



OUR CODE OF CONDUCT

A message from JOHN FORSYTH

We are a company that keeps our promises — promises we make to our members, to one another and to the community. By keeping our promises, we will continue to earn the trust of our members and maintain a corporate culture of integrity.

As one of our core values, integrity means everything. If members or business partners ever see us as a company that cuts corners or is perceived as unethical, it reflects poorly on each of us and Wellmark, and it hurts our reputation. That is why I am enthusiastic about our Code of Conduct. It provides us with additional help and information about our responsibilities, so we can consistently and efficiently apply our values and act with integrity each and every day. It is our Board of Directors' expectation that Wellmark will at all times be fully committed to compliant, lawful, and ethical conduct, as well as committed to promoting an organizational culture that encourages ethical conduct and a commitment to compliance with the law.

While this Code of Conduct serves as a great resource, it can't address every question or situation. That is why we have a Business Ethics and Compliance Program that includes our Ethics Hotline, training, this Code of Conduct and additional resources. If you are unsure of what to do in a particular circumstance or are concerned that the law, regulations, or our policies are not being followed, you have a responsibility to bring that to our attention. When in doubt, speak up and ask questions. Remember: Integrity is one of our core values.

The quality of our workforce and our commitment to ethics and compliance will not only enable us to succeed today, but it will also help us achieve long-term success. I need everyone to continue to honor and keep our promises, and help us be a company known for integrity.

A handwritten signature in black ink that reads "John Forsyth".

JOHN FORSYTH
CHAIRMAN AND CHIEF EXECUTIVE OFFICER

We are all in compliance

About the Code of Conduct

This Code of Conduct is intended to help you apply our values and standards and serves as a first source of compliance information. In some instances, you may need additional information and guidance from your leader, senior leader or the Compliance Office. Specific topics are referenced with links throughout the Code of Conduct. Employees of our joint venture groups should seek guidance and obtain additional information from comparable resources, available through their own organizations, rather than the Wellmark resources listed in this Code of Conduct.

Of course no code of conduct can cover every possible situation, which is why we will continue to rely on you to use good judgment and to speak up whenever you have questions or concerns.

When it comes to ethics and compliance We Are All IN: Stay INformed, INVolved, and INvested in our success. Always act with INtegrity. Help create a culture that is open and INcludes others. When in doubt, ask questions and INquire.

In this Code of Conduct, Wellmark, Inc., Wellmark of South Dakota, Inc., Wellmark Health Plan of Iowa, Inc., Wellmark Value Health Plan, Inc., and Wellmark Synergy Health, Inc. are referred to collectively as “Wellmark.”

NOTE: *Some hyperlinks within our Code of Conduct navigate to pages housed on Wellmark’s intranet. If you do not have access to these links via your Wellmark employee ID, please contact the Compliance Office.*

WHO MUST FOLLOW OUR CODE OF CONDUCT?

You are expected to read and follow this Code of Conduct and to comply with all Wellmark policies, laws and regulations that apply to your work. Third parties doing business with us are expected to conduct themselves

in a manner consistent with our Code of Conduct. They must also meet all contractual obligations, and follow the requirements included in our Vendor Code of Conduct.

Our responsibilities

We all have a role to play in protecting Wellmark’s reputation. At a minimum, you are expected to meet the following responsibilities:

- **Comply with applicable laws,** regulations and standards that govern our business.
- **Be familiar with the information** contained in this Code of Conduct and related policies. Pay particular attention to the policies that pertain to your job responsibilities.
- **Always act in a professional and ethical manner.** Your behavior reflects on our company.
- **Complete all required** compliance training.
- **Treat your colleagues and our customers** with dignity and respect.
- **Avoid conflicts of interest** between your work for Wellmark and your personal affairs.
- **Be honest and fair** in all your Wellmark activities and relationships.
- **Promptly report** any suspected illegal or unethical behavior.
- **Notify the legal department or the Compliance Office** if you have been convicted of criminal conduct or excluded or prohibited from participating in a federally funded program.

Remember, pressures or demands to meet goals or deadlines are never an excuse for violating the law, our Code of Conduct or any Wellmark policy.

