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Integrity

noun

in·teg·ri·ty | \ in- ' te-grə-tē

a firm adherence to a code of especially moral or artistic values. – Webster's Dictionary



MESSAGE

Dear Highmark Health Colleague:

Highmark Health's brand stands for trust and confidence. This trust is based on our persistent commitment to our vision to be the recognized leader in structuring, financing, and delivering high-quality, affordable health care and services to all members of the communities we serve. Conducting ourselves with the highest level of integrity is paramount to achieving our shared vision.

At Highmark Health, our customers and patients have been, and always will be, our moral and strategic compass. We believe they deserve a remarkable health experience, freeing them to be their best. We are committed to maintaining the highest ethical standards. In a business of trust, we believe behaving ethically, lawfully, and with integrity is the only way to be.

The Highmark Health Code of Business Conduct (herein referred to as 'the Code') provides an overview of the legal requirements applicable to what we do, as well as how to act as good corporate stewards to protect our good name and reputation. If you observe, learn of, or in good faith suspect an action or situation violates a law, regulation, or a Highmark Health policy or any of its entities' policies or procedures, or breaches the standards of conduct defined in this Code, you must report it.

The information contained in this Code is the framework for making business decisions that will ensure we are fulfilling our responsibilities with integrity. Therefore, to encourage all employees to speak up when they have questions or concerns or experience wrongdoing, Highmark Health has a non-retaliation or intimidation policy. This means retaliation or intimidation against those who, in good faith, report concerns or wrongdoing to management, Integrity and Compliance Department, or to a government agency, is prohibited.

Highmark Health provides many resources to assist you. You may contact your leader, Human Resources, the Integrity and Compliance Department, or utilize the anonymous Compliance Helpline. All questions and concerns will be treated confidentially and will be promptly addressed.

We encourage you to read, become familiar with your responsibilities, and to practice the guidance outlined in this Code. Highmark Health leaders have the additional responsibility to make compliance with this Code a vital part of our business. Every member of Highmark Health's Board of Directors and leadership team is fully committed to conducting company business according to the Code of Business Conduct and in setting the ethical tone of the company. Thank you for supporting a corporate-wide culture of working with integrity.



David L. Holmberg

President and Chief Executive Officer,
Highmark Health



Joseph C. Guyaux

Chairman of the Board,
Highmark Health



Melissa M. Anderson

Executive Vice President, Chief Auditor
and Compliance Officer, Highmark Health



The world is changing. Our commitment to ethics hasn't.

The Coronavirus Disease 2019 (COVID-19) is changing everything. The disease has changed the way we interact with one another. It has also changed our work environment, including our work location, hours, and methods of how we approach our work. However, COVID-19 has not changed our deep commitment to the highest standard of ethical conduct. Highmark Health expects its workforce to conduct themselves according to the guidance in this document whether you are working at home, an office, a hospital, or a clinical setting.

Our work location may have changed, but our customers and patients remain at the center of everything we do.



INTRODUCTION

WELCOME! AT HIGHMARK HEALTH, WE ARE REINVENTING HEALTH CARE. HOWEVER, OUR COMMITMENT TO THE HIGHEST STANDARD OF ETHICAL CONDUCT HAS NOT CHANGED.

The Highmark Health enterprise includes a network of leading companies and health care facilities committed to getting health care right for millions of Americans across all 50 states and the District of Columbia.

Through our diversified portfolio of businesses, the organization's employees proudly offer products, services and solutions that meet the broad spectrum of health care needs of consumers, business customers, and government entities. Our portfolio includes businesses in health insurance, health care delivery, post-acute care management solutions, dental solutions, reinsurance solutions, and innovative technology-based solutions.

Highmark Health and our affiliated companies maintain a strong and historic commitment to the communities we serve, expressed through the philanthropic works of our charitable foundations, through our corporate programs, giving and volunteerism, and through our historic commitment to diversity and inclusion.

INTRODUCTION



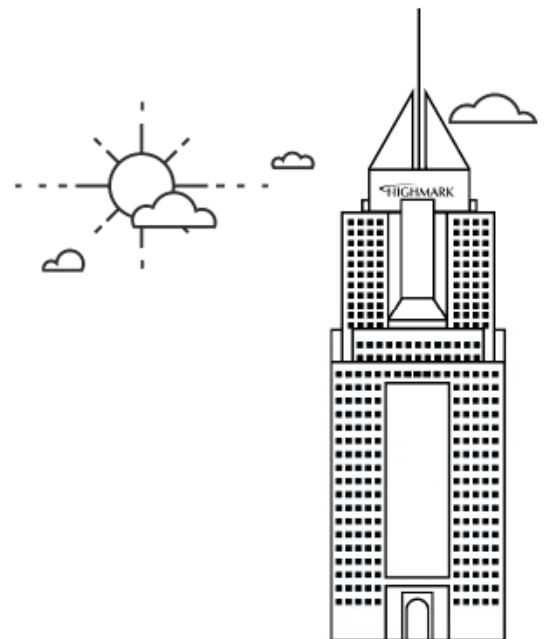
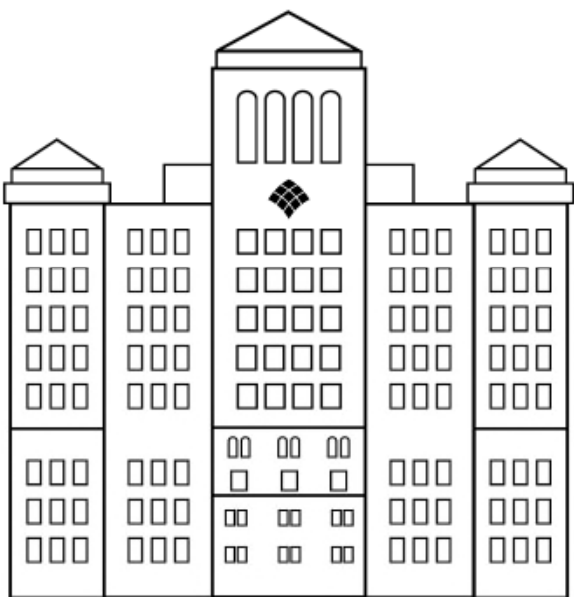
We recognize that it is not enough to merely comply with laws and regulations. We believe that it is imperative to abide by the highest ethical standards in serving our customers, patients, communities, and dealing with our fellow employees. Therefore, it is important that we do not lose sight of one basic principle of integrity: “We care not only for the end result but how it is obtained.” This means conducting ourselves with integrity in everything we do. The responsibilities and expectations found in the Code of Business Conduct are not new. Highmark Health’s Code of Business Conduct forms the foundation of our ethical culture. In fact, over the years it has become the cornerstone of Highmark Health’s commitment to integrity, one of our values.

All concerns deserve proper attention, no matter how small they are. If you are unsure about what to do in a given situation or feel like something just is not quite right, you are encouraged to consult with your manager or supervisor. You are also encouraged to contact the Integrity and Compliance Department using the resources outlined in this guide. We are counting on your assistance in preserving and strengthening our long-standing tradition as an ethical organization.

The Code applies to all members of the Board of Directors, officers, employees, workforce members, volunteers as well as contractors and vendors of Highmark Health and its affiliates and subsidiaries listed below:

- **Allegheny Health Network (AHN)** provides health care delivery, research, medical education, and wellness services through an integrated health care delivery network that includes hospitals; affiliated physicians; ambulatory surgery centers; a research institute; home-based and community-based health services; a group purchasing organization; and Health + Wellness Pavilions.
- **Highmark Inc.** and its Blue-branded affiliates (Health Plan) proudly cover the insurance needs of millions of individuals, families and seniors, offering a variety of products and services to meet their health care needs.
- **HM Health Solutions** combines cutting- edge technology and leading industry knowledge to deliver business solutions to health plan payers so they can run their organizations efficiently in a competitive and ever-changing market.
- **HM Home & Community Services** specializes in post-acute care management solutions for payers, providers, and patients.
- **HM Insurance Group** works to protect businesses and their employees from the financial risks associated with catastrophic health care costs.
- **United Concordia Dental** delivers high-quality, cost-effective dental care through a network of nearly 127,000 dentists and more than 400,000 access points.

For purposes of this Code, the above entities as well as their subsidiaries and affiliate will be referred to as Highmark Health. A complete list of Highmark Health companies can be found on pages 65, 66, and 67 of this document.





To create a remarkable health experience, freeing people to be their best.



A world where everyone embraces health.



People Matter

Every person contributes to our success.

Stewardship

Working to improve the health of the communities we serve.

Trust

Earned by delivering on our commitments and leading by example.

Integrity

Committing to the highest standards encompassing every aspect of our behavior.

Customer-Focused Collaboration

We collaborate with each other to achieve the right outcomes for our customers.

Courage

Empowering each other to act in a principled manner and take appropriate risks to do what is right.

Innovation

Exploring new, better, and creative ways to achieve our vision.

Excellence

Consistently exceeding the expectations of those we serve.

CORE BEHAVIORS



Customer First

We place the customer at the center of everything we do!

- We put ourselves in the customers' shoes
- We anticipate our customers' needs
- We simplify the customer experience
- We deliver solutions that go a step beyond
- We appreciate our customers' loyalty to Highmark Health

Transformational Leadership

We are driven to create the future of healthcare!

- We inspire through vision and action
- We are proactive in driving change
- We are authentic in who we are and what we do
- We embrace courageous conversations
- We challenge ourselves to continuously improve

Trust Working Together

We collaborate to achieve shared success!

- We involve the right partners at the right times
- We treat each other with honesty and respect
- We influence through relationship and not through position
- We trust one another to make the right decisions and do the right things
- We share risks and rewards

Purposeful Execution

We value outcomes, not activity!

- We set clear priorities and expectations
- We take ownership of our commitments
- We take calculated risks
- We are relentless in our pursuit of excellence
- We recognize and celebrate results

ETHICAL DECISION-MAKING MODEL

When faced with a decision,
ask yourself these questions:

- 1 Does it align with the company's core behaviors and values?
- 2 Would I want others to know of my decision or action?
- 3 Would you be comfortable if this decision made the news?
- 4 Will I feel good about my decision and actions?


YES 

OK


 **NO**

**DON'T
DO IT!**



CODE OF CONDUCT

The Code is a tool which helps you decide the right thing to do in each situation. In the final analysis, honesty should always be your guide. A well-founded reputation for honest, scrupulous dealing is itself a priceless personal and company asset.

Highmark Health will achieve its mission and goals if each of us guards its reputation. Use the Code always to do the right thing and to avoid even the appearance of impropriety.

While the Mission, Vision, and Values serve as a 'general road map' for each of us, our Code provides more details that clarify what is required in a variety of work situations. To make the Code more practical, we have organized it into eight chapters.

