



Summit Health Plan Code of Conduct

I. Introduction

Summit Health strives to act with absolute integrity in the way it does its work. This Code of Conduct provides guidance to ensure its work is performed in an ethical and legal manner. The Code of Conduct guides Summit Health's actions and contains resources to help resolve any questions about appropriate conduct.

No Code of Conduct can substitute for an individual's internal sense of fairness, honesty, and integrity. Thus, should an individual encounter a situation or consider a course of action that does not feel right, he/she should contact his/her leadership, the compliance officer, or report the situation through EthicsPoint, a confidential third-party reporting tool.

II. Purpose

This Code of Conduct is intended to be both comprehensive and easily understood, and applies to all Summit Health officers, directors, employees and contractors and extends across all lines of business, including Medicare and Medicaid, to the extent Summit Health chooses to engage maintains such a business line.

III. Standards of Conduct

Summit Health is committed to the highest standards of business ethics and integrity. Officers, directors, and employees will accurately and honestly represent Summit Health and may not engage in any activity intended to defraud anyone of money, property, or services.

Summit Health expects its officers, directors, employees, and contractors to:

- > Pursue the highest possible standards of performance, quality, service and achievement;
- > Observe the highest standards of professionalism at all times;
- > Exhibit a high degree of personal integrity at all times;
- > Refuse to engage in or tolerate any fraud, misuse, abuse or waste of resources;
- > Honor the privacy of employees, members, providers and contractors;
- > Show respect for others encountered in business activities and treat all fairly;
- > Solicit the opinions of others as appropriate and encourage different viewpoints when warranted;
- > Seek to resolve dissent and discord and, if it cannot be resolved, keep it in perspective and respect and support the decision and decision-maker(s);
- > Encourage others to report violations of this Code of Conduct and protect those who do report.

IV. Legal and Regulatory Compliance

Health insurance is a highly regulated industry, as the government seeks to protect the members and providers with whom Summit Health does business. In addition to laws specific to health insurance, Summit Health must also comply with regulations applicable to all corporations, regardless of the type of industry. Additionally, Summit Health is subject to federal and state laws and regulations, as well as the conditions of participation for federal healthcare programs (e.g., Medicare and Medicaid). Such laws, regulations, and conditions of participation address various issues including access to care, consent to treatment, financial record-keeping, medical records and confidentiality, member rights, and Medicare and Medicaid program requirements.

Summit Health's officers, directors, employees and contractors are expected to comply with all applicable laws, regulations, and conditions of participation. As such, Summit Health has developed policies and procedures to address many of these legal and regulatory requirements.

If an officer, director, employee or contractor suspects a violation of any applicable law, regulation, condition of participation, or internal policy and procedure, Summit Health expects the individual to report such violation immediately to its leadership, the compliance officer, or through EthicsPoint.

V. Member Rights

Summit Health members have certain rights regarding the services provided by both Summit Health and its contracted providers. This includes members' rights regarding privacy and security. These rights are listed below. Additional policies and procedures on member rights are maintained by specific departments to address privacy, information security, and quality of care, among others.

Non-Discrimination

Summit Health does not discriminate in the benefits and services it provides to its members based upon age, gender, disability, race, color, religion, marital status, sexual orientation, or national origin. Summit Health recognizes and respects the diverse backgrounds and cultures of its members and makes every effort to equip its officers, directors, employees, providers and contractors with the knowledge and resources to respect each member's cultural heritage and needs. Summit Health is mindful that the populations in the communities it serves are continually becoming more diverse. Summit Health respects its members rights to and need for effective communication.

Member Rights

In the promotion and protection of member rights, members are given information regarding confidentiality, privacy, and security, and the opportunity for resolution of complaints and appeals. Members have the right to be treated in a manner that preserves their dignity, autonomy, self-esteem, civil rights, and involvement in their own care.

Involvement in Healthcare Decisions

Summit Health seeks to involve members in all aspects of their care, including consent for treatment and the making of healthcare decisions, which may include foregoing or withdrawing treatment. As

applicable and appropriate under the terms of the member's plan, each member or his/her representative is provided information regarding the member's right to refuse treatment, make advance directives regarding treatment decisions, evaluate financial considerations regarding a proposed course of treatment, and designate of surrogate healthcare decision-makers.