Leaders' additional responsibilities

Leaders at Wellmark have additional ethics and compliance responsibilities:

- **Lead by example** and be a role model for ethical behavior.
- **Take initiative**, particularly in tough situations.
- **Be a resource for others.** Communicate to employees and business partners how the Code of Conduct and policies apply to their daily work.
- **Create an environment where candor, honesty and integrity are valued** and where everyone feels comfortable asking questions and reporting potential violations of the Code of Conduct and policies.
- **Create a culture in which fair employment practices** extend to every member of the diverse Wellmark workforce.
- **Listen and respond** to concerns when they are raised.
- **Make sure no one who speaks up**, reports an issue or participates in an investigation suffers retaliation.
- **Never ask or pressure anyone** to do something you would be prohibited from doing yourself.
- **Be consistent when enforcing our standards** and holding people accountable for their behavior at work. Leaders should consult with the Compliance Office or Human Resources for guidance and to ensure consistency in similar situations.

Q&A

Q: I'm a leader, and I'm not clear what my obligations are if someone comes to me with a compliance or ethics issue — and what if it involves a senior leader?

A: No matter who the issue involves, you must report it without exception. We provide several avenues for reporting concerns. If for any reason you are uncomfortable making a report to a particular person, you may talk to any of the other resources listed in this Code of Conduct.

Q: If I observe misconduct in an area not under my supervision, am I still required to report the issue?

A: Yes. You are primarily responsible for employees under your supervision, but all Wellmark leaders are required to report any misconduct they become aware of and take action. The best approach is to talk with the leader who oversees the area where the problem is occurring, but if this doesn't work, or isn't feasible, you should use other resources listed in this Code of Conduct.

Making good decisions

Making the right decision is not always easy. There will be times when you may be under pressure or unsure of what to do. Always remember that resources are available to help.

When faced with a difficult decision, it may help to ask these questions:

- Is it consistent with our values, policies, and this Code of Conduct?
- Have I considered all the possible options?
- Have I thought through the consequences and the risks involved if I fail to report it?

If the answer to any of these questions is "No," or if you are uncertain, stop and ask for guidance.

CLOSING THE LOOP

Compliance at Wellmark must continually evolve to stay current with new and emerging risks and regulations. Once you've made a decision, ask yourself the following additional question:

Do you believe there are sufficient standards, policies and resources in place to address the issue you faced — or should more be done? If you believe more should be done, contact the Compliance Office. Your suggestions are welcome and will help us improve our compliance program.

Sharing concerns and your obligation to report

Each of us has an obligation and a responsibility to protect the reputation and integrity of Wellmark. If you see or suspect illegal or unethical behavior, including possible violations of this Code of Conduct, or if you have a question or need help making a compliance decision, you have several options. You may make a report or discuss your questions using any of the following channels:

- **Contact your leader, or the officer or senior leader** in charge of your division
- Email Ethics & Compliance
- Call the Wellmark Ethics Hotline, anonymously if you wish, **1-877-330-3667**
- Call the Wellmark Compliance Office **(515) 376-4949**
- Contact the Wellmark **Chief Compliance Officer**
- Contact the Wellmark **General Counsel**
- If you identify yourself when reporting through any of the channels mentioned, we will make every effort to **maintain your confidentiality to the extent possible allowed by law**. In some instances during the course of investigations, information may be shared on a need-to-know basis. Under some circumstances, Wellmark may be required by law to report certain types of activities.
- **If you report anonymously**, please provide as much information and details about the report, so we may follow up with all knowledgeable parties to conduct a thorough investigation. All reports of known or suspected violations will be investigated fully. Any identified compliance or ethics violations will be addressed and corrected.
- **When an investigation is completed**, Wellmark will determine if corrective or disciplinary action is necessary. While you may be informed when an investigation has come to a conclusion, it is not always permissible to share details of findings and results.

- **You will be expected to cooperate with the investigation.** Failure to report or cooperate in an investigation may be grounds for employee discipline, up to and including termination of employment.