- 1. Committing to Integrity and Compliance**
- 2. Conducting Business in the Best Interest of Highmark Health and its customers**
- 3. Protecting Highmark Health's Information**
- 4. Complying with Legal and Regulatory Requirements**
- 5. Complying with Government Program Requirements**
- 6. Maintaining a Safe, Respectful, and Dignified Working Environment**
- 7. Seeking Advice and Reporting Concerns without Fear of Retaliation**
- 8. Conclusion**



Each of us plays a crucial role in our Company's ethical culture and business practices. To be effective, Highmark Health's Integrity and Compliance Program requires everyone's personal commitment. The program is guided by our values and is designed to promote a culture that encourages ethical behavior and a commitment to comply with applicable federal and state laws, rules, regulations, and guidance. We each have an obligation to understand and follow the values outlined in this Code. We certify annually our commitment to abide by the Code and company policies.

Ethical Leadership and Accountability

Leaders at all levels have the responsibility to set the example by always being role models of appropriate behavior. Ethical leadership at Highmark Health begins with the Board of Directors and senior leaders setting the ethical direction. By incorporating "integrity" as one of our corporate values, our leaders aspire to maintain a corporate culture that not only embraces the principle of doing the right things, but also doing things the right way.

Leaders will maintain a working environment that is free from harassment; coercion of any kind, especially to perform illegal or unethical acts; discrimination; and retaliation. Our leaders must ensure that workforce members, vendors, and contractors have a platform to freely express ethical concerns and provide mechanisms for discussing and addressing such concerns. Leaders are also charged with ensuring that they have sufficient information and resources to maintain compliance with regulatory standards and the Code of Conduct standards.

Leaders must encourage open communication about ethical and compliance issues that may arise. A vital component of this responsibility is to communicate regularly with each person on your team and to actively promote Highmark Health's values and ethical standards so that all of your workforce members, vendors, and contractors understand how the Code of Business Conduct and the Integrity and Compliance Program guide them in their decision making process.

Workforce Responsibilities

Annually, all members of the Board of Directors, officers, and workforce members are required to attest that they have read, understand, and agree to abide by the Code and the policies within their respective company. Employee attendance and participation in compliance program activities, including fraud waste and abuse training, is a job performance expectation and a condition of continued employment.

Additionally, all workforce members are expected to cooperate and assist in the resolution of identified compliance issues. Failure to do so may result in disciplinary action up to and including termination of employment. Highmark Health provides information and training to all workforce members so that they have an understanding of fraud, waste, and abuse laws including the False Claims Act, whistleblower protections, and the role employees play in the Company's compliance program. By committing to these responsibilities, we will continue to meet the expectations of conducting our business with integrity.

Vendors' Responsibilities

Highmark Health seeks to partner with those who share our values and ethical standards. Contractors, vendors and their employees, agents and subcontractors are expected to support the standards of conduct as described in this Code and to share and subscribe to Highmark Health's commitment to ethical business practices.

Contractors and vendors working with or on behalf of Highmark Health are obligated to conduct business activities and interactions ethically and in full compliance with applicable federal and state laws, regulations and contractual obligations; avoid actual or perceived conflicts of interest while doing business on behalf of Highmark Health; protect, use and disclose confidential information only as permitted or required by law and their contract with Highmark Health; and, report any questionable behavior, potential violations of this Code, or suspected fraud, waste and abuse to the Highmark Health Integrity and Compliance Department.

Compliance Officer and Integrity and Compliance

The Compliance Officer, who is appointed by and has direct access to the Board of Directors of Highmark Health, has overall responsibility for the Highmark Health Integrity and Compliance Program. The Integrity and Compliance Department within Highmark Health and its subsidiaries and affiliates, collectively referred to as "Integrity and Compliance Department" are responsible for administering the Program under the direction of the Compliance Officer. The Compliance Officer and Integrity and Compliance Department staff are available to offer guidance and support for all of your ethics or compliance questions or concerns.

2



**Conducting Business
in the Best Interest
of Highmark Health
and its customers**



Commitment to Quality

As an industry leader, Highmark Health has served our community with integrity and is committed to maintaining the highest standard of quality in our products and services for customers, members, and patients.

Our customers include individuals, local, state and federal government, and private businesses. Our customers expect our products and services to meet their requirements and quality standards. In order to preserve the reputation of our brand, we must strive every day to carry out all of our business contracts in accordance with the terms of those contracts and we must ensure that accurate and complete information is provided when negotiating and administering them.

Commitment to Quality Patient Care

Our primary mission is to make high quality health care accessible, understandable, and affordable. We treat all patients with respect and dignity and provide care that is both necessary and appropriate. We will respect and support each patient's right to competent, considerate, and courteous treatment or service within our capacity without discrimination due to gender, race, disability, age, religion, veteran status or military status, political affiliation, color, creed, national origin, ancestry, sexual orientation, or source of payment for care. While we strive to render care in an efficient manner, clinical care decisions are not based on patient financial means or business economics.

We provide treatment environments where patients and their families understand their individual illnesses and make informed decisions concerning their medical care. Each patient or patient representative receives a clear explanation of care, including diagnosis, treatment plan, and an explanation of the risks and benefits associated with each available treatment option or with no treatment. We inform patients of their right to make advance directives regarding treatment decisions, financial considerations, and the designation of a surrogate decision maker for health care. AHN honors patients' advance directives or wishes regarding resuscitation within the limits of the law and the organization's capabilities.

We believe all health care services or items recommended should be medically necessary as determined by the accepted professional standards of the relevant health professional. Medical necessity is the standard for making all care decisions and we believe that all patients have the right to be involved in all aspects of their care. Therefore, we encourage patients' participation in the development of their plan of care. Furthermore, we provide patients with sufficient information for their informed consent for surgery and other significant or invasive treatments or procedures.

Trained Professionals

We contract with and employ health care professionals with appropriate credentials, experience, and training to meet our patients' needs. Only licensed, and where applicable, credentialed/privileged personnel will perform clinical assessments and procedures or will be

supervised by those who are. Each health care practitioner shall be duly licensed or certified and shall only provide health care services or items to patients within the scope of his/her license and/or credentials/privileges. All providers and health care professionals are expected to be current with their respective privileges by maintaining their licenses/certifications/boards as applicable and through relevant educational training and teaching experiences.

Research Compliance

The AHN Research Institute oversees all human and animal research activities conducted at AHN. Research with human subjects has proven invaluable in advancing knowledge in the biomedical, behavioral, and social sciences. Such research is strictly regulated, with laws at the federal, state, and local levels. Further, professional societies have developed discipline-specific standards, policies, and guidelines to protect research subjects and to maintain the integrity of the research.

Research must be conducted in strict conformity with the applicable policies, research procedures and approvals, and the requirements of all governmental and private research sponsors, as well as compliance with federal, state, and local laws.

- Billing for clinical research subjects shall conform to AHN Research Institute policy, regulations, and laws.
- AHN Research Institute policies provide local guidance for compliance with federal, state, and local laws and regulations, including protection of the rights and safety of research participants, possible conflicts of interest and/or commitment, regulatory non-compliance, and scientific misconduct.

Proper Use of Company Assets

By using Highmark Health assets only for business-related purposes, we can deliver products and services more efficiently and cost effectively. Company assets include such things as equipment, including computers and phones, inventory, corporate funds, and office supplies as well as intangible items such as concepts, business strategies and plans, customer and patient information, financial data, intellectual property rights, and other business information. Highmark Health workforce members, officers, and members of its Board of Directors are prohibited from using company assets, property, information, or positions for personal gain.

Communications delivered via corporate systems are not private and are, as such, subject to management review and can be subpoenaed to serve as evidence in a court of law.

What are some examples of company assets?

- computer hardware and software
- copiers and scanners
- telephones and voice mail systems
- e-mail, Intranet and Internet access
- office supplies, and
- buildings and fixtures

Company assets may not be used for:

- personal gain
- solicitation of personal business
- harassment of any type
- sexually explicit material
- communications that are inappropriate, inflammatory, or derogatory
- illegal activity
- activity which violates corporate policies, procedures, or standards

Proper Use of Company Brand and Logos

Our brands and logos are vital to the Enterprise. For example, there are strict usage guidelines regarding the use of our brand in accordance with the Blue Cross and Blue Shield Association licensee rules as well as the Blue brand strategy. Contact the Law Department for guidance.

Accurate and Timely Records and Financial Reporting

Our patients and customers depend on Highmark Health to maintain and provide accurate information. Maintaining information and records accurately and completely is vital to the success of Highmark Health's businesses. A record is defined as a book, document, or any other data, regardless of the type or form. A record may be written or electronic including e-mails. Records may contain financial, clinical, operational, or safety data.

Documentation of accurate medical charts allows healthcare practitioners to provide high quality care to our patients. Our billing practices comply with all applicable federal and state payer requirements as well as all private payer contracts and agreements. We shall not submit claims that contain information known to be false or unsupported by the medical record.

We are obligated to accurately and truthfully document our work and to not make false or misleading oral or written statements regarding such work. Highmark Health workforce members, officers, and members of its Board of Directors are prohibited from taking any action to manipulate, mislead, coerce, or inappropriately influence any independent auditor engaged in an audit of the financial statements of any Highmark Health company.

When preparing source documents for financial transactions, it is important to provide accurate information so that costs can be allocated to the appropriate product lines. No payment may be approved or made with the intention or understanding that any part of the payment is to be used for a purpose other than company business. Failure to maintain accurate books and records may expose Highmark Health to significant fines, as well as civil and criminal penalties.

Contracts and subcontracts on government projects often require Highmark Health to submit various certifications. These contracts usually contain clauses wherein Highmark Health is

required to make affirmative representations about a variety of matters in addition to financial data, such as compliance with socioeconomic programs, contract specifications, environmental laws, and various procurement regulations. These certifications and representations are serious matters. Highmark Health relies upon the truthfulness and accuracy of the information it receives from its workforce members, vendors, contractors, and covered personnel when it submits these certifications.

It is a criminal offense to destroy records that are subject to a subpoena or government investigation. Records must be maintained in accordance with departmental and corporate records' retention guidelines and must not be destroyed before the prescribed retention period has expired or until threatened or pending litigation or government investigations are concluded. In addition, always check with your manager, Records Management, and/or the Law Department to determine if the records are the subject of a Legal Hold Notice. Records that are the subject of a Legal Hold Notice must continue to be preserved and may not be altered or destroyed without approval from the Law Department, even if the regular retention period that would otherwise apply to such records has expired.




QUESTION

I realized after the fact that I neglected to document something on a patient's medical record. Can I go back and add it?

ANSWER

Changes/additions can be made to the medical record only by using an addendum that is properly signed, dated, and timed.

DID YOU KNOW



...without proper documentation you cannot prove activities were performed?

...failing to keep documentation could subject Highmark Health to financial penalties?

...willful recording of incorrect information could be considered a false claim and you could be violating regulations within your licensure?

Fair Dealings

Customer and supplier relationships should be based on the cost and the quality of the products and services and should not be influenced by personal relationships. Those of us involved in the purchasing or bidding process must ensure that communications and representations made to prospective suppliers and customers are true and accurate.