Confidentiality of Member Information

In the course of providing services to its members, Summit Health obtains information about the member's medical condition, history, and personal data in order to pay claims, provide quality care and develop health improvement interventions. Summit Health appreciates the sensitive nature of this information and is committed to maintaining its confidentiality. Consistent with the Health Insurance Portability and Accountability Act (often referred to as "HIPAA"), Summit Health does not use, disclose or discuss member-specific information with others unless it is necessary to serve the member, to determine eligibility for benefits, or as otherwise required or permitted by law.

Summit Health's officers, directors, employees and contractors may not use or disclose confidential information in any manner that violates the privacy rights of its members. In accordance with Summit Health's privacy policies and procedures, no officer, director, employee, or contractor may access any member information other than the minimum necessary to perform his/her job.

VI. Contractors

Interactions with Contractors

Federal and state laws and regulations address the relationships between Summit Health and third parties with whom it contracts, including but not limited to providers, brokers, and vendors which are collectively referred to as contractors. It is important that those Summit Health's officers, directors and employees who interact with contractors, particularly with respect to payments for services rendered, are aware of the laws, regulations, and policies that govern the interactions between Summit Health and such contractors.

Generally, any arrangement with a contractor must be in writing and comply with legal and regulatory requirements, Summit Health policies and procedures, including this Code of Conduct, and with all applicable operational guidance that has been issued. No Summit Health officer, director, employee, or contractor is permitted to solicit or receive anything of value, directly or indirectly, in exchange for the referral of business to a contractor.

Excluded or Ineligible Persons

Summit Health does not contract with individuals or entities that are excluded or otherwise ineligible to participate in federal healthcare programs. This limitation extends to individuals or entities that have been suspended or debarred from federal government contracts, or convicted of a criminal offense related to the provision of healthcare items or services and have not been reinstated in a federal healthcare program after a period of exclusion, suspension, debarment, or ineligibility. We regularly monitor state and federal databases to identify such excluded individuals and entities.

VII. Confidential Information

Personal Information

Information about Summit Health's officers, directors, and employees, such as salary, Social Security Number, age, status, type of leave, banking or other financial information is not be shared with third parties unless required for Summit Health's business operations. If it must be shared, it is only shared with others on a "need to know" basis and subject to confidentiality obligations.

Intellectual Property and Trade Secrets

Summit Health's officers, directors, employees and contractors may not disclose information about Summit Health's intellectual property and trade secrets to unauthorized third parties. Internal disclosures of intellectual property or trade secrets should be limited to those individuals for whom such information is required in the performance of his/her job duties.

Proprietary Business Information

Summit Health's officers, directors, employees and contractors may not give confidential or proprietary information to unauthorized third parties such as competitors, suppliers, or outside contractors without proper authorization. This includes financial information, customer lists, rates, computer data, and computer programs, as well as descriptions of Summit Health's processes or operations. Additionally, Summit Health's officers, directors, employees and contractors may not discuss potential business relationships, purchases, mergers, acquisitions or other organizational changes either internally or with unauthorized third parties except on a "need to know" basis and only subject to confidentiality obligations.

VIII. Information of Third Parties

It is not unusual to obtain public information about other organizations, including Summit Health's competitors, through legal and ethical means such as public documents, public presentations, journal and magazine articles, and other published and spoken information. However, officers, directors, and employees should avoid seeking or receiving information about a competitor through other non-public means if they know or have reason to believe the information is proprietary or confidential.

Although Summit Health is not publicly traded, many of the companies with which it does business with are. During the course of dealing with such businesses, Summit Health's officers, directors, and employees may become aware of "insider information." The law prohibits the use of this information for the financial gain of Summit Health or any officer, director, or employee.

IX. Accuracy, Retention and Disposal of Documents and Records

Each officer, director, employee and contractor is responsible for the integrity and accuracy of the company's documents and records. Officers, directors, employees and contractors should recognize that the records and communications that they create have the potential to become public in the future. Therefore, exaggeration, derogatory remarks, guesswork or inappropriate characterizations of people and businesses in any and all work-related communications should be avoided. This applies equally to e-mail, internal memos and formal reports.

In addition, all officers, directors, employees and contractors are required to comply with regulatory and legal requirements to ensure records are available to support Summit Health’s business practices and audit obligations. No one may alter or falsify information on any record or document. Records must be retained and destroyed only in accordance with established Summit Health’s records retention policies.