STAY INFORMED: HOW THE ETHICS HOTLINE WORKS

Our Ethics Hotline provides a confidential way to report possible violations of the Code of Conduct, laws, rules or regulations. You may contact the Ethics Hotline 24 hours a day, seven days a week at 1-877-330-3667. The Ethics Hotline call center is staffed by third-party ethics and compliance specialists. Translation services are available.

When you contact the Ethics Hotline, the operator will listen, ask clarifying questions, if necessary, and then write a summary report of the call. The summary will then be provided to Wellmark for assessment and further action.

It is important to provide as many details as possible, (e.g., who, what, when, where), especially when reporting anonymously. Because the investigator may need additional information during the review, you will be assigned a report number and asked to call back at a later date to answer any follow-up questions.

STAY INFORMED: COOPERATING WITH INVESTIGATIONS

You have a responsibility to fully cooperate with all internal investigations and audits, as well as those initiated by government authorities. More harm can be done to both Wellmark's and to your reputation if you mislead investigators or fail to disclose what you know. Always present the facts fully and honestly.

Immediately contact the legal department or the Compliance Office for additional guidance if you are contacted by a government official conducting any kind of investigation.

Q&A

- Q:** My leader does not respond when I raise concerns about potential misconduct, and I believe she has made things difficult for coworkers who have raised issues. Now I have a problem. A coworker is doing something that I believe to be ethically wrong. What should I do?
- A:** Take action and speak up. You are required to report misconduct. While starting with your leader is often the best way to efficiently address concerns, if you do not feel comfortable doing so, you can contact the Ethics Hotline or the Compliance Office.
- Q:** What if someone misuses the Ethics Hotline, makes an anonymous call, and falsely accuses someone of wrongdoing?
- A:** Experience has shown that the Ethics Hotline is rarely used for malicious purposes, but it is important to know that we will follow up on calls, and anyone who uses the Ethics Hotline in bad faith to spread falsehoods or threaten others, or with the intent to unjustly damage another person's reputation or get them fired, will be subject to disciplinary action up to and including termination.

Commitment to non-retaliation

Regardless of the type of misconduct reported or the reporting channel used, we will not tolerate retaliation against anyone who makes a good faith report of an alleged violation of the law, this Code of Conduct or our policies or who cooperates in an investigation.

We take claims of retaliation seriously; they will be investigated and if substantiated, retaliators will be disciplined up to and including termination. If you believe you have been retaliated against, or witness retaliation, contact the Compliance Office.

Waivers and exceptions

The Compliance Office will regularly reassess the Code of Conduct and make recommendations for updates. In extremely limited circumstances, Wellmark may find it necessary to waive a provision of the Code of Conduct. Waivers and exceptions to the Code of Conduct can only be made with prior written approval.

If you believe an exception is warranted, submit a written request for the exception to **Ethics & Compliance**. The Compliance Office will review the exception request and will respond to you in writing.

All waivers and exceptions will be reported to the Compliance Committee of the Board of Directors. All material changes to the Code of Conduct are subject to approval by the Board of Directors.

STAY INVOLVED:

Reporting "in good faith" means you had reason to believe a violation of the Code of Conduct existed and are sincere in your attempt to provide honest and accurate information, even if the investigation determines there was no violation.

If you believe there has been a violation, notify your leader or the **Wellmark Compliance Office at (515) 376-4949**.

A promise to our members

Our members trust us to do more than provide them with health care coverage. They trust us to have their best interests in mind and to act in accordance with high ethical standards. It's a responsibility we take seriously, and it's the reason our actions and decisions are driven by integrity.

Conflicts of interest

A conflict of interest exists when your personal life — activities, interests or relationships — influences or appears to influence the decisions you make at work. Conflicts of interest have the potential to prevent you from acting in the best interest of Wellmark and our members.

It's important to recognize conflicts, avoid them when possible and follow all our disclosure requirements.

Remember: You are expected to make objective business decisions in the best interest of Wellmark and its members.

If a conflict does exist, we will work together to resolve the problem whenever possible.

What does a conflict of interest look like?