In addition, we shall not take unfair advantage of our customers and suppliers through manipulation, coercion, misrepresentation of information, or abuse of privileged information.

We are obligated to guard against any behavior, including the personal giving or accepting of gifts, meals, or other gratuities that could be perceived as improperly intended to influence a business decision. These rules apply to the products and services Highmark Health buys as well as to products and services that Highmark Health provides.

Conflicts of Interest

Conflicts of interest may arise when outside personal interests, employment, or affiliations influence or create the appearance of influencing business decisions. Business affiliations and financial interests by immediate family members or by persons with whom a workforce member, officer, or member of the Board of Directors has a close personal relationship may also create a possible conflict of interest.

Workforce members, officers, and members of the Board of Directors must avoid situations where personal interests appear to conflict or actually conflict or compete with the interests of Highmark Health. For instance, it is a conflict of interest to work simultaneously for Highmark Health and a competitor of Highmark Health. In addition, certain affiliations such as employment or serving as a board member with a supplier, provider or customer may create a potential conflict of interest situation depending on the employee's position with Highmark

Health. An example of prohibited activity is selling products similar to those offered by Highmark Health for a competitor of Highmark Health.

The following are some basic details to remember about conflict of interest (COI) disclosures:

- Upon hire/appointment and annually thereafter, all covered persons and designated employees should disclose all potential or actual conflicts through the COI disclosure certificate. Workforce members who are not considered designated employees should notify the Integrity and Compliance Department of any known conflicts.
- Keep your COI disclosure statement updated at all times by reporting new disclosures as they occur.
- Direct any questions regarding potential or actual conflicts of interest to your supervisor, manager, or the Integrity and Compliance Department. The Integrity and Compliance Department can be reached via the Helpline (1-800-985-1056) or e-mail (Integrity@highmarkhealth.org).

To further ensure independent decision making, Highmark Health shall not directly or indirectly, including through any subsidiary, 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 member of the Board of Directors.

Do You or a Family Member Have:

- Another job outside of the company that could influence your judgment or decisions you make in your Highmark Health work?
- A financial interest or investment in a business outside of the company that may conflict with the interests of Highmark Health?
- Received an offer of a gift or entertainment from someone who has a business relationship with Highmark Health?

If you do, a potential conflict of interest exists. You should consult with the Integrity and Compliance Department.



QUESTION

I work in Finance, and I am pursuing a career as a licensed Sales Agent. I plan to seek a second job with an external insurance agency selling health insurance products, including competitor's products. Does this situation create a conflict of interest?

ANSWER

Yes. Your primary obligation is to Highmark Health. You also have access to confidential and proprietary information about Highmark Health products and customers. You will not be able to work for Highmark Health while also working in the agent position.

QUESTION

My brother owns an office supply company and is seeking to become a supplier to Highmark Health. Does this create a conflict of interest?

ANSWER

If you are involved in the supplier selection process or would be overseeing business transactions related to your brother's company if he becomes a supplier, a conflict of interest would exist. You should disclose the situation to your manager and remove yourself from the decision-making and oversight process.

Gifts, Gratuities, and Entertainment

We may not offer or accept any kickbacks, gifts, entertainment, gratuities, or anything of value from customers, patients, suppliers, providers, consultants, or government officials in exchange for an unfair competitive advantage.

As a general rule, gifts and entertainment of a nominal nature may be an acceptable business practice as a means to build corporate goodwill. However, offering or accepting gifts or entertainment that are not incidental to a business relationship, or might be perceived to be primarily intended to gain favor or to compromise a business decision, must be avoided.

Examples of inappropriate gifts and entertainment include:

- lavish dinners
- weekend trips
- cash or cash equivalents (such as gift cards/gift certificates, loans, stock/stock options), and honoraria for company related activities
- personal charitable or political contributions on behalf of the employee
- “Quid pro quo” offerings – gifts that are given or taken in return for something else
- Items that may be viewed as vulgar, pornographic, offensive, or in poor taste

All gifts, gratuities, and entertainment provided to any labor organization, officer, employee, agent, shop steward or other representative of a labor organization (even if the person is a relative or friend) must be reported through the appropriate internal reporting process so that the required LM-10 reports may be filed with the Department of Labor.

Additionally, local, state, and federal government agencies have strict rules describing if and when their employees can, or cannot, accept entertainment, meals, transportation, gifts, and other things of value from companies or people they regulate or with whom they do business. We are not permitted to give, or offer to give, to government employees any item, service, entertainment, meal, gift, or transportation, if giving or accepting it would violate applicable law or regulation. Similarly, we shall not make loans, guarantee loans, or make payments to or on behalf of any local, state, or federal government employees.

When deciding about accepting gifts or entertainment, ask yourself:

- How would accepting or giving the gift or entertainment appear to others at Highmark Health, my peers, or the general public?
- Will my giving or accepting of this gift influence what the company pays or is paid for its products, services, etc.?
- Should I give or accept this gift merely because “it always has been done this way”?
- Is this gift being offered or given because my position enables me to influence a Highmark Health decision in favor of the customer or supplier?
- By giving or accepting this gift, will I put myself, or appear to put myself, in a compromised position?
- Does the gift or item of value comply with the company’s Gift and Entertainment Policy?

If you have any questions about the Gifts and Entertainment Policy, please contact the Integrity and Compliance Department.

Vendor Gifting

Highmark Health manages our consulting, subcontractor supplier, and vendor relationships in a fair and reasonable manner, free from conflicts of interest, and consistent with applicable laws and good business practices. Highmark Health selects consultants, subcontractors, suppliers, and vendors on the basis of objective criteria, such as quality, technical excellence, price, delivery, adherence to schedules, service, and maintenance of adequate sources of supply. We make purchasing decisions on the basis of the vendor’s ability to meet our needs and not on personal relationships. Strict adherence to entity- specific policies that govern

vendor relationships is required. Furthermore, a gift may never be accepted if it is offered during a time where the individual or vendor providing the gift is seeking to do business with the company, involved in a bid for work, Request for Proposal, or in negotiations with the company, or near the time of a contract award or renewal by company.

Food and meals may only be accepted from a vendor if the food or meal is provided in connection with an accredited educational event. Meals or entertainment intended to serve all or part of a department, whether on or off-site, with no associated business purposes shall never be accepted.

If a vendor offers to sponsor training or educational events, which may or may not include payment for travel, express approval must be granted by management and the Integrity and Compliance Department. In addition, several conditions must be met. Please refer to the Gifts and Entertainment Policy for more information.



A vendor has offered to give an employee an Apple Watch in return for spending thirty minutes listening to their presentation. Employee wanted to know if it was within the Company's policy for him to accept the watch and then give it away to one of his employees as a recognition reward.

The Integrity and Compliance Department advised that since the gift is more than \$50 per source, per occasion it is not permissible. Additionally, the acceptance of the gift has the perception of influencing the employee's independence to influence or induce a business decision.

Patient Gifting

Workforce members, vendors, and contractors may not offer any gifts to patients unless such gift is of nominal value or unless express approval from the Integrity and Compliance Department is granted. Cash and cash-equivalents are never to be offered or accepted. In order to prevent an actual or perceived conflict of interest when offering or accepting gifts from patients, strict adherence to policies and procedures that govern activities related to gifts, gratuities, and items of value is required.

Gifts/Grants from Pharmaceutical or Device Manufacturing Companies

We will avoid arrangements with pharmaceutical or device manufacturing companies that would give the perception that any of our workforce members have a relationship with these companies that would influence clinical decision making, including prescribing patterns or the use of products. To that end, gifts and lunches without CME accreditation from

pharmaceutical manufacturers, biotechnology, medical device, and hospital equipment supply industry entities and their representatives are prohibited.

As it pertains to grant funding, the Office of Inspector General (OIG) has specifically cautioned against programs under which drug and device manufacturers offer grants to physicians or other practitioners for studies of prescription products when the studies are of questionable scientific value and require little or no scientific pursuit. Highmark Health workforce members should understand that payments may generally be considered improper if the payment is made to persons in a position to generate business for the donor company, related to the volume of business generated or exceeds the fair market value of any legitimate service provided to the donor company, or is unrelated to any service at all other than the referral of patients. To prevent a real or perceived conflict of interest, a pharmaceutical or device manufacturer contemplating making a grant or donation to Highmark Health should be referred to the Development Office or the Integrity and Compliance Department.

In addition to the standards outlined above, Highmark Health maintains policies and procedures that provide specific guidance around the offering and acceptance of gifts, gratuities and items of value. Strict adherence to this Code as well as the Gifts and Entertainment Policy is required; the Integrity and Compliance Department is available to assist workforce members, vendors, and contractors with any questions or concerns.



The Integrity & Compliance Department received an e-mail from an employee, asking if it would be appropriate for her to be a panelist at a conference for college students on non-academic careers in mathematics. Employee stated that she has also been asked to answer questions about actuarial work and what she does at Highmark.

The Integrity & Compliance Department advised the employee that she is permitted to accept the offer provided she has management approval. The employee was reminded that she is bound by the Company's Confidentiality Policy as well as any expenses incurred should be paid by Highmark.

Marketing and Advertising

Highmark Health uses marketing and advertising activities to educate the public and increase awareness of our products and services, and to provide information to the community.

Highmark Health will present truthful, fully informative, and non-deceptive information in these materials and announcements. All advertising materials content must be clear, honest, and fair.

The Centers for Medicare and Medicaid Services (CMS) imposes certain requirements related to the enrollment of Medicare beneficiaries in Medicare Advantage and prescription drug plans. In addition, CMS strictly regulates the marketing of these plans to beneficiaries. CMS requirements, applicable federal and state laws must be adhered to at all times.

Public Representation of Highmark Health

When communicating publicly, you must be cognizant of keeping your personal views separate from communications you make and actions you take on behalf of the company.

Communications with Government Officials

Employees who are part of personal membership groups (examples include, but are not limited to, local or state medical societies, specialty physician societies, pharmacist trade association, etc.) and are planning to participate in an advocacy action on behalf of that trade group must notify the Government Affairs Department. For example, an employee who is called to testify or write a letter in support or opposition of regulation is not permitted to represent the Company in any form unless expressly permitted by Government Affairs.

Additionally, any public communication on a public policy on behalf of the Company must be done under the direction of the Government Affairs Department. Employees are required to comply with the appropriate corporate policies around Communications with Government

Officials as well as all applicable federal, state, local, and corporate codes of conduct and requirements when representing the Company before government bodies and officials.

Interacting with the Media

To ensure that the views of Highmark Health are accurately depicted and appropriately and consistently represented in public, and to comply with applicable laws and corporate policies, procedures, and standards, all news media communications must be coordinated through Corporate Communications and Public Relations. You should not be interacting directly with the media on behalf of Highmark Health.



QUESTION

A friend who is a local newspaper reporter asked me about Highmark Health's plans for expansion in the area. How should I respond to him?

