



Code of **CONDUCT**

The Principles that Guide Us

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A MESSAGE FROM THE CHIEF EXECUTIVE OFFICER





Trust is an asset that can never be taken for granted. Without it, we would be unable to meet our customers' health care needs. Blue Cross and Blue Shield of Nebraska (BCBSNE) is, and always has been, successful because of our commitment to honesty and integrity. It's the only way we know how to do business.

To preserve the public's trust, we have developed a **Compliance and Ethics Program**. Our Compliance and Ethics Program establishes behavioral standards and monitors compliance with laws and regulations. It also provides a means for employees to ask questions or voice their concerns. In it, we pledge to not only do what is legal, but to always do what is right.

The foundation of our Compliance and Ethics Program is the BCBSNE **Code of Conduct**. The Principles outlined in our Code provide the basis for our everyday workplace behavior and provide us the tools we need in order to make honest and ethical decisions.

We are often faced with ethical questions at work. Our Compliance and Ethics department is here to provide guidance, discuss your concerns, and help you work through these issues. I encourage you to contact the Compliance and Ethics department when you are not sure how to handle a situation.

While our Code applies to directors, officers, management, and employees, we hope that all BCBSNE agents, business partners, vendors, contractors, and consultants understand the importance of our Code when doing business with our company.

In conclusion, our Code is only meaningful if used. That's why it's important to apply these Principles every day and review them from time to time on your own. As you read our Code, always remember your job involves more than just health insurance; our customers trust us to be there for them when they're at their most vulnerable.

A handwritten signature in white ink, appearing to read "Jeff Russell". The signature is fluid and stylized, with a large loop at the end.

Jeff Russell
Chief Executive Officer



Introduction

**BEING KNOWN FOR HONESTY IS ONE OF BCBSNE'S MOST VALUABLE ASSETS
AND IT IS UP TO EACH OF US TO MAINTAIN THE PUBLIC'S TRUST.**

BCBSNE's Code of Conduct (our Code) and Core Values provide the foundation for our ethical business practices. Our Code applies to ALL of us (employees, management, officers, and our Board of Directors). It's important that you understand its principles because we hold ourselves to a high standard of behavior. We expect every person at BCBSNE to act with these standards in mind.

DETERMINE HOW TO RESPOND IN AN ETHICAL SITUATION BY ASKING YOURSELF THESE QUESTIONS:

- Will it hurt my reputation if my actions become known to my supervisor, coworkers, friends, or family?
- Would I be embarrassed if my actions were made public on the internet or television?
- Could my actions appear wrong to others, even if they are legal?



PURPOSE

We exist to be there for our customers when they need us.



CODE PRINCIPLES

- Shared Responsibility
- Safe and Respectful Workplace
- Honest and Fair Business Dealings
- Protect Assets and Information
- Compliance with Laws



1 Shared Responsibility

- WE ARE ALL RESPONSIBLE FOR COMPLIANT AND ETHICAL BEHAVIOR.
- EVERYONE HAS A DUTY TO REPORT.
- NON-RETALIATION IS STRICTLY ENFORCED.

This principle reminds us that ethical business conduct is the responsibility of every BCBSNE employee. To maintain our reputation for honesty and fair dealing, it is important that we all help each other.

As a health insurer, we are subject to many legal requirements. In addition, we are committed to ethical standards that help us protect our reputation in the marketplace. Therefore, we must understand these obligations and follow them every day. Resources are available to enable you to ask questions, seek guidance, and report instances of what you believe may be either unethical behavior or noncompliance with Human Resources (HR) laws.

Your manager and the HR department are available to discuss issues you may have in this regard.

Or, you may always reach out to the Compliance and Ethics department by phone, online form, email, or in-person to discuss your questions, issues, or concerns.

If you would like to anonymously report what you believe to be unethical behavior or noncompliance with laws, you may do so by contacting the Compliance and Ethics Hotline, either by phone at 877-258-3222 or online.

All reports are taken seriously and will be investigated in accordance with BCBSNE policies and procedures. Remember that violations of our Code may result in corrective action up to and including termination of employment.

Your responsibilities under our Code:

- Follow our Code and BCBSNE policies.
- Ask if you don't know how to handle a situation.
- Report violations.
- Fully cooperate with inquiries and investigations.

