibited. Reporting to work or being on duty (including break times and scheduled on-call time) while under the influence of alcohol or illegal drugs is prohibited. If you suspect someone is impaired, notify your supervisor, Human Resources or the Compliance and Integrity Office. The Company has an Employee Assistance Program in place to help employees who may have a substance abuse problem.

Integrity in the Work Place

Demonstrating integrity in the work place means making the best possible decision! You must be aware of the situation, careful to safeguard member and company information, avoid potential conflicts, use company property appropriately, ensure accurate and complete recordkeeping, and doing everything we can to keep a healthy and safe work place.

Conflict of Interest

Employees shall conduct their personal and professional relationships, including interactions with third party vendors, in such a way as to assure themselves, the Company and the community that decisions made are in the best interest of the Company without the slightest implication of wrong doing. The exercise of judgment is required to determine if a potential conflict of interest situation exists.

A conflict of interest exists when an employee is in a position to profit directly or indirectly through the application of their authority or knowledge. Also, a conflict of interest exists if a friend or relative benefits or the Company is adversely affected in any way by the action. Examples include:

- Accepting gifts, donations, or entertainment from another Company in return for business.
- Holding a financial interest in a company, by either you or a member of your immediate family, with whom the Company does business and influencing the direction of more business to the outside company.
- Directing Company business to an entity where a friend or relative works.

Before taking any action that might raise a conflict of interest, seek guidance from your supervisor or the Compliance and Integrity Office. (See: *HealthTeam Advantage Employee Handbook, September 2017*).

Outside Activities

The Company values and supports your involvement in the community. Sometimes these activities, including other employment, may have the potential to interfere with your work performance in a way that negatively impacts the Company. If you think that your outside activities interfere or may interfere with Company activities, talk to your supervisor or the Compliance and Integrity Office. (See: *HealthTeam Advantage Employee Handbook, September 2017*).

Gifts & Entertainment

Gifts and entertainment raise many questions. Employees shall not be permitted to accept gifts, money, or other gratuities from outside individuals or entities. It is acceptable to accept small tokens of appreciation as long as the value of the item is under \$100. (See: *HealthTeam Advantage Employee Handbook, September 2017*).

Employees should not solicit meals or entertainment from any individual or entity. In some cases, it may be acceptable to accept meals and entertainment offered by outside individual or entities in business dealings. These must be:

- Reasonable and not excessive;
- Infrequent;
- Compliant with Company, federal and state laws; and
- Approved by management.

There may be instances when giving gifts and entertainment is acceptable but must still comply with the law and the Company policies.

- Never give monetary or nonmonetary gifts, either directly or non-directly, that might appear to influence, obtain, or retain business. Monetary may include cash or cash equivalents (e.g. gift cards).
- There are specific rules about gift giving in government related business. As a general rule:
 - No cash or cash equivalent; and
 - Medicare Advantage or Part D is limited to \$15 per item and \$50 per calendar year.
- For non-government business, employees may give nominal monetary and non-monetary gifts, and should be primarily advertising in nature. General guidelines provide the gifts are limited to \$100 per year, per individual.

Conference and Seminars

The Company recognizes that employees may need to be provided the opportunity for professional development and to earn continuing educational credits to a degree or certification. The Company does not permit any outside entity or individual doing business with or wanting to do business with the Company from paying for an employee's expenses to attend a conference or seminar. This may include the conference fees, airfare, lodging, meals, etc. An exception may be made for written contractual agreements or when speaking at a conference or seminar. Check with the Compliance and Integrity Department at 855-741-4518.

Contacts with Government Officials

Federal and state laws and regulations govern the Company's contacts with elected officials or their families. There are prohibitions on what can be offered by way of gifts, meals, entertainment, etc.

When interacting with government officials, cooperate fully and honestly with them in audits and inquiries. Always be truthful and accurate. Oral and documented representations made to the government must always be clear, accurate, complete and not misleading. Employees should consult with the Compliance and Integrity Department on issues that involve these officials.

Anti-Kickback Statute

Employees should not accept kickbacks or rebates from the purchase or sale of any Company goods and services. This applies to you and your immediate family members. Kickbacks and rebates are not limited to cash or cash equivalent items, but also can be in the form of personal gain from the business dealing.