ANSWER

Only authorized individuals can communicate the company's official position on certain topics such as business strategy, financial performance and legal matters. You should refer your friend to Corporate Communications.

Participating in Social Media

Participation in social media on behalf of the company must be coordinated through Corporate Communications and Public Relations. When you speak, write, or participate in public forums or social media networks, do not associate Highmark Health with your own personal opinion. Employees participating in social networking on their own time must not publish content that is Highmark Health's property and/or could damage Highmark Health's business reputation or the reputation of its patients, customers, and providers.



Ted is an Emergency Department (E.D.) nurse at an Allegheny Health Network hospital. He is shocked by the number of patients that came into the E.D. today for the same reason. He doesn't go into detail, but still decides to post a few comments on social media about the fact that a lot of patients came into the E.D. with similar symptoms.

Despite the fact that Ted doesn't release the names of his patients and the fact that his comments on social media were made during off hours and on his own personal equipment, Ted's social media posts are still a violation of the Code of Conduct. Highmark Health enterprise employees should not be discussing work-related situations on any social media platform.

Endorsing Other Organizations or Products

As a general rule, Highmark Health directors, officers and workforce members shall not provide testimonial statements that could be used as an advertisement for suppliers or their products unless supported by Highmark Health. If you receive a request for an endorsement of an external entity, you must consult with the Integrity and Compliance Department before you respond to such request. For the purpose of this Code, an endorsement means any promotional message reflecting opinions or experiences of a third party's services or products that the third party could use for advertising purposes. References provided for suppliers in the ordinary course of business are not considered endorsements.

Gathering Information about Competitors

Obtaining public information about other organizations, including our competitors, through legal and ethical means such as public documents, public presentations, journal and magazine articles, and other published information is not unusual nor is it restricted. We are not permitted and should always avoid using improper means, such as misrepresentation, theft, bribery, or improper infiltration to gather competitive intelligence.

3



Protecting Highmark Health's Information



Highmark Health has strict standards with respect to safeguarding and proper use of information; failing to follow applicable safeguards – especially concerning member and patient information – exposes our company and our customers to risk, so we must all fully comply with the organization’s policies, procedures, and standards for the protection of confidential information. Member data or patient information may include information about co-workers, family members, relatives, notable people, or celebrities covered by one of our insurance plans or receiving care at one of our facilities. All of us are expected to strictly comply with company policies, procedures, and standards regarding data privacy, security, and appropriate use. We must safeguard all of the company’s Confidential Information, including, but not limited to Protected Health Information (PHI), Personally Identifiable Information (PII), Proprietary/Trade Secret Information, and Competitively Sensitive Information (CSI). All of us must strive to prevent improper use or disclosure of, or access to, that information. Even after our employment ends, certain obligations remain in effect, as outlined in the agreements we signed when we began employment.

All information that is maintained by the company is classified into three major categories: Public Information, Government Information, and Confidential Information. The information within each category is subject to specific data sharing requirements and approval processes.

1. Public Information

Public information represents all information created or received by the company that is generally found in the public domain and is not otherwise sensitive, confidential, classified, or secret. There are no special use or disclosure requirements regarding this information.

2. Government Information

Most of the information relating to government contracts is government property. Certain government contracts prohibit the use of government-owned information or data to further Highmark Health’s private business endeavors. Release of such data, even to our own subsidiaries, without the permission of the relevant government entity is not permitted.

3. Confidential Information

Confidential Information includes information either generated by the company or made available to the company for purposes of conducting its business operations. Confidential information is further subdivided into the following categories: financial information, human resources information, group customer account information, proprietary information, provider information, competitively sensitive information (CSI), protected health information (PHI) and personally identifiable information (PII), and personal data (under the EU General Data Protection Regulation (GDPR) and the California Consumer Privacy Act (CCPA)). Please refer to the Highmark Health Data Ethics, Policy, and Privacy Handbook for additional information regarding the different categories of information and the requirements for protection during use, storage, and release of information.

Intellectual Property and Research

Intellectual property or IP refers to intangible assets, rather than physical assets such as buildings, real estate and equipment. IP includes patents and potentially patentable inventions, copyrights, trademarks, and trade secrets. Highmark Health has entity specific policies and procedures which address IP and allow us to be competitive and constantly improve how we prevent, diagnose, and treat illness.

Highmark Health (or a third party sponsor, if applicable) owns all IP rights in all inventions and copyrightable works that any employees, contractors, or students of AHN: (a) creates with use of resources of Highmark Health entities; or (b) creates that relates to his or her regular duties at Highmark Health; or (c) develops under a federal funding contract or grant and that involves Highmark Health entities, including but not limited to their facilities; or (d) develops under any funding agreement with a third party sponsor and that involves Highmark Health entities, including but not limited to their facilities; or (e) develops using any philanthropic funds provided to Highmark Health entities.

Personal Use

Authorized users, defined as any person to whom Company has granted a unique user identification to gain access to the Company's systems, should only use Highmark Health assets for business related purposes. Highmark Health's information systems may never be used for personal gain or profit. The use of external personal e-mail accounts (e.g. Hotmail, Gmail) to conduct Company work or transmit Company information is prohibited.

No Expectation of Privacy

Authorized users have no legitimate expectation of privacy with regard to any communication that they create, receive, or store in Highmark Health's assets and systems, including, but not limited to e-mails, instant messages, and photographs. Authorized users should be aware that all information created or stored on the company's information systems, is the property of Highmark Health, and is subject to monitoring and auditing. The company cannot and does not guarantee the privacy or confidentiality of any personal (i.e., non-business-related) information stored on Highmark Health's information systems. Personal (i.e., non-business-related) information that is intended to remain private and/or confidential should therefore not be created or stored in Highmark Health's systems.

Monitoring

All activity conducted on the network by either authorized or unauthorized users is monitored. Highmark Health maintains the absolute right to monitor all information used by authorized users or unauthorized users for any purpose, and particularly to ensure proper working order, to assure appropriate use, and to maintain the security and integrity of the company's information. Highmark Health may retrieve the contents of any communication or file created or stored on the company's systems. Highmark Health may access any authorized user's files,

including archived material of present and former authorized users, without the authorized user's consent, for any purpose deemed appropriate by the company.

Acceptable Use of Electronic Communication and Information

The Company's information systems are the exclusive property of Highmark Health and are to be used for business purposes only. Highmark Health has established rules and guidelines that govern acceptable access to and use of Highmark Health information systems, which includes computers, mobile devices, cloud environments, network equipment, software applications, telephones and internet capabilities. The guidelines apply to any person whom Highmark Health has identified as an authorized user. An authorized user is any person to whom Highmark Health has granted a unique user ID so that the person can use Highmark Health's computer network equipment and, by virtue of his/her user ID, gain access to Highmark Health's network systems.

For example, authorized users must take steps to prevent unauthorized access to their accounts by logging off or locking their work-stations, or logging out of or securely locking business or clinical applications when their computer will be unattended, consistent with the corporate policy on Acceptable Use of Electronic Communication & Information. (14.05 Acceptable Use of Electronic Communication & Information).



QUESTION

Jack has been working a side job in the evening as a freelance website developer. Can he use Highmark Health assets to create his customer's websites, as long as it is in the evening and during non-work hours?

ANSWER

No, although Jack is working off-hours, Highmark assets are only to be used to conduct Highmark Health business and never should be used for personal gain or profit. In addition, all information created or stored on the company's information systems is property of Highmark Health.

Telework

Highmark Health has a Telework Policy which outlines the steps an individual must follow while performing their duties from a remote location. The decision to permit a telework arrangement is solely the prerogative and discretion of the company. The teleworker must at all times be in compliance with all company mandatory training and all company policies. Please refer to the Telework Policy 16.07 for additional information.



QUESTION

I am working from home and need to compare two documents but do not have two screens. Can I email some of my work documents to my personal email account so that I can print out the material and compare the information?

ANSWER

No. Company policy strictly prohibits using personal email or non-work-issued or approved computing devices to conduct company business as the security of such email accounts or computers is unlikely to be as secure as required by company policy. You should only use your work-provided devices or personal devices with Highmark Health's software and secure solutions. Never send documents to your personal email, never try to connect to printers outside of the office, and never use unsecure communication platforms.

QUESTION

Donna is attending a Zoom meeting from her home that has both screen sharing and video enabled to discuss a new state mandate with numerous individuals across the organization. During the meeting, Donna checks her email and begins to look at a message regarding a high dollar claim that was received and needs to be investigated. Were Donna's actions appropriate?

ANSWER

No, by searching for and reading her email, Donna has exposed the member's information to all of the attendees on the call. While screen sharing, it is important that you not search for documents or make visible other unintended materials to the participants. Additionally, it is important to make sure that your workspace is a separate space where all work materials can be kept secure, private, and out of sight. Remember that as you're working from home, you should continue to follow the same confidentiality protocols you would as if you were in the office.

Acceptable and Impermissible Content

Authorized users must exercise good judgment and professionalism when creating, editing, publishing, storing, or transmitting content on or from Highmark Health's systems. This applies to all systems and applications, including but not limited to e-mail, instant messages, video, audio, images, or pictures.

For more information, please review the corporate policy regarding acceptable use of electronic communication and information.

Privacy Resources

Additional information related to protecting Highmark Health's information can be found in the Highmark Health Data Ethics, Policy, and Privacy Handbook or by contacting the Privacy Department via privacy@highmarkhealth.org.

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Complying with Legal and Regulatory Requirements



The activities of Highmark Health and each of its workforce members, vendors, and contractors are to be carried out in accordance with applicable laws, rules, regulations, and contractual obligations. We are required to obey all applicable laws, including United States laws that have application outside of the United States and foreign laws that have application within the United States. Those who violate laws, rules, or regulations may be personally subject to individual, civil, or criminal liability as well as to disciplinary action. Our actions may also expose Highmark Health to civil or criminal liability or loss of business.

This Code provides general direction on a broad range of issues; however, it is not intended to address every law and regulation in existence or in the future that could impact our jobs or Highmark Health.

Because of the wide range of health care services we provide, separate policies and procedures specific to the various operations of physician practices and hospital operations have been adopted. These policies and procedures are more specific and may be more stringent than the standards set forth in this Code. For example, the Department of Health or Joint Commission may require specific procedures that are not addressed in this Code but are detailed in the separate policies and procedures maintained by your department.

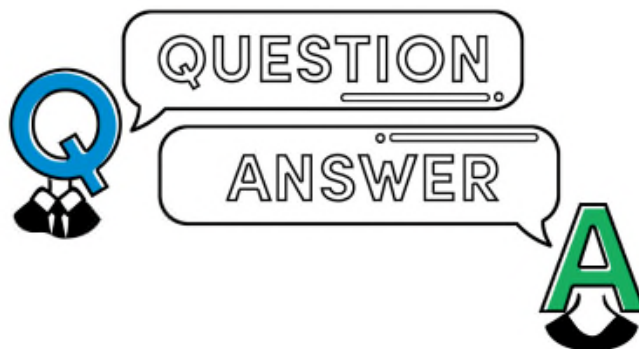
Competition and Antitrust Laws

The United States antitrust laws are designed to create a level playing field in the marketplace and to promote fair competition. Federal and state antitrust laws are intended to encourage such competition by prohibiting agreements that restrain trade, such as agreements by competitors regarding the price they will charge for their products. Other practices limiting competition, such as agreeing on product characteristics, dividing up markets, “rigging” bids for contracts, and agreeing to boycott competitors or suppliers, may also violate the antitrust laws.