There are a wide variety of circumstances that could be considered conflicts of interest. While it is difficult to list them all, below are common situations where they may arise:

Gifts

Gifts can create a conflict if they place you under some obligation to the giver or appear to affect your ability to make objective business decisions on Wellmark's behalf. See our section on Gifts, Entertainment and Hospitality for more information.

Personal and family relationships

Mixing personal and professional relationships can create the impression of preferential treatment. This can be a conflict of interest if you:

- **Work with an organization** (supplier, customer, or competitor) in which a member of your family plays a key role.
- **Represent Wellmark in any transaction** in which you or any member of your immediate family has an interest.
- **Access records or process transactions** involving yourself, your family, friends, coworkers or acquaintances.

Financial interests

If you or a family member has a financial investment in a current or potential supplier, customer or competitor, it could create a conflict that can impact your ability to make objective business decisions.

Confidential business information

Because of your position at Wellmark, you may have access to confidential business information. You should not use such information for personal gain nor should you share it with others unless they have approval and a legitimate business reason to know. See Confidential Business Information for more information.

Outside activities

Employment or service to another company (paid or unpaid), including membership on an outside board of directors, could interfere with your duties and obligations here at Wellmark. Wellmark encourages volunteerism and community involvement, but be sure to check with your leader about any potential conflicts.

Your leader may notify you of additional activities that create a conflict of interest due to your specific job responsibilities.

STAY INFORMED:

Even the perception of a conflict of interest can be damaging to our reputation. If a third party believes there is a conflict or that someone is receiving preferential treatment, their perception can have consequences. For this reason, you need to be aware of how situations may appear to others. Even if your intentions are good and you believe there is no actual conflict, you must still identify and disclose situations that may be perceived by others to be conflicts. It is always best to err on the side of disclosure.

Discuss all potential conflicts with your leader or the Compliance Office to determine if action should be taken.

COMPLETE THE CERTIFICATION AND CONFLICT OF INTEREST DISCLOSURE STATEMENT

To help identify and resolve conflicts of interest, we require you to annually complete a Certificate and Conflict of Interest (CCOI) Disclosure Statement. Use this form to report any potential conflicts of interest, and update it annually or as your circumstances change.

Your responsibilities

- **Conflicts are not always easy to identify.** If you are presented with a situation that might involve a conflict or the appearance of a conflict, ask these questions:
 1. To an impartial observer, would it appear to be a conflict?
 2. Could my judgment be impacted by concerns for my personal activity or interests?
 3. Is my personal activity or interest something a colleague, customer or business partner would reasonably expect to be disclosed?
 4. Is there a policy or procedure that covers this type of situation?
- **When in doubt,** if you have questions, or if you believe a conflict exists, notify your leader or the Compliance Office.
- **You are required to report** any real or perceived conflicts of interest as they arise and as part of the Certification and Conflict of Interest Disclosure process.
- **Report any conviction of a felony crime of dishonesty or breach of trust immediately,** but in no more than 30 days from the date of the conviction. Report this information to your leader, human resources or the Compliance Office, and update your Certification and Conflict of Interest Disclosure Statement accordingly.
- **Additional rules** and procedures are applicable to our directors and executive officers.

If you believe a conflict exists, notify your leader or the Wellmark Compliance Office at (515) 376-4949.

Q&A

Q: I would like to get a part-time job at a local retailer. I know they offer a Wellmark plan to their full-time employees. Would taking the position part-time be a conflict of interest?

A: Part-time jobs at a local retailer would generally not present a conflict, but you should discuss any outside employment with your leader. Your leader has an in-depth knowledge of your job responsibilities and how they could be impacted by this outside employment. Complete the **Part Time Job Conflict of Interest Form**.

If the part-time job is approved, continue to be careful in your interactions:

1. Do not disclose any confidential information about the work you do at Wellmark with anyone, including your colleagues and managers at your part-time job.
2. Be sure you (and your retail coworkers) understand you are prohibited from accessing their files or processing any of their claims or transactions.
3. Do not take any action that could negatively impact the relationship between the retailer and Wellmark.

Q: My spouse has taken a job in the office of one of our contracted doctors. Is this a conflict of interest?