Always Remember

Any employee making a good faith report will not be subject to corrective action. In addition, there will be no retribution for making a report. Anyone who engages in any form of retaliatory behavior will be subject to the full range of corrective action, up to and including termination.



PRINCIPLE #1 CONSIDER THIS:

Q: I want to report what I think is a violation of our Code of Conduct, but am not sure how to do this. I also want to remain anonymous. What should I do?

A: The BCBSNE Compliance and Ethics Hotline is available by phone at 877-258-3222 or online. The phone line is not answered by a live person but allows you to leave a message. While it is not necessary to identify yourself, enough information should be provided so that the Compliance and Ethics department may properly and fairly investigate and resolve the matter.

Note: Every report is investigated. However, if you make an anonymous report, the Compliance and Ethics department is unable to provide you with information regarding the status or resolution of the investigation. If you make an anonymous report, remember this and do not assume nothing was done in response to your report. Alternatively, if you think you would like to know the status and resolution of the investigation, we ask that you trust in the confidential nature of the Hotline and share your contact information when leaving your message.

Q: I think someone filed a false report against me with the Compliance and Ethics department. This doesn't seem fair. What should I do?

A: You should contact the Compliance and Ethics department. Any individual who knowingly makes a false report will be subject to corrective action, up to and including termination.

HOW TO SPEAK UP:



877-258-3222

The Compliance and Ethics Hotline is available by phone and is not answered by a live person. Instead, it allows you to leave a message — so give us a call, take your time, and share the information you feel comfortable sharing.



INBLUE

The Online Compliance and Ethics Hotline is available internally from InBlue, under the Enterprise menu.



SCAN HERE:

Use your smartphone's camera to scan this code and be taken to the Online Compliance and Ethics Hotline. No login needed, and it works from any network.





2 Safe and Respectful Workplace

- RESPECT AND TREAT EVERYONE EQUALLY AND FAIRLY.
- VALUE UNIQUE PERSPECTIVES AND VIEWPOINTS.
- ADDRESS HARMFUL RUMORS AND GOSSIP.
- PROTECT THE SAFETY OF OUR WORKPLACE, YOUR COWORKERS, AND GUESTS.

Respect. Safety. Objectivity. Equality.

These key concepts affirm this principle. How we treat each other in our daily work is as important as how we treat our customers and business partners. We should remember that while clearly improper activities, such as discrimination and harassment, will not be tolerated, seemingly innocent behavior, such as spreading gossip and rumors, can cause distress and ill will among co-workers. If you observe these behaviors, remember your responsibility to report it to your manager, HR, or the Compliance and Ethics department.

2. A – Discrimination and Harassment

Discrimination and harassment are forbidden at BCBSNE. BCBSNE will not allow discrimination of individuals based on race, religion, gender, sexual orientation, national origin, age, genetic information, disability, marital status, or veteran status. BCBSNE will not allow harassment or sexual advances, actions, comments, or any other conduct that creates a hostile or offensive atmosphere. This applies to all forms of communication including, but not limited to, email, phone, and instant messaging.

2. B – Violence

Any acts or threats of violence made by an employee against any other employee's life, well-being, family, or property will not be allowed.

2. C – Substance Abuse

BCBSNE forbids the possession, use, or distribution of illegal drugs or misuse of legal drugs on BCBSNE owned or leased property, or while representing BCBSNE at any time.

PRINCIPLE #2 CONSIDER THIS:

Q: A coworker often makes “jokes” about certain ethnic groups. I find these “jokes” insulting and offensive, but I’m afraid to confront him/her. What should I do?

A: Your coworkers “jokes” directed at certain groups of people because of such characteristics as the color of their skin, the country of birth, or their accent are examples of discrimination and harassment, which are forbidden at BCBSNE. You should report the incident to your manager, HR representative, or the Compliance and Ethics department. If you wish to remain anonymous, you may contact the Compliance and Ethics Hotline by phone at 877-258-3222 or online.

Please consult BCBSNE’s HR policies for more information regarding harassment, violence, and substance abuse.





3 Honest and Fair Business Dealings

- TREAT EVERYONE HONESTLY AND FAIRLY.
- AVOID CONFLICTS OF INTEREST.
- DON'T GIVE OR RECEIVE GIFTS, COURTESIES, GRATUITIES, OR HONORARIUMS IN EXCHANGE FOR FAVORABLE TREATMENT OR TO SECURE BUSINESS.