Under antitrust laws, competitors may not make agreements on the prices they will charge for products or services, the territories in which each company will sell products, customers to whom each company will offer its products or services, the sale of only certain types of products or services, or the amount of any product each company will produce or offer for sale in the marketplace. In addition, competitors may not agree on the use or non-use of suppliers or on any contract terms and conditions except in the context of participating in a group purchasing organization that complies with all regulatory requirements.

Tying arrangements exist when one company conditions the sale of goods or services on the purchase of some other, unrelated good, or service. In certain circumstances, antitrust laws prohibit these arrangements. Seek guidance from the Law Department with any questions or concerns.

Members of trade associations and other industry groups are, by their very nature, competitors. You must be particularly sensitive about trade association activities that might be construed as leading toward an agreement concerning prices or services and should contact the Highmark Health Law Department for advice when you have questions or concerns.



QUESTION

What are examples of conduct that are considered unfair competition?

ANSWER

Unfair competition can include stealing or misusing a competitor's trade secrets; making false statements about competitors or their products or services; obstructing competitors' supply sources; and paying bribes to help increase company business or hurt a competitor.

QUESTION

When I attend trade shows and conferences, I usually have an opportunity to meet with representatives of competitors. Is it okay for me to talk to them?

ANSWER

Yes, but you must avoid conversations about inappropriate topics such as pricing, marketing plans, labor costs, and terms and conditions of sales to customers.

Federal False Claims Act

The Federal False Claims Act applies to the submission of claims by health care providers for payment by Medicare, Medicaid, and other federal and state health care programs. The False Claims Act is the federal government's primary civil remedy for improper or fraudulent claims. It applies to all federal programs, from military procurement contracts to welfare benefits to health care benefits.

The False Claims Act provides for monetary penalties to be imposed upon a healthcare provider or individual person for knowingly and willfully making false statements or representations in connection with a filing of a claim seeking reimbursement. In the Act, the definition of "knowingly" includes actual knowledge, deliberate ignorance, and reckless disregard for the truth. The False Claims Act, state law, and organizational policies protect workforce members, vendors, and contractors who report concerns to the government related to the submission of false claims or who file a False Claims lawsuit from being fired, demoted, threatened, or harassed by their employer.

Detecting and Preventing Fraud, Waste and Abuse

Highmark Health is committed to preventing, detecting, correcting, and reporting fraud, waste, and abuse committed either internally or externally against government entities as well as against the company. Fraud, waste, and abuse can include, but is not limited to, illegal or fraudulent conduct, waste of resources or funds, abuse of property or resources, mismanagement, or misappropriation of funds.

We value our reputation for integrity and require everyone to act in accordance with legal, ethical, and moral standards. Highmark Health provides information and training to all employees so that they have an understanding of fraud, waste, and abuse, the federal and state laws pertaining to the False Claims Act, and whistleblower protection under such laws. Highmark Health will investigate and, when required, report evidence of fraud, waste, or abuse to the proper authorities in a timely and accurate manner.

Definitions of fraud, waste, and abuse include the following:

What is Health care Fraud?

Fraud is generally defined as 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).

Health care fraud is most prevalent in the following areas:

- Fraudulent charting, coding phantom complications and other misrepresentations of care provided, and falsifying certifications of medical necessity, plans of treatment, and medical records to justify payment;
- Billing for services not rendered, which may include unbundling charges and up-coding;
- Waiving of Medicare/Medicaid patient deductibles and copayments when not based on patient financial need; and
- Soliciting, offering, accepting, or receiving a kickback in order to obtain a referral and /or diverting business from Highmark Health to a private enterprise.

What is Health care Waste?

Waste is overutilization of services or other practices that, directly or indirectly, result in unnecessary costs to the health care system. Healthcare waste occurs when there is no intent to deceive for a monetary gain but there is inappropriate utilization and/or inefficient use of resources. Example: A provider's belief that every patient should receive an x-ray every time they have an appointment.

What is Health care Abuse?

Abuse includes actions that may, directly or indirectly, result in unnecessary costs to the company and/or federal or state government. Abuse involves receiving payment for items or services when there is no legal entitlement to that payment but the provider has not knowingly or intentionally misrepresented facts to obtain payment. Health care abuse may result in one or more of the following:

- Unnecessary costs to the healthcare system, including the Medicare and Medicaid programs;
- Improper payment for services;
- Payment for services that fail to meet professionally recognized standards of care; or
- Services that are medically unnecessary.

Emergency Medical Treatment and Labor Act (EMTALA):

We comply with the provisions of Emergency Medical Treatment and Labor Act (EMTALA), which means:

- We provide a medical screening examination and (if necessary) stabilizing treatment to all patients who come to a hospital for emergency treatment, regardless of their insurance or their ability to pay.
- In an emergency situation or if the patient is in labor, we do not delay medical screening and necessary stabilizing treatment to seek financial and demographic information.
- We do not admit or discharge patients with emergency medical conditions based simply on their ability (or inability) to pay or any other discriminatory reason.
- We only transfer patients with emergency medical conditions to another facility, in compliance with state and federal requirements, and EMTALA policies.

Controlled Substances

Certain licensed practitioners employed by Highmark Health are registered to purchase, acquire, and dispense narcotics and other controlled substances. Improper use of these substances is illegal and extremely dangerous. Highmark Health complies with all federal and state laws regulating controlled substances.

Access to controlled substances is limited to persons who are properly licensed and who have express authority to handle them. No health care practitioner or researcher may dispense controlled substances except in conformity with state and federal laws and the terms of the practitioners' license.

The unauthorized manufacture, distribution, use, or possession of controlled substances by Highmark Health workforce members, vendors, or contractors is strictly prohibited. Any workforce member, vendor, or contractor who know of any unauthorized handling of controlled substances should provide such information immediately to his or her supervisor or the Integrity and Compliance Department.

Anti-Kickback Statute

The Anti-Kickback Statute makes it a crime for any person to knowingly and willfully offer or pay any remuneration, directly or indirectly, overtly or covertly, in cash or in kind, to induce a person to make referrals for services that may be covered by a federal health care program or to purchase, lease, order or arrange for or recommend purchasing, leasing, or ordering any services that may be covered by a federal health care program. The Anti-Kickback Statute also prohibits any person from soliciting or receiving any remuneration in return for

making referrals for any services covered by a federal health care program or purchasing, leasing, ordering, or arranging for or recommending purchasing, leasing, or ordering any service covered by a federal health care program.

Stark Law

The Stark Law prohibits a physician from making referrals to an entity for the furnishing of Designated Health Services (“DHS”), which include inpatient and outpatient hospital services, clinical laboratory, and radiology if the physician or an immediate family member has a financial relationship (ownership or compensation) with the entity (unless an exception applies). Further, the entity may not submit a claim to or bill for DHS furnished services pursuant to a prohibited referral, and no payment may be made under Medicare for DHS furnished services pursuant to a prohibited referral.

Because these laws and the accompanying safe harbor provisions are complex, leaders must follow Highmark Health and its subsidiaries’ policies when contracting with or offering/accepting anything of value to/from a physician or his/her immediate family member. You should refer any questions or concerns regarding a specific transaction to the Highmark Health Law Department.

Export Restrictions

Employees involved with the export or re-export of goods and services must be familiar with and follow the regulations of those countries where any subsidiary conducts business. Employees are responsible for knowing with whom they are transacting business and must not facilitate business with entities or individuals specifically prohibited by law, or with countries that may fall under comprehensive trade embargoes or economic sanctions. Employees should seek guidance from the Highmark Health Law Department concerning export or re-export of goods and services, including transactions involving a foreign subsidiary, if they have any questions or concerns.

Anti-Boycott

Any subsidiary that conducts international business must also comply with the anti-boycott requirements of the Export Administration regulations. These anti-boycott requirements prohibit certain conduct and actions that further boycott or restrict trade practices not supported by the United States, such as agreeing to boycott terms and conditions in a transaction. Generally, we are required by law to report a request to participate in an unapproved boycott to the United States government.

Insider Trading

Although Highmark Health is not a publicly traded company, AHN has issued publicly traded bonds and as a result, members of the Board of Directors, officers, and employees are

obligated to comply with certain insider trading laws. In the course of conducting business, we may become aware of non-public information about Highmark Health that may be useful to an investor's decision to buy or sell AHN bonds. If you become aware of such information, you may not use this information to buy, sell, or retain stocks, bonds or securities of that company. You also may not disclose this information to anyone outside of our company and, within our company, you may discuss the information only with those who need to know it in the course of their duties for our company.



QUESTION

What is considered “inside information”?

ANSWER

Inside information is positive or negative information about a company not yet released to the public that a reasonable investor would find useful in determining whether to buy, sell, or hold a stock, bond or security. Examples of inside information about a company may include:

- Financial results or forecasts
- Change in dividends
- Major new contracts or contract cancellations
- Litigation involving the company
- Change in the company's senior management
- Possible mergers, acquisitions, or joint ventures

Copyright and Trademarked Materials

It is critical that we understand and comply with the laws governing the use of intellectual property, including those regarding copyrighted and trademarked materials. Intellectual property generally consists of documented knowledge or creative ideas that have a monetary value and are protected under copyright, patent, service mark, trademark, or trade secret laws.

A copyright is an intangible right of the creator of certain works such that he/she is the only individual allowed to copy the work, or a significant portion of it. In general, we may not copy or distribute, electronically or otherwise, any copyrighted materials unless prior written permission is obtained from the copyright owner. A copyrighted work can usually be recognized by the symbol ©, date of publication, and the name of the copyright owner displayed prominently on the work.

The term “trademark” includes any word, name, symbol, or device or any combination thereof adopted and used by an individual or a corporation to distinguish its goods from those sold by others.

Highmark Health also licenses computer software from a variety of suppliers. Most of our software license agreements contain restrictions regarding the use of the software. This means that we are prohibited from copying, downloading, or reproducing the software for personal use. In addition, Highmark Health is prohibited from creating or loading any unauthorized copies of software programs.

All workforce members, vendors, and contractors are prohibited from copying, downloading, or reproducing software for personal use.

Political Activities

Federal law restricts the use of corporate funds in connection with federal elections. There are similar laws in many states governing state and local elections. Highmark Health is generally prohibited from using company resources or facilities to support fundraising activities of candidates for office.