A: Report the relationship to your leader and complete an updated **Certificate and Conflict of Interest (CCOI) Disclosure Statement** to disclose the information properly and to help us determine if a conflict exists. Even if it is not a conflict of interest, remain careful when discussing work and do not disclose confidential Wellmark information to your spouse.

Gifts, entertainment and hospitality

When handled properly, appropriate gifts and entertainment can strengthen business relationships, but when abused, they can damage our reputation, harm our business and may even be illegal. For this reason, gifts and entertainment may only be given if they are reasonable complements to business relationships, are consistent with our policies, are legal, and are acceptable under the policies of the recipient's organization.

In general, gifts to you or a member of your family from anyone doing business with, or seeking to do business with, Wellmark are discouraged. You may not accept gifts valued at more than \$100 (more than \$200 total from all sources in a calendar year). There may be a rare occasion when it is appropriate to accept a gift outside these guidelines, but this should only be done with approval of your senior leader. All gifts not acceptable under these guidelines should be returned or otherwise disposed of as directed by your leader.

Some types of gifts and entertainment are never allowed including:

- **Gifts to or from** government employees
- **Frequent gifts or entertainment** from the same individual or company
- **Gifts of any amount** you believe are intended to influence a business decision, such as bribes, kickbacks or rebates
- **Cash or cash equivalents**, such as gift certificates, gift cards or vouchers that can be converted wholly or partially into cash (gift cards may be kept if they cannot be converted to cash)
- **Gifts or entertainment** that are sexually oriented, or otherwise inappropriate
- **Entertainment or events** that do not include a business-related component

Your responsibilities

- **Only provide and accept gifts** and entertainment that are reasonable complements to business relationships.
- **Do not exceed** the gift dollar limits.
- **Do not solicit personal** gifts, favors, entertainment or services.
- **Free admission or travel** to business conferences or seminars should only be accepted if you receive prior approval from the Compliance Office and senior leadership of your area.
- **Items of a reasonable value** that are won in random drawings or as prizes at events or conferences may be kept subject to the guidance and approval of your leader. You should promptly report any prize you receive and the estimated value on your Certification and Conflict of Interest Disclosure statement.
- **All gifts and entertainment** must be properly reflected in the books and records of Wellmark, in accordance with applicable procurement and reimbursement policies.
- **If you have a question** about a specific situation, you should discuss it with your leader, your senior leader, or the Compliance Office, and follow their advice.

You may not accept gifts valued at more than \$100 — more than \$200 total for one year.

STAY INFORMED: ADDITIONAL GIFT RESTRICTIONS

If you work directly with the Federal Employee Program (FEP) or Medicare business the individual and total gift limit for FEP is \$25 and for Medicare no gifts are permitted. You should immediately report the receipt of any gift to your leader and be guided by their direction. You should promptly report any gift you receive and the estimated value on your Certification and Conflict of Interest Disclosure statement.

Licensed insurance agents should not accept monetary gifts of any value or personal loans from any customer or prospective customer.

Other areas, such as Procurement, may have more restrictive rules, please consult your leader with any questions.

Q&A

Q: A vendor has offered to pay for my registration fee, hotel and airfare to a conference. May I accept this?

A: It's important to remain objective when working with vendors who are looking to earn or retain our business. If the purpose of the conference supports Wellmark's business needs, then Wellmark should pay for the registration fee, hotel and airfare as a business expense.

Q: When I was traveling, I received a gift from a supplier that may be considered excessive, but I'm not sure. What should I do?

A: If you receive any gift that you think may exceed our limits, you should immediately report it to your leader who will decide how the gift should be disposed of or used and what further steps, if any, are necessary.

Q: A business partner invited me to attend a sporting event with him and sit in his firm's suite. Is it acceptable for me to go?

A: Attending a sporting event with a business partner may be an appropriate business courtesy, as long as doing so is consistent with our policies and his company's policies — including that the value of the tickets is within limits. See the section on gift limits, including special restrictions if you work with FEP or Medicare business. However, in this case, the tickets include access to a firm's suite and are likely to have a high monetary value. You should discuss the matter with your leader and seek pre-approval. Also remember, if the tickets were for your personal use and the business partner was not attending the event with you, the tickets would be considered an unacceptable gift since there would be no business purpose for you to attend the event. If you choose to purchase the tickets at face value with your personal funds, this would be acceptable.