X. Accounting

Every officer, director, employee and contractor, particularly the Chief Executive Officer, Chief Financial Officer, and Controller, are required to comply in all respects with all applicable laws, rules and regulations regarding financial accounting and reporting. Good financial reporting starts with accurate recordkeeping, and Summit Health must rely on its records to prepare financial statements that present its results of operations and financial position in a full, fair, accurate, timely and understandable manner. Accordingly, all officers, directors, employees and contractors involved with recording, summarizing and maintaining business and accounting records must do so fully, openly and honestly.

XI. Anti-Trust and Competition Laws

Anti-trust and competition laws prohibit certain conduct involving competitors, customers or suppliers. The purpose of these laws is to ensure that the market for goods and services operates efficiently and competitively. Violations of these laws can subject corporate violators to criminal penalties and civil damages, and individual violators to criminal penalties involving substantial fines, imprisonment or both. Summit Health’s directors, officers, employees and contractors must comply strictly with these laws.

No officer, director, employee or contractor should under any circumstances:

1. Discuss with competitors the prices of, or marketing plans for, any Summit Health products, or prices paid or to be paid for products, services or materials purchased by Summit Health, or other business information affecting such prices (“price” includes all terms of sale, including discounts, allowances, promotional programs, credit terms and the like);
2. Discuss with competitors or customers the boycotting of or implementation of pricing strategies intended to harm third parties; or
3. Engage in any conduct which is deemed anti-competitive.

It is Summit Health’s intent to comply with all applicable anti-trust and competition laws. If a question concerning the possible application or interpretation of such laws arises, contact the Legal and Regulatory Affairs Department.

XII. Conflict of Interest

In the performance of their duties for Summit Health, all officers, directors, and employees should be guided solely by the best interests of Summit Health. Where a possible conflict of interest exists or appears to exist, the affected officer, director or employee must disclose it to Summit Health. Each officer, director and employee should refrain from participating in decisions on behalf of Summit Health where such a conflict exists. A conflict of interest exists when an individual is in a position to benefit personally, whether financially or otherwise, either directly or indirectly, from dealings of

Summit Health with individuals or businesses outside the company. Additional information regarding conflicts of interest may be found in Summit Health's Conflict of Interest policy.

XIII. Political Activities

It is important to separate personal and corporate political activities in order to comply with the appropriate rules and regulations relating to lobbying or attempting to influence government officials. No use of corporate resources, including e-mail, is appropriate for personally engaging in political activity. An officer, director, and employee may participate in the political process on his/her own time and at his/her own expense. While doing so, it is important the officer, director, or employee not give the impression he/she is speaking on behalf of or representing Summit Health in these activities, unless he/she has been given express permission from Summit Health to do so. Officers, directors, and employees cannot seek to be reimbursed by Summit Health for any personal contributions for such purposes.

XIV. Administration of the Code of Conduct

This Code of Conduct is meant to supplement, and not to replace, other Summit Health policies that may relate to similar matters. Summit Health expects each officer, director, and employee to abide by and to act in a manner consistent with this Code of Conduct. As part of this responsibility, all officers, directors, and employees are expected to report any activity or practice that they believe violates this Code of Conduct. Failure to abide by this Code of Conduct or the guidelines for behavior which the Code of Conduct represents, may lead to disciplinary action. Discipline for failure to abide by the Code of Conduct may range from verbal warning to termination. For contractors, it may result in termination of the contractor's contract. Summit Health reserves the right to modify, amend or alter the Code of Conduct without notice.

XV. Suspected Violations of the Code of Conduct

If questions regarding this Code of Conduct or a situation that potentially violates provisions of this Code of Conduct arise, an officer, director or employee should immediately contact his/her leadership, the compliance officer, or report the situation through EthicsPoint (1-866-294-5591 or www.ethicspoint.com). Summit Health ensures that there will be no retribution for asking questions or raising concerns about the Code of Conduct or for reporting possible improper conduct.



Code of Conduct Acknowledgement Form

I, _____, do hereby acknowledge I have read and reviewed the Code of Conduct and understand its contents. I agree to comply fully with the standards, policies and procedures contained in the Code of Conduct and Summit Health's policies and procedures, including the Summit Health Compliance Plan and policies on fraud, waste and abuse. I understand that I have an obligation to report to Summit Health any suspected violations of the Code of Conduct or other Summit Health policies and procedures of which I am aware.

I acknowledge that the Code of Conduct is a statement of policies for business conduct and does not, in any way, constitute an employment contract or an assurance of continued employment or contractual relationship with Summit Health.

Signature: _____

Date: _____