Examples of activities prohibited to be performed by employees running for elected office as a candidate or on behalf of a political candidate include, but are not limited to:

- Participating in or intervening in, including the publishing or distributing of statements, any political campaign on behalf of or in opposition to any candidate for public office during working hours
- Using corporate funds in connection with federal elections
- Using Highmark Health corporate funds to directly or indirectly contribute to individual political campaigns or to political parties
- The use of company resources, including workforce members’, vendors’, and contractors’ time, or facilities to support or oppose any candidate for office
- Examples of activities prohibited to be performed by employees running for elected office as a candidate or on behalf of a political candidate include, but are not limited to:
 - Use of Highmark Health’s office supplies, facilities, or food services;
 - Purchases of prizes by Highmark Health for use or consumption in a fundraiser; or
 - Calling or e-mailing potential supporters or voters from Highmark Health assets.

Highmark Health will not:

- Reimburse workforce members, vendors, and contractors for any personal contributions and/or activities described above.
- Permit workforce members, vendors, and contractors to use their position to coerce another member of the workforce to work for a candidate or political organization, or to make personal contributions to a party or candidate.
- Allow political statements to be made on Highmark Health letterhead or in any manner which leads the reader to believe that the statement is an official statement of Highmark Health.

Highmark Health recognizes everyone's freedom of choice regarding political matters. As individuals, employees may, of course, choose to participate in the political process on their own time and in the manner they choose. Employees who are personally involved in the political process must clearly identify that their actions are personal and not those of Highmark Health or its family of companies. Employees must avoid conflicts of interest when serving in public office by excusing themselves from any political matters involving Highmark Health and its affiliates.

Highmark Inc. operates a political action committee. The law permits corporations to establish such committees, usually referred to as PACs. All exempt level employees of Highmark Inc. and its federally-taxable subsidiaries and affiliates are eligible to join the PAC and make voluntary contributions to it by payroll deduction or otherwise. Highmark PAC also accepts voluntary contributions from the exempt level employees of Highmark Health and its federally tax-exempt subsidiaries and affiliates.

Funds contributed to the PAC are permitted to be used for contributions to candidates for elected office. Other than through the PAC, no contribution to federal candidates for elected office can be made on behalf of Highmark Inc. Highmark Inc. makes corporate contributions to state and local candidates and campaign committees where permissible. Contact the Government Affairs Department if you have any questions regarding political activities.



QUESTION

I volunteer in the local campaign office for a political candidate. Is this okay?

ANSWER

Yes. As long as your activities are done on your own time, at your own expense, and outside of Highmark Health, this is permissible.

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Complying with Government Program Requirements



Certain Highmark Health subsidiaries are government contractors under both federal and state contracts. In the course of your employment you may directly or indirectly perform services or work related to one or more of these contracts.

When performing services related to one of these contracts, we must be cognizant of any additional requirements and obligations imposed by the government. It is Highmark Health's policy to go beyond the minimum requirements for legal and regulatory compliance to avoid even the hint of any impropriety. In this regard, it is critical that everyone recognizes the applicable legal and regulatory obligations and that these obligations apply not only to employees in the dedicated government units but to all employees who support these government contracts.

Government Investigations and Interacting with Government Personnel

Appropriate handling of government investigations is very important, both for Highmark Health and its workforce. Virtually all the laws regulating Highmark Health's business—including antitrust, insurance, and government contracting laws—contain criminal and civil penalties. Violation of these laws can result in criminal penalties not only for the company but also for individuals. It is Highmark Health's policy to provide full cooperation with any government agency responsible for audits, investigations, or corrective actions. If you are contacted by a government agency regarding an investigation related to Highmark Health, you must immediately contact the Highmark Health Law Department.

Government officials rely upon the accuracy of oral and written statements made by Highmark Health and its employees. It is a violation of the law for any individual to knowingly make a false or misleading statement to a government official or representative, including auditors conducting audits on behalf of the government, in connection with a government program. In every instance, it is the obligation of Highmark Health and its employees to provide accurate and complete information to the government.

Interacting with Foreign Government Personnel

Corruption can distort the marketplace and erode public confidence. There are United States laws that address this concern. Specifically, the Foreign Corrupt Practices Act (FCPA) imposes criminal penalties on American enterprises that bribe officials of foreign governments. The FCPA prohibits payments of (including promises to pay, or authorizations to pay) money, gifts, or anything of value to officials of foreign governments in order to obtain or retain business. Payments or gifts to a third party while knowing that all or part of the money or gifts will be offered to a foreign government official are also prohibited.


Highmark Health is committed to conducting ethical business practices free from unfair inducement by ensuring that its employees are aware of their responsibilities whenever conducting business in the United States and throughout the world. Those employees with a responsibility in international operations must be familiar with, and comply with, the FCPA and with similar laws that govern our operations in other countries in which our company conducts business. If there is any uncertainty, you should consult the Highmark Health Law Department for guidance.

Dealing with Excluded or Ineligible Persons

Under certain contracts with the federal and state governments, as well as a condition for participation in federal health care programs such as Medicare, Medicaid, or Tricare, Highmark Health is prohibited by law or contractual provision from contracting or doing business with any person or entity that is currently debarred, suspended, excluded, proposed for debarment, or declared ineligible to perform work under any government contract or subcontract. In addition, AHN entities may not employ or accept medical orders from individuals or entities who are excluded from participation in federal or state health care programs.

Highmark Health will not knowingly employ any individual who has been convicted of a criminal offense involving government business, is listed by a federal or state agency as suspended, debarred, excluded, proposed for debarment or suspension, or is otherwise excluded from federal or state program participation, for the purpose of fulfilling its obligations under certain contracts with the federal and state governments.

**DID
YOU
KNOW**



Any individual who is under federal exclusion or debarment cannot be employed by Highmark Health for work under its federal government contracts or order health care services reimbursable by federal or state health care programs?

Bidding on Government Contracts

When bidding on or negotiating federal or state contracts, Highmark Health is subject to specific legal requirements. The Federal Procurement Integrity Act dictates certain business conduct for companies seeking to obtain work from the federal government. During the bidding process, we may not offer to discuss employment or business opportunities at Highmark Health with agency procurement officials; offer or give gratuities or anything of value to any agency procurement official; or, seek to obtain any confidential information about the selection criteria before the contract is awarded.

Another federal law, the Truth in Negotiations Act, requires Highmark Health to certify cost and pricing data submitted to the government as “current, accurate, and complete.” It is Highmark Health’s policy to ensure that only accurate and complete information is provided to the government.

Procurement Compliance

Highmark Health's subsidiaries and affiliates who are government contractors must adhere to a variety of government procurement laws and regulations such as prior notification and approval when amounts exceed certain dollar thresholds or when certain subcontracting requirements are met. These entities must follow certain procedures to help ensure that we are paying the most appropriate costs for goods and services. In addition, Highmark Health's subsidiaries and affiliates must make sure that its contracts to procure goods and services for a government contract do not present actual, potential, or apparent conflicts of interest. To comply with the government's diverse and complex procurement rules, Highmark Health's subsidiaries and affiliates' procurement policies must be followed for all procurement activities. Procurement activities also must often be conducted on a competitive basis based on such factors as functionality, cost, quality, and any other relevant business factors.

With regard to fulfilling its obligations under its government contracts, Highmark Health's subsidiaries and affiliates will not knowingly enter into a contract with an entity that has been convicted of a criminal offense involving government business, listed by a federal agency as suspended, debarred, excluded, or proposed for debarment or suspension, or otherwise excluded from federal program participation.

Remember: All supplier and sourcing needs must be handled by Procurement.

Making Claims, Statements, and Representations to the Government

Contracts and subcontracts on government projects often require Highmark Health to submit various certifications. These contracts usually contain clauses wherein Highmark Health is required to make affirmative representations about a variety of matters in addition to financial data, such as compliance with government programs, contract specifications, environmental laws, and various procurement regulations. These certifications and representations are serious matters. Highmark Health relies upon the truthfulness and accuracy of the information it receives from its employees and covered personnel when it submits these certifications.

It is a violation of federal laws to knowingly make fraudulent claims or misleading statements to the government or to alter documents being processed in connection with claims against with or the government. A violation of these federal laws can lead to severe civil and criminal penalties against the individual and the company, and can lead, among other things, to sanction, debarment, or exclusion penalties.

It may also be a potential violation of federal law if an employee makes little or no effort to validate the truth and accuracy of his or her statements, representations, or claims, or otherwise acts in a reckless manner as to the truth even if the individual is unaware that the data or information is false, or deliberately avoids finding out whether the statements, representations, or claims are true or false.

Government officials rely on the accuracy of verbal and written statements of Highmark Health and its employees. These "statements" could include formal certifications, reports, or responses given during audits and even to conversations with government representatives. In

every instance, it is the obligation of Highmark Health and all of its employees to provide accurate and complete statements to the government.

Allocating Appropriate Costs to Government Contracts

A cost that is a legitimate business expenditure for Highmark Health's subsidiaries and affiliates may be considered an unallowable cost under our contracts with the federal government. Under some government contracts, Highmark Health's subsidiaries and affiliates must certify that our cost submissions do not contain any unallowable costs.

We must charge all direct and indirect costs accurately to the appropriate contracts in accordance with the guidelines specified under the respective contract. Inflating time reporting or individual or department workload statistics is strictly prohibited as these statistics are often used as the basis to determine the cost allocation.

Hiring Former and Current Government Employees

The federal government regulates the employment activities of current and former government employees in order to restrict a company from gaining an unfair competitive advantage by hiring a current or former government employee. The terms of these restrictions vary according to the employment status and function of the government employee and what the employee's role will be at Highmark Health. These restrictions can last for varying periods of time from one year to a lifetime.

It is Highmark Health's policy to comply with all laws concerning the recruitment and employment of former and current government employees, either as employees or consultants. Before entering into employment discussions or negotiations with former or current federal, state, or local government employees, legislators, or members of their immediate families, whether initiated by you or them, seek approval from Highmark Health Human Resources and the Highmark Health Law Department.

Mandatory Disclosure Requirement

Contractor business ethics compliance program and disclosure requirements obligate federal contractors to disclose certain violations to the government. These provisions state that the agency suspension and debarment official may suspend or debar a contractor if it is determined that there was a knowing failure by a principal of the contractor to timely disclose to the government, in connection with the award, performance or closeout of a contract or subcontract thereunder, credible evidence of (a) a violation of federal criminal law involving fraud, conflict of interest, bribery, or gratuity violations in Title 18 of the U.S. Code; (b) a violation of the civil False Claims Act; or (c) significant overpayments on the contract.

As federal government contractors, certain Highmark Health subsidiaries are obligated to timely disclose to the government, in writing, information regarding credible evidence of the

conduct described above. For the purpose of this disclosure requirement, the term “principal” means an officer, member of the board of directors, owner, partner, or a person having primary management or supervisory responsibilities within a business entity (e.g., general manager, head of subsidiary, division, or business segment, and similar positions).