Your judgment and integrity are attributes that should never be seen as *for sale*. We must always avoid even the slightest appearance of this by disclosing relationships and the giving and receiving of business related gifts. If you and/or your family have personal or financial interests that conflict with those of BCBSNE, they must be reported and resolved.



3. A – Conflicts of Interest

You must avoid any situation where your personal relationships or activities could influence or appear to influence your actions.

If you or your immediate family member has an interest in or a relationship with any company that does business with or seeks to do business with BCBSNE, this may be a conflict of interest and must be disclosed.

In no event should you have an interest in or serve as a consultant, director, officer, or employee of a direct competitor of BCBSNE.

Finally, you may not use your position or knowledge obtained at BCBSNE to secure personal or financial gain.

3. B – Gifts, Courtesies, Gratuities, and Honorariums

Gifts and Courtesies: You cannot ask for or accept gifts and business courtesies in exchange for favorable treatment or to secure business. Employees can accept a gift or courtesy of nominal value (advertising or promotional nature). You can also provide gifts, entertainment, meals, and other business courtesies of nominal value to customers and prospective business partners or others if there is a legitimate business purpose.

Note: Federal law strictly prohibits BCBSNE from providing meals or entertainment to Federal employees.

Vendor-Sponsored Activities: You can accept meals, entertainment, donations to a charity, and other business courtesies at a vendor's expense if the activity is a reasonable extension of a business relationship. You can attend a local workshop, seminar or training session at a vendor's expense. If the event is not local, you must get prior approval from the Compliance and Ethics department.

Bribes and kickbacks are not only unethical, but illegal to offer or accept. BCBSNE employees and their families must never accept inducements to either secure business (bribe) or to reward the securing of such business (kickback). In all cases, you should not offer or accept any gift which might give this impression.

Prizes: Prizes that are offered without cost and awarded by chance (e.g., random drawings) are not considered business courtesies and may be accepted; however, those of more than nominal value must be reported to the Compliance Officer on the annual Conflict of Interest Questionnaire and Disclosure Statement.

Honorariums: You should not accept a payment, such as cash, gifts, or travel and lodging expenses, for speaking engagements and participation in a panel and/or focus work group on behalf of BCBSNE. This is called an honorarium and could be perceived as a conflict of interest. If there is a legitimate benefit to BCBSNE for you to attend the event, BCBSNE will pay for the traveling expenses.

3. C – Fair and Ethical Competition

BCBSNE is committed to ethical professionalism. We treat employees, customers, business partners, and competitors in a fair and honest manner. You must never discuss or be involved in a discussion that includes the following activities:

- Price Fixing – collaborating with a competitor to decide what to charge for a product.
- Unfair or Deceptive Advertising – advertising which is untruthful or misleading.
- Group Boycotts – agreeing with competitors to refuse to deal with particular vendors.
- Customer or Market Allocations – agreements to allocate the market for our goods and services among ourselves and our competitors.

You must not ask for or obtain information about our competitors in a manner that would be illegal or would require a person to violate a contractual agreement, such as a confidentiality agreement with a prior employer.

All information given to our customers and community about our products and services must be truthful and accurate. You must not misrepresent material facts, conceal information, or engage in any other unfair business practice.

PRINCIPLE #3 B CONSIDER THIS:

Q: One of our vendors has offered me an all-expenses-paid trip to Denver to attend and participate in a panel discussion at a conference they are sponsoring. The subject matter of the conference directly relates to my job duties. Can I accept this vendor's offer?

A: No, you should not accept the vendor's offer to pay for your travel expenses. This would be considered an honorarium and could be perceived as a conflict of interest. However, it appears that there is a legitimate business purpose for attending the event so you should ask your manager if BCBSNE will pay for the expenses.

PRINCIPLE #3 C CONSIDER THIS:

Q: I work as a claims auditor. My daughter is a physician and her clinic regularly bills BCBSNE for services. Occasionally, I review some of the services that she or her clinic delivered to one of our members. Is this wrong?

A: This would appear to be a conflict of interest. The relationship with your daughter should be disclosed on the annual Conflict of Interest Questionnaire distributed to all employees. Once this relationship is disclosed and evaluated, you would be advised that in order to remove the conflict, you should not review any bills submitted by your daughter or her clinic.