There are also strict federal laws that apply that prohibit kickbacks. The federal Anti-Kickback Statute prohibits the direct or indirect offering, giving, soliciting, or accepting of any money, fee, commission, credit, gift, gratuity, thing of value, or compensation of any kind to improperly obtain or reward favorable treatment under any government contract. This includes kickbacks and rebates to or from a vendor, provider, or government agency, or their employees, in connection with favorable treatment under a federal health care program such as Medicare. By law, the Company is required to report violations of the Anti-Kickback Statute to the government and it is critical that all potential violations are reported to the Compliance and Integrity Department.

If you violate the Anti-Kickback Statute or other anti-fraud laws, you may be subject to disciplinary action, including termination of employment and legal action.

Federal False Claims Act

Federal and state false claims acts establishes liability for any person who knowingly presents or causes to be presented a false or fraudulent claim to the government for payment. It also established that the failure to return any overpayment of government funds may also be a false claim. Some examples include submitting a false claim for payment or approval; not returning overpayments; and making or using a false record or statement in support of a false claim. If you violate the Federal False Claims Act or other anti-fraud laws, you may be subject to disciplinary action, including termination of employment and legal action.

Stark Law (Physician Self-Referral Law)

The federal Stark physician self-referral law generally prohibits a physician from making referrals to an entity for certain designated health services if the physician (or an immediate family member) has a “financial relationship” with the entity.

If you violate the Stark Law or other anti-fraud laws, you may be subject to disciplinary action, including termination of employment and legal action.

Training and Education

On an annual basis, all employees will be required to take mandatory trainings and acknowledge the organizations Code of Conduct. These trainings include, but are not limited, Harassment, Privacy, Phishing Attacks, CMS Medicare Parts C & D General Compliance, and CMS Combating Medicare Parts C & D Fraud, Waste, and Abuse.

Information

You are responsible for safeguarding Company and member information. The Company has controls in place to help mitigate the risk of unauthorized use and access to information, including protected health information. Be mindful of the information you have and use care with it. (See: *HealthTeam Advantage Employee Handbook, September 2017*).

Proper Accounting

The Company maintains a system of internal controls which it believes provides reasonable assurance that transactions are executed in accordance with management’s authorization and are properly recorded in accordance with appropriate accounting, which includes written policies and procedures and examination by a professional staff of auditors. All employees are expected to adhere to these policies and to cooperate fully with internal and external auditors.

Use of Company Assets

The Company assets are to be used solely for the benefit of the company. Employees are responsible for assuring that company assets are used only for valid company purposes and are not used to access or view prohibited web sites or content, including but not limited to gaming and/or pornography. The Company reserves the right to monitor Internet traffic and retrieve and read any data composed, sent, or received through its online connections and stored in the computer systems. Users should not have an expectation of privacy regarding their use of assets or Internet access, and users expressly consent to such monitoring by the Company. Company assets include equipment, inventory, corporate data, concepts, business strategies and plans, financial data and other information about Company business. These assets may not be used to provide personal gain for employees or others.

Employees may not transfer any company assets to other persons or entities, except in the ordinary course of business. In addition, employees are prohibited from using company assets to visit impermissible web sites, including gaming and pornography. Doing so could result in disciplinary actions up to and including immediate termination of employment. Abuse or misuse of assets or Internet access provided is a violation of Company policy and may result in disciplinary action, up to and including termination of employment. Information No employee or affiliate should discuss company business practices, clinical situations, physician practices or employee performance in any situation in which they might be overheard or is not intended for public knowledge. You have the duty to protect this information.

Protected Health Information

The Company strives to maintain the confidentiality and security of all protected health information. Any suspected breaches of protected health information will be immediately addressed. Please contact Sikander Soomro, Senior IT Manager and Security Official at: 336-443-2519, (Ssoomro@healthteamadvantage.com) or Thomas Wilson, Vice President and Chief Compliance and Privacy Officer 336-790-4387 (TWilson@healthteamadvantage.com). Timely notifications to the member and others as needed, will occur.