Prompt disclosure of all known facts and circumstances is to be made to the Integrity and Compliance Department to enable Highmark Health to properly assess such information and to determine whether it has an obligation to further investigate and/or make a disclosure to the government.

6



**Maintaining a Safe,
Respectful, and
Dignified Working
Environment**



Each of us must treat our customers, business partners, and fellow employees with respect and dignity and hold each other and ourselves accountable for our actions and behavior. Highmark Health is committed to maintaining a safe, positive, and healthy work environment. Working in an atmosphere of honesty and respect enhances our relationships with each other and those with whom we do business.

One of the guiding principles of our company is to provide equal employment to qualified individuals regardless of their race, age, sex, religion, national origin, ancestry, creed, sexual orientation, mental or physical disability, veteran status, or any other status or condition protected by law.

Differences in backgrounds that each individual brings to Highmark Health are to be respected, as it is those differences that bring value and diversity to the company. We are expected to treat all people we encounter with professional respect and courtesy, regardless of their position, age, race, sex, disability, or other differences and we should expect the same level of respect in return whether they are our co-workers, patients, customers, or suppliers.

Diversity and Inclusion

Highmark Health is committed to diversity and the creation of an inclusive work environment where everyone is valued for both their similarities and their differences. Highmark Health respects the unique attributes and diverse thinking of each employee, and recognizes and embraces the many diverse perspectives and life experiences that each individual brings to the workplace. A diverse and inclusive workforce ensures Highmark Health's capacity to serve all communities and to reach new and emerging markets.

Equal Employment Opportunity

Current and prospective workforce members, vendors, and contractors can be assured that our work environment promotes fairness and equal opportunity in the employment process. Equal opportunity is provided in all aspects of the employment relationship, including recruitment, hiring, work assignment, promotion, transfer, termination of employment, wage and salary administration, and selection for training.

Workforce Members and Applicants with Disabilities

Our company provides a work environment that helps prevent discrimination against qualified individuals with disabilities with respect to any offer, condition, or privilege of employment. Applicants and employees are assured that all information regarding a disability will be kept confidential.

Harassment-Free Work Environment

All Highmark Health workforce members and visitors must be treated with professional respect and courtesy. Harassment, which may be of a sexual, physical, written, or verbal

nature, will not be tolerated from employees, management personnel, co-workers, customers, outside business invitees, or visitors.

Safe and Healthy Environment

We have the right to a safe and healthy work environment, free of illegal drugs, alcohol, and workplace violence. Highmark Health will not tolerate actions or threats by anyone who disrupts business activities or places our patients, customers, workforce members' vendors, contractors, suppliers, or visitors at risk of harm. Possession of weapons, firearms, firearm ammunition, firearm replica, or firearm components on owned or leased company property, regardless of whether the workforce member, vendors, and contractors possesses a license to carry a concealed weapon, is prohibited (unless required by their position as an AHN Police Officer). If you have a concern for your own or someone else's safety, please contact the Corporate Security and Employee Safety Department. Workplace safety also extends to our physical work environment. It is, therefore, important that you identify and promptly report any condition that could create a physical hazard in your area to the Corporate Security and Employee Safety Department.

Sustainability

Our commitment to a healthy environment extends beyond the walls of our buildings. At Highmark Health, we know that creating a healthy environment helps to create healthier people. We are committed to being responsible corporate citizens by being active in the communities where we do business. We strive to make our communities stronger and healthier places to live through employee volunteerism, corporate philanthropy, and eco-friendly business practices to protect the environment.



QUESTION

I overheard a co-worker make an off-color joke that I found offensive. I am also pretty sure the joke made my coworker very uncomfortable too. What should I do?

ANSWER

Notify your manager, Employee Relations, or the Integrity and Compliance Department. Our company strives to maintain a professional working environment. Workforce members should refrain from making comments that could be perceived as offensive.

7



Seeking Advice and Reporting Concerns Without Fear of Reprisal



What Types of Suspected Misconduct Should be Reported?

Some examples are:

- submitting false timesheets or expense reports
- identifying an overpayment
- lying or not cooperating during an investigation
- an ethical dilemma or suspected violation of the code
- policy violations

Personal Obligation to Report

It is important to remember that the designation of a Compliance Officer and the existence of an Integrity and Compliance Department in no way diminishes your individual responsibility to comply with laws and regulations, the integrity process, the Code, and related policies and procedures. In carrying out our day-to-day business activities, we need to be sensitive to situations that could lead us or others to violate the Code or other Highmark Health policies. If you are aware, or become aware, of a potential or actual violation of the Code, you must report it to management or the Integrity and Compliance Department as soon as possible.

If the potential or actual violation of the Code involves your immediate supervisor, you must report it to the next highest level of management or the Integrity and Compliance Department. Failure to report a violation of the Code may subject you to disciplinary action.

Disciplinary or corrective action in response to substantiated allegations is an integral part of the Highmark Health Integrity Process. Knowledge of a possible violation of a law that is not reported may result in disciplinary action or termination of a contractor or vendor business relationship.

You are expected to fully cooperate with inquiries made by the Compliance Officer or the Integrity and Compliance Department and respond completely and truthfully to any and all questions. You must refrain from discussing such inquiries with others to protect ourselves, the accused, and the integrity of the investigation.

Good Faith Reporting

Good Faith Reporting is raising an issue or concern in a timely manner with no ulterior motive; or raising an issue or concern that could be a violation of the Code, law, regulation, or Highmark Health policy.

Good Faith Reporting is not making frivolous reports to get someone in trouble or reporting something only when you are facing disciplinary action.



QUESTION

I saw my supervisor engaged in an activity that is against the principles of the Code. The matter does not concern me personally. What should I do?

ANSWER

Even though the matter does not concern you personally, you have an obligation to report any suspected violations to the next highest level of management and/or to the Integrity and Compliance Department. You may use the anonymous Integrity Helpline or other confidential means to report this concern. Highmark Health maintains a reprisal-free environment and has a policy of non-retaliation and non-intimidation to encourage employees to raise ethical or legal concerns in good faith.

Corporate Reporting Requirements

All employees must report any evidence of a violation of a law or regulation as well as breach of fiduciary duty or similar violation by Highmark Health, its employees, subsidiaries, affiliates, or agents to either the Chief Legal Officer or the Chief Compliance Officer.

All reports of suspected violations, including all submissions to the Integrity Helpline, will be promptly reviewed by the Integrity and Compliance Department. A thorough investigation will be conducted and an appropriate response will be implemented. In appropriate instances, Highmark Health may report the matter to governmental agencies for further investigation.

Protection from Retaliation and Intimidation

Highmark Health maintains a reprisal-free environment and has a policy of non-retaliation and non-intimidation to encourage workforce members, vendors, and contractors to raise ethical or legal concerns in good faith. Retaliation or intimidation against those who, in good faith, report wrongdoing to management, the Integrity and Compliance Department, or a government agency is prohibited. Management must refrain from speculating or questioning


individuals in an effort to determine who might have reported a possible violation or cooperated in an investigation. Such behavior can give the appearance of retaliation or can be perceived as intimidation by an individual who has reported or is thinking of reporting a matter to the Integrity and Compliance Department.

The federal and state False Claims Acts also protect anyone who files a False Claims lawsuit from being fired, demoted, threatened, or harassed by their employer for filing the suit. Additional employee whistleblower protections were established under the Deficit Reduction Act of 2005 and the National Defense Authorization Act for Fiscal Year 2013. Similar to the False Claims Act, we cannot discharge, demote, or otherwise discriminate against an employee as a reprisal for disclosing information (except for classified information) that the employee reasonably believes is evidence of any of the following: a gross mismanagement of a federal contract or grant; a gross waste of federal funds; an abuse of authority relating to a federal contract or grant; a substantial and specific danger to public health or safety; or a violation of law, rule, or regulation related to a federal contract (including competition for or negotiation of a contract) or grant. Employees who disclose these types of information to the following persons or entities are protected: a member of Congress or a representative of a committee of Congress; an Inspector General; the Government Accountability Office; a federal employee responsible for contract or grant oversight or management at the relevant federal agency; an authorized official of the Department of Justice or other law enforcement agency; a court or grand jury; or their management or the Integrity and Compliance Department, who has the responsibility to investigate, discover, or address misconduct.

Pursuant to the Defend Trade Secrets Act of 2016, an individual may not be held criminally or civilly liable under any federal or state trade secret law for the disclosure of a trade secret that: (a) is made in confidence to a federal, state, or local government official, either directly or indirectly, or to an attorney; and solely for the purpose of reporting or investigating a suspected violation of law; or (b) is made in a complaint or other document that is filed under seal in a lawsuit or other proceeding.

Further, an individual who files a lawsuit for retaliation by an employer for reporting a suspected violation of law may disclose the employer's trade secrets to the attorney and use the trade secret information in the court proceeding if the individual: (a) files any document containing the trade secret under seal; and (b) does not disclose the trade secret, except pursuant to court order.

DID YOU KNOW



Highmark Health has a non-retaliation non-intimidation policy to assure no one will be subject to any adverse action if they report in good faith.

All reports will be promptly investigated and when necessary, appropriate actions will be taken to reduce the potential for reoccurrence and to ensure ongoing compliance.



COMMUNICATE

You should speak with your supervisor or manager or contact the Integrity and Compliance Department by any one of the following methods:



VISIT

Highmark Health
Integrity and
Compliance
Department
Fifth Avenue Place
120 Fifth Avenue
Suite 1818
Pittsburgh, PA
15222

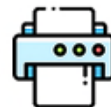


MAIL

U.S. Post Office Box

Highmark Health
Integrity and
Compliance
Department
P.O. Box 22492
Pittsburgh, PA
15222

Interoffice Mail
FAP 1818



FAX

1-412-544-2475



CALL

Anonymous
Reporting Helpline
(Toll Free: 24
Hours-a-Day; 7
Days-a-Week)
1-800-985-1056

AHN workforce
should call:
1-877-867-7325



EMAIL

[integrity@
highmarkhealth.org](mailto:integrity@highmarkhealth.org)

[integrity@
highmark.com](mailto:integrity@highmark.com)

[compliance@
ahn.org](mailto:compliance@ahn.org)



MESSAGE

**Secure Message
Options Can Be
Found On These
Sites:**

highmarkhealth.org

highmark.com

ahn.org

When contacting the Integrity and Compliance Department

- You will be treated with dignity and respect
- You do not have to give your name
- No caller ID is used when calling the toll-free Integrity Helpline number
- All matters will be handled with the appropriate level of confidentiality
- Your questions or concerns will be promptly reviewed and addressed
- You will be protected from any form of retribution or intimidation



If you choose to make an anonymous report, you should provide enough information about the situation to allow us to properly investigate it. If you do not provide enough details, our ability to pursue the matter will be limited.

All reports will be promptly investigated and when necessary, appropriate actions will be taken to reduce the potential for reoccurrence and to ensure ongoing compliance. Depending on the circumstances, corrective actions may include changes in business processes, employee coaching, or disciplinary actions.