4 Protect Assets and Information

→ **LOSS, THEFT, OR MISUSE OF COMPANY ASSETS AND INFORMATION CAN HARM OUR CUSTOMERS, OUR BUSINESS OPERATIONS, AND OUR REPUTATION. IT IS NOT ONLY UNETHICAL, BUT COULD BE CRIMINAL.**

Company assets take many forms and confidential information comes to us in a wide variety of formats. We must be good stewards of all assets and ensure all of our information is properly used, shared, stored, and destroyed.

4. A – Information

BCBSNE maintains three classes of information, with levels of security applied to each to keep the information confidential.

Proprietary Information is information that BCBSNE owns. You may not use or disclose BCBSNE proprietary information outside of the company except for a legitimate business purpose. This information must not be disclosed, even if your employment has ended with BCBSNE. Some examples of proprietary information include customer lists, financial information, and strategic planning documents.

Protected Information is information owned by BCBSNE and includes the Protected Health Information (PHI) of our members. The Health Insurance Portability and Accountability Act of 1996 (HIPAA) and the Health Information Technology for Economic and Clinical Health (HITECH) Act prohibit improper uses and disclosures of PHI. It is critical that you follow BCBSNE's privacy policies and procedures at all times. Any use or disclosure of PHI is subject to potential civil and/or criminal fines and penalties. Some examples of protected information beyond PHI includes employment records, passwords and access codes, and all contracts.

Privileged Information is available only on a "need to know" basis to selected members of the workforce. If privileged information is compromised, there could be severe financial, legal, regulatory, or reputation damage to our customers, vendors, business partners, employees,

and our business operations. Some examples of privileged information include audit findings, legal work products, and intellectual property, such as system source codes and software.

4. B – Other BCBSNE Assets

You are expected to use company assets for business purposes. Computer, internet access, and other equipment along with supplies and your time at work are assets of BCBSNE. BCBSNE may not – directly or indirectly – extend, maintain, or arrange for the extension of credit, or renewing an extension of credit in the form of a personal loan to or for any director, officer, or employee of BCBSNE, except travel advances provided pursuant to company policy.

Intellectual Property: BCBSNE owns all intellectual property that you develop or create for BCBSNE either on your own or with another person, while employed by or contracted with us.

Software Licenses: Most computer software is protected by copyright laws and purchase agreements that protect the software manufacturer's investment in creating the software. You should always comply with the license agreements that govern the use of software purchased by BCBSNE.

4. C – Records and Information Management

It is the responsibility of all of us to follow the Records and Information Management (RIM) program. This program addresses the maintenance, retention, protection, and destruction of company records in accordance with legal requirements, regulations, and business practices.

4. D – Truthful and Accurate Reporting

All of us have a responsibility to ensure that all information recorded and reported is truthful and accurate. This includes the correct reporting of time worked, business-related expenses, performance data, and any other business related activities. The alteration and/or falsification of any information in any record or document or attempt to influence, coerce, manipulate, or mislead any independent certified public accountant during an audit is prohibited.

It is a felony to knowingly make false claims or statements to the federal government. This type of conduct may subject BCBSNE and you to civil and criminal sanctions including fines, prison, and suspension or disbarment from federal contracting. It is essential that you take any and all steps necessary to ensure that you do not assist with, make or transmit any false claims, statements, or certifications.

PRINCIPLE #4 CONSIDER THIS:

- Q:** My sister asked me to look up one of her claims because her provider notified her that it has not been paid. I have access to the necessary systems and I want to help her. Also, I want to look up a few of my own claims that I have questions about. Can I do this?
- A:** No. You must never access PHI unless such access is authorized for a valid business purpose (specifically related to or required by your job) or required by law. You must never access claims or other PHI relating to friends, family members or those with whom you have a personal relationship. You should advise your sister to follow normal business process by contacting Customer Service or accessing myNebraskaBlue.com for information on her claim. Furthermore, you must not access your own information. If you need information relating to your own health coverage, you must follow normal business process by contacting Customer Service or by accessing myNebraskaBlue.com.



5 Compliance with Laws

- BCBSNE IS A HIGHLY REGULATED BUSINESS.
- OUR LICENSE STATUS DEMANDS COMPLYING WITH ASSOCIATION MANDATES AND REQUIREMENTS.
- WE ARE A STATE AND FEDERAL CONTRACTOR.