The care of each member is a personal, confidential matter and protected health information (PHI) must not be discussed or disclosed to any unauthorized individual or in any other unauthorized fashion. An example of an intentional violation is researching, viewing and/or sharing PHI for personal use that is not related to performing work duties. Any employee discussing or revealing confidential information will be subject to appropriate corrective action, up to and including termination, and may also be subject personally to federal penalties or prosecution. (See: Policy 1.50 Privacy and Confidentiality, January 2018, and SOP 1.50.02 Protected Health Information Authorization, July 2018).

The company will also take reasonable steps to limit incidental uses and disclosure of PHI made according to an otherwise permitted or required use or disclosure such as: discouraging staff from discussing PHI anywhere except in a closed office; training staff and managers on importance of confidentiality when dealing with PHI; encouraging employees to follow up with their health insurance carrier if they have questions about their own claims data and activity. (See: HealthTeam Advantage Employee Handbook, September 2017).

If an employee becomes aware of a non-permitted disclosure (i.e. breach) of PHI from a member, provider or vendor, report it immediately to the Compliance and integrity Department at privacyissues@healthteamadvantage.com or by contacting the Compliance and Integrity Department at 336-790-4387. The department has processes to respond to non-permitted disclosures and usually requests the recipient of the disclosure to destroy the information.

Electronic Communications

The Company's electronic communication systems exist for the legitimate business of the Company. Use of the electronic communication systems is prohibited for purposes that are not for the legitimate business of the Company. Incidental use of electronic communication systems for personal, non-business purposes is permitted in limited circumstances. Information on the systems is not private. (See: *HealthTeam Advantage Employee Handbook, September 2017*).

Retention of Records

Legal and regulatory practice require the retention of certain records for various periods of time, particularly in the tax, personnel, health and safety, environmental, contract, corporate, and government program areas. When litigation or a government investigation or audit is pending or reasonably foreseeable, however, all relevant records must not be destroyed until the matter is closed, and this may include drafts and copies as well as employee's notes and papers. Destruction of records to avoid disclosure in a legal proceeding may constitute a criminal offense. For all pertinent Medicare Advantage and Part D records related to the contract during the contract term, these records must be kept for up to 10 years from the final date of the contract period. (See: *SOP 1.00.70 TP Document Retention*).

Electronic Mail (Email)

Email is a computer software application supplied to the Company users as an aid to productivity and communication for business purposes. Email is intended only to benefit the Company and, therefore, any email failures will not give rise to damage claims by either Company affiliates or third-party users; by using email, the affiliate or third-party user acknowledges no right to a claim exists. (See: *HealthTeam Advantage Employee Handbook, September 2017*).

All electronic communications, whether sent within Company or to persons outside Company, should be courteous and professional in all respects and should not contain any statements that may violate Company's harassment policies or that would embarrass the Company, its affiliates, or its customers. Email storage is a limited resource and is not to be used as a permanent storage facility. Emails may be automatically purged from the email system without notice to employees at intervals established by the Company.

Email communications that are confidential or contain PHI are required to be encrypted by the employee. The company has a system readily available for all employees to encrypt emails on a case-by-case basis. Employees simply need to write "Secure" in the subject line of an email that contain confidential or PHI. Emails that are not encrypted that contain PHI is a violation of company policy and could result in disciplinary action up to and including termination.

Copyright Materials

The Company strictly adheres to all agreements regarding the use and distribution of copyrighted material. The email system may not be used to share software, but it may be used to send files and information to authorized users in accordance with all such restrictions. The Company may be licensed for use of programs or material with restrictions not to copy or distribute under the penalty of law. It will be each person's responsibility to adhere to all copyright restrictions. No software may be downloaded or installed without the prior knowledge and approval of the Company. In addition, the illegal downloading and copying of copyrighted software and/or other copyrighted materials is prohibited. As a means of controlling Internet usage, the Company has a computer system firewall which logs all internet usage and content. (See: HealthTeam Advantage Employee Handbook, September 2017).

Confidentiality and Access to Email

E-mail sent or received on Company's network is neither private nor confidential. Company reserves the following rights:

- To monitor all email transmissions as needed to determine if email is being used for other than legitimate business reasons and to protect Company against copyright infringement, loss of trade secrets or other business policy violations.
- To record and disclose to others all electronic communications at any time, with or without notice. No employee or other user of the email system has a privacy right in anything created, received or sent on or from the email system.