All matters will be handled with the appropriate level of confidentiality. However, if a matter necessitates the involvement of law enforcement, information may be shared as required by law.

In order to receive status updates on the matter or to provide additional information, you are encouraged to re-contact the Integrity and Compliance Department, referencing the matter you have reported.

What is Expected of You?

This Code is intended to provide guidance on how you can support Highmark Health's commitment to integrity and a strong business culture. You play a vital role in Highmark Health's success, regardless of your job responsibilities or position within the Company. If you detect a problem or suspect someone is acting inappropriately, help us maintain our values and culture by reporting it immediately.

Amending the Code

Highmark Health reserves the right to modify the Code at any time when determined necessary. The most current version of the Code is always available on Highmark Health's websites.

DEFINITIONS

Affiliation(s) / Affiliated Person means any paid or non-paid position as officer, employee, board member, volunteer, or member, of any other governing or advisory body; trustee of any entity; a consulting or other contractual arrangement; or any other significant relationship

Conflict of Interest arises when a person in a position of authority over an organization, such as an officer, director/trustee, or manager, may benefit financially from a decision he or she could make in such capacity, including indirect benefits such as to family members or businesses with which the person is closely associated. In these circumstances, conflicts arise between a person's private interests on the one hand, and his fiduciary and professional obligations to the Corporation (and the community it serves) on the other hand.

Copyright is an exclusive right to reproduce, distribute, create derivative works from, and otherwise disseminate a work of authorship that is fixed in a tangible medium. Copyright does not protect ideas, but rather the expression of ideas in a fixed form of such as books, papers, reports, educational materials, recorded media, software code, etc. Securing a copyright does not require any formal action or examination by the government. However, registration may be required to stop others from infringing on a copyright.

Covered Persons includes any Director or Officer, any member of any committee of the Board of Directors, any key employee as designated by the Chief Legal Officer of Highmark Health, and any person who has authority to act on behalf of the Board of Directors.

Creator is any employee, contractor, or student of a Highmark Health Entity.

Designated Employee includes employed physicians and non-employed physicians serving in an elected or appointed leadership position, supervisors and above, persons with purchasing or contracting authority including procurement department employees and committees which may influence purchasing decisions, and any other employees as designated by the Compliance Department.

Designated Health Services ("DHS") includes:

1. Clinical laboratory services
2. Physical therapy services
3. Occupational therapy services
4. Outpatient speech-language pathology services
5. Radiology and certain other imaging services
6. Radiation therapy services and supplies
7. Durable medical equipment and supplies
8. Parenteral and enteral nutrients, equipment, and supplies
9. Prosthetics, orthotics, and prosthetic devices and supplies
10. Home health services
11. Outpatient prescription drugs
12. Inpatient and outpatient hospital services.

Family Member includes: spouse, domestic partner, parents (including step-parents), grandparents, parent-in-law, siblings (whole, step or half), children (natural or adopted), step-children, grandchildren, great-grandchildren, and the spouses of siblings, children, grandchildren and great-grandchildren. This also includes anyone living in the same residence as the Director, officer or employee, anyone who is financially dependent on the Director, officer or employee; and/or, anyone whose investments are controlled by the Director, officer or employee.

Intellectual property or IP refers to intangible assets, rather than physical assets such as buildings, real estate and equipment. IP includes patents and potentially-patentable inventions, copyrights, trademarks and trade secrets.

Invention is a process, machine, article of manufacture, or composition of matter. To receive a patent, the invention must be new, non-obvious, useful, and it must cover patent-eligible subject matter.

Ownership Interest means any ownership or investment interest that is equal to or more than 5% of the total ownership of an entity including but are not limited to stock, limited liability company membership interests, securities, options, warrants, debt instruments (including loans and bonds), private investment, partnership, proprietorship, or rights to acquire any of the foregoing; provided, however, that the term shall not include interests in mutual funds.

Patent is a government-issued document that provides the patent holder with a right to prevent others from making, using, or selling a patented invention for a limited period of time.

Trademark is an identifier of source of a product or service, and is often referred to as a "brand". Trademark rights arise through use in commerce and/or registration with the United States Patent and Trade Mark Office (USPTO).

Trade secret is anything that is valuable to a business and not known to others outside of an agreement of confidentiality. Examples of trade secrets include formulas, patterns, know-how, and company policy and guidelines. The key to trade secret protection is to maintain the secret's confidentiality. Any disclosure of the trade secret must be made in confidence following the terms of an applicable non-disclosure agreement.

Workforce members includes officers, employees, volunteers, trainees, and other persons whose conduct, in the performance of work for Highmark Health and its affiliates and subsidiaries.



Highmark Inc.
Highmark West Virginia Inc. d/b/a Highmark Blue
Cross Blue Shield West Virginia
 West Virginia Family Health Plan, Inc.
 Highmark Senior Solutions Company
Highmark BCBSD Inc.
 Highmark BCBSD Health Options Inc.
Highmark Senior Health Company
Highmark Benefits Group Inc.
Highmark Coverage Advantage Inc.
Highmark Select Resources Inc.
HM Health Insurance Company
HM Insurance Group, Inc.
 Highmark Casualty Insurance
 Company
 HM Life Insurance Company
 HM Life Insurance Company of New
 York
 HMIG-Clarity 360 LLC
Highmark Choice Company
United Concordia Companies, Inc.
 United Concordia Dental Plans, Inc.
 United Concordia Dental Plans of the
 Midwest, Inc.
 United Concordia Dental Plans of
 Pennsylvania, In
 United Concordia Dental Plans of
 Texas, Inc.
 United Concordia Dental Plans of
 California, Inc.
 United Concordia Insurance Company

 United Concordia Insurance Company
 of New York
First Priority Life Insurance Company, Inc.
HMO of Northeastern Pennsylvania, Inc. d/b/a First
Priority Health
HM Centered Health Inc.
HCI, Inc.
JEA, Inc.
Highmark Foundation
Caring Foundation
Highmark Ventures LLC

Allegheny Health Network
 Grove City Medical Center
 Wolf Creek Medical Associates
AHN LECOM JV LLC (50%)
Allegheny Health Network Surgery Center
- Bethel Park, LLC
AHN Emerus LLC (51%)
 AHN Emerus Fox Chapel, LLC
 AHN Emerus McCandless, LLC
 AHN Emerus Sawmill, LLC
 AHN Emerus Westmoreland, LLC
HMPG Inc.
 Monroeville ASC, LLC
HMPG Inc. Properties North LLC
 Gold Mist Advisors LLC
 Wexford Medical Mall LLC
 Silver Rain Management, LLC
 Silver Rain, LP (1% Silver Rain
 Management, LLC/99%
 HMPG Properties North
 LLC)
 Principo Advisors, LLC
 Platinum Advisors LLC
 Summer Wind Management,
 LLC
 Osiris Properties, LLC
Provider PPI LLC (99.5%)
 PDL Distribution Services LLC
 HMPG Pharmacy LLC
Allegheny Health Network
Emergency Medicine Management,
LLC (50%)
Klingensmith, Inc. (65%)
Physician Partners of Western PA
LLC
West Penn Allegheny Health System, Inc.
 West Penn Hospital Foundation
 Forbes Health Foundation
 Suburban Health Foundation
 Allegheny Medical Practice Network
 Allegheny Clinic Medical Oncology

West Penn Neurosurgery PC	Steel Valley Orthopaedic and Sports Medicine
Peters Township Surgery Center, LLC	JRMC Diagnostic Services, LLC
West Penn Ambulatory Surgical Company, LLC	Grandis, Rubin, Shanahan and Associates
West Penn Allegheny Foundation, LLC	JRMC Specialty Group Practice
West Penn Corporate Medical Services, Inc.	Jefferson Hills Surgical Specialists
McCandless Endoscopy Center (50%)	Pittsburgh Bone, Joint & Spine, Inc.
North Shore Endoscopy Center (50%)	JRMC Physician Services Corporation
5148 Liberty Avenue Medical Associates, LP (50%)	South Pittsburgh Urology Associates
Allegheny Clinic	The Park Cardiothoracic and Vascular Institute
Premier Women's Health	Saint Vincent Health Center
Physician Landing Zone	Emergycare, Inc. (50%)
Physician Owner(s) Sole Shareholder	Regional Heart Network (76.5%)
Premier Medical Associates, PC	Saint Vincent Shared Savings Program ACO, LLC
Allegheny Singer Research Institute	Vantage Health Group
Canonsburg General Hospital	St. Vincent Professional Building Leasehold Condominium Association (82.66% Clinical Services, Inc. ownership/17.34% Saint Vincent Health Center ownership)
Canonsburg General Hospital Ambulance Service	Saint Vincent Health System Clinical Services, Inc.
Alle-Kiski Medical Center	St. Vincent Professional Building Leasehold Condominium Association (82.66% Clinical Services, Inc. ownership/17.34% Saint Vincent Health Center ownership)
Alle-Kiski Medical Center Trust	Saint Vincent Rehab Solutions, LLC
JV Holdco, LLC (59.61%)	Saint Vincent Consultants in Cardiovascular Diseases, LLC
Celtic Healthcare of Westmoreland, LLC	Health System Service Corporation
Celtic Hospice and Palliative Care, LLC (79.9%)	Saint Vincent NWPA Surgery Center, Ltd. (75.1%)
Wexford Medical Mall and Hospital Condominium Assoc. (71.92%)	Vantage Holding Company, LLC (50.53%)
AHN Holding Company	
Jefferson Regional Medical Center (JRMC)	
Prime Medical Group, PCG1 d/b/a Prime Medical Group	
Primary Care Group 3, Inc.	
Primary Care Group 5, Inc. d/b/a V.E. Reyes, M.D. and Associates	
Primary Care Group 7, Inc. d/b/a JRMC Internal Medicine	
Primary Care Group 8, Inc.	
Primary Care Group 10, Inc. d/b/a McCormick Medical Associates	
Primary Care Group 11, Inc. d/b/a JRMC McMurray	
Family Practice Medical Associates South, Inc.	
Pittsburgh Pulmonary and Critical Care Associates	

Westfield Memorial Hospital, Inc.
Westfield Memorial Hospital
Foundation, Inc.
Westfield Hospital Regional
Auxiliary, Inc.
Physician Owner(s) Sole
Shareholder
Chautauqua Medical
Practice P.C.

The Saint Vincent Foundation for
Health and Human Services
Allegheny Health Network Home
Infusion, LLC (80%)
Saint Vincent Medical Education &
Research Institute, Inc.
Saint Vincent Affiliated Physicians
Regional Home Health and
Hospice (55.48%)
Regional Cancer Center (50%)
The Regional Cancer Center
Foundation

HM Health Solutions Inc.

Thryve Digital Health LLP (99% HM Health
Solutions Inc. / 1% HM Health Holdings
Company)

HM Health Holdings Company

Thryve Digital Health LLP (1% HM Health
Holdings Company / 99% HM Health Solutions
Inc.)

HM Home and Community Services LLC

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