Ethical business practices require that we comply with all laws, regulations, and standards. These may be federal laws, state laws, or various industry and Blue Cross Blue Shield Association (BCBSA) standards. Resources and assistance is available to aid in this compliance objective.

5. A – Laws, Regulations, and Standards

It is everyone's responsibility to follow the applicable state and federal laws and regulations that impact BCBSNE. We must also comply with BCBSA requirements as well as those created by accreditation, licensing, and oversight bodies. All employees must adhere to our own policies, processes, and procedures.

5. B – Government as a Customer

As a government contractor (e.g., the Federal Employee Program and Medicare Parts C and D), we have a special obligation to the government and the public to ensure the highest degree of integrity. When the government is our customer, there are additional laws and regulations involved in the areas of false and fraudulent claims, cost records, price estimation, time charging, gratuities, kickbacks, and classified information. Therefore, special care and attention must be given to ensure that we understand and comply with these additional laws and requirements.

The **Federal False Claims Act (FCA)** forbids knowingly and willingly making false statements or representations in connection with a claim submitted for reimbursement

to a federal health care program. Under the FCA, you can report fraud, waste, and abuse directly to the government or you may file a lawsuit on behalf of the U.S. Government against individuals and/or entities you allege defrauded the government by filing false or fraudulent claims. This lawsuit is referred to as a qui tam or whistleblower lawsuit. The FCA prohibits employers from retaliating against their employees who report fraud, waste, and abuse to the government or who file a lawsuit on behalf of the government. Refer to the federal FCA policy for more information.

The **Federal Acquisition Regulation (FAR)** empowers federal contractors such as BCBSNE to ensure that our supply chain is free from human trafficking and other forced-labor activities. BCBSNE believes that all workers in our supply chain deserve a fair and ethical workplace and requires that our covered contractors uphold the highest standards of human rights. Under FAR, if you suspect unfair labor or human rights violations by a covered contractor, you are required to report your concern to the Compliance and Ethics Hotline (by phone at 877-258-3222 or online) as soon as possible.



5. C – Political Activity and Contributions

As an individual, you are encouraged to participate in the political process. Your participation is limited, however, by federal, state, and local law. You may not include political contributions on expense reports, use company time for personal political fundraising, or use BCBSNE assets for political purposes. Always make it clear when you participate in the political process that you are doing so on your own time and expense and you do not speak for BCBSNE.

PRINCIPLE #5 CONSIDER THIS:

- Q:** If I become aware of a new law that may affect BCBSNE, what should I do?
- A:** Please contact the Compliance and Ethics Hotline (by phone at 877-258-3222 or online) to share what you know about the new requirement. You may also tell your manager, who will contact us.
- Q:** I think we are doing something in my department that is in violation of the law. Should I report this to someone?
- A:** Yes, as stated in the Code of Conduct, you have a duty to report violations. If you do not feel comfortable taking this issue to your manager, you should contact the Compliance and Ethics Hotline (by phone at 877-258-3222 or online).

➔ **ALWAYS REMEMBER: WE ARE ALL RESPONSIBLE FOR COMPLIANT AND ETHICAL BEHAVIOR.**



Conclusion

A MESSAGE FROM CAMERON ARCH, COMPLIANCE OFFICER

Nebraskans trust us to be there for them. From helping people live their healthiest lives, to making a meaningful impact during life's more difficult challenges, we've served our customers and community for over 85 years—building trust along the way.

Without that trust, we couldn't exist as a company. That's why it is so important to remember our work impacts people's lives every day, and that how we do our work matters. The principles of our Code of Conduct are guidelines for each of us to ensure we're upholding the trust we've worked so hard to earn.

If you ever need guidance beyond what is offered in the Code, I encourage you to contact me, a member of my team in Compliance & Ethics, or our Hotline. My door is always open to you.

Thank you for your commitment to our members, to each other, and to the principles of our Code.

A handwritten signature in white ink that reads "Cameron Arch". The signature is fluid and cursive, with the first name and last name clearly distinguishable.

Cameron Arch
Compliance Officer, Associate General Counsel

Notes

Standards and Ethical Guidelines for Blue Cross and Blue Shield of Nebraska,
an Independent Licensee of the Blue Cross Blue Shield Association.

8646-508 (11-01-24)