Under certain circumstances, it may be necessary for Company to review email messages or logs. Such circumstances include, but are not limited to:

- Suspected violations of Company policies or illegal activity.
- Litigation involving Company that results in a subpoena for production of documents, including email messages.
- Urgency in retrieving vital messages when an employee is not available to give his or her approval.
- Termination of employment.
- Upon request by a manager or supervisor.

As a result, all employees should exercise extreme caution before sending information through the email system, as email messages are not private and can be intercepted by other parties. Email users should be aware that email messages can be monitored and recorded at any time and deleted email may be restored. Email users should exercise extreme caution before sending email messages to parties outside the Company network; unless they are *encrypted*, such messages can be intercepted and read during transmission. (See: HealthTeam Advantage Employee Handbook, September 2017).

Social Media

We are committed to protecting privacy and maintaining an appropriate work environment. Use of social media should be consistent with all policies and procedures. We trust and expect you will use good professional judgment and personal responsibility at all times. This includes participation in social media, including activity during and off work time and /or off the premises. Make sure you know and follow the related policies regarding privacy and employee conduct; you don't post anything on social media in the name of the Company without prior approval; and the equipment and work time should not be used to engage in personal social media activities. Use of Company computer systems is not private. (See: HealthTeam Advantage Employee Handbook, September 2017).

Fraud, Waste and Abuse

The Company participates in federal programs with specific fraud, waste and abuse requirements. There are differences between fraud, waste and abuse. One of the primary differences is intent and knowledge. Fraud requires the person to have an intent to obtain payment and the knowledge that their actions are wrong. Waste and abuse may involve obtaining an improper payment but does not require the same intent and knowledge. (See: *Policy 1.20 TP Medicare Advantage and Part D FWA*).

The government defines fraud, waste and abuse as follows:

Fraud

Knowingly and willfully executing, or attempting to execute, a scheme or artifice to defraud any health care benefit program or to obtain (by means of false or fraudulent pretenses, representations, or promises) any of the money or property owned by, or under the custody or control of, any health care benefit program. 18 U.S.C. § 1347.

Waste

Waste is the overutilization of services, or other practices that, directly or indirectly, result in unnecessary costs to the Medicare program. Waste is generally not considered to be caused by criminally negligent actions but rather the misuse of resources.

Abuse

Abuse includes actions that may, directly or indirectly, result in: unnecessary costs to the Medicare Program, improper payment, payment for services that fail to meet professionally recognized standards of care, or services that are medically unnecessary. Abuse involves payment for items or services when there is no legal entitlement to that payment and the provider has not knowingly and/or intentionally misrepresented facts to obtain payment. Abuse cannot be differentiated categorically from fraud, because the distinction between “fraud” and “abuse” depends on specific facts and circumstances, intent and prior knowledge, and available evidence, among other factors.

If you have a question about a potential fraudulent, wasteful or abusive activity, you should immediately raise it up to your supervisor or the Compliance and Integrity Department. The Centers for Medicare & Medicaid Services has certain requirements to investigate and report out on fraud, waste and abuse. As a reminder, you can always contact the Compliance and Integrity Department Helpline at: 855-741-4518, visit www.hta.ethicspoint.com, or you can send a note or letter to:

Attention: Thomas Wilson
HealthTeam Advantage Chief Compliance Officer
7800 McCloud Road, Suite #100
Greensboro, NC 27409

These options allow you to submit your question or potential issue anonymously.

Acknowledgment

The Code of Conduct is an overview of the laws and company policies that affect our jobs. It does not represent an employment contract or change the at-will nature of the employment relationship. If there is a conflict between the Code of Conduct and applicable law or a formal Company policy, the actual law or policy will govern.

I have received and understand the Code of Conduct for HealthTeam Advantage. I agree to follow the Company's policies and procedures, understand the content, and have been given the opportunity to ask questions related to the laws and company policies.

I understand my obligation to report suspected or real compliance issues to my supervisor, human resources or the chief compliance officer.

| | |
|------------------------------|--|
| Date | |
| Employee Signature | |
| Employee Name (please print) | |
| Employee ID Number | |

Please complete, sign, and return to

**HealthTeam Advantage
Compliance and Integrity Department
7800 McCloud Road, Suite #100
Greensboro, North Carolina 27409**