Confidential personal information

Our customers, members, colleagues and providers rely on us to protect their confidential and private information from theft, misuse and unauthorized disclosure. As an employee, you may have access to this information, and it is important to handle it carefully.

Access and use the minimum amount of personal information that is necessary to do your job, and do not share the information unless there is a business reason to do so. Make sure safeguards are in place to protect any personal, confidential information you access as a part of your job duties.

What personal information is confidential?

Information about our customers, plan members, employees (and those who have applied for employment) and contracting providers should be treated as confidential. This includes:

- **Personally identifiable information (PII)** that can be used to trace someone's identity or combined with other personal information to do so. Examples include:
 1. Name
 2. Birth date
 3. Address
 4. Social Security number
 5. Financial or banking information
- Protected health information (PHI), a specific kind of personal information that identifies an individual and relates to their:
 6. Physical or mental health status
 7. Medical history
 8. Health claims including diagnosis, procedure and payment
 9. Health insurance premium billing and payment

STAY INFORMED:

Data breaches violate the trust that we work hard to establish, and they can have a variety of consequences. If a breach of PHI occurs, we must notify affected individuals, the Secretary of Health and Human Services (HHS), and, in some cases, the media. Keep this in mind, and take precautions to avoid these breaches.

If you suspect a PII or PHI breach has occurred, you must report it to the Privacy Office.

Wellmark Ethics Hotline: 1-877-330-3667

Compliance Office: 515-376-4949

Your responsibilities

- **Comply with** Wellmark's Health Information Privacy Policies and Procedures.
- **Do not access, use or disclose our members' PII or PHI**, except as required to perform the responsibilities of your job.
- **Never access or process transactions** involving your own records or the records of your family, friends, coworkers, or acquaintances.
- **Take precautions when handling confidential personal information.**
 1. Verify identities and authenticate phone calls before disclosing information.
 2. Obtain proper consent from members prior to releasing information to third parties.
 3. Avoid unintentional exposure of confidential information in public settings, such as on phone calls or while working on your laptop.
 4. You are prohibited from using a cell phone or other mobile device (including a Wellmark device) to send confidential personal (PII and PHI) or business information via text or other messaging apps.
- **Secure files and documents** when not in use.
- **If you are notified, or if you suspect**, that there has been unauthorized or inappropriate acquisition, access, use or disclosure of our members' PII or PHI, report it to our Privacy Office.

Q&A

Q: My mother is a Wellmark member and has questions about the status of a claim. I have access to this information. I'm not going to process the claim for her; I only want to give her an update on it. Is this acceptable?

A: No, you may not access your own records or the records of your family, friends, coworkers or acquaintances. To help your mother get her questions answered, please have her call Customer Service. The number is on the back of her Wellmark ID card.

Fair competition

Fair competition ensures our customers get the best possible service at the best possible price. Competition and antitrust laws are designed to preserve the competitive process and the free market. Violations of these laws can result in severe penalties for Wellmark and for the individuals involved. It is important to avoid engaging in anti-competitive activities or unfair trade practices.

Antitrust laws are complex and compliance requirements can vary depending on the circumstance. If you have any questions or if you see a potential violation of antitrust policies, contact the legal department or the Compliance Office.

STAY INFORMED: ATTENDING TRADE SHOWS AND PROFESSIONAL MEETINGS

The risk of discussing prohibited topics with competitors (providers, health systems and other health insurers) typically arises at trade or professional meetings or seminars where they are present. It is especially important in these situations to not get drawn into discussions concerning pricing, labor costs, marketing plans, and the like.

A competitor is any person or company in our industry that offers products or services similar to ours. Providers, health systems and other health insurers can all be competitors.

If you find yourself in such a situation, immediately excuse yourself from the conversation and if appropriate, ask that your refusal to participate be documented in the meeting minutes. You should also immediately report any such incident to one of the lawyers in our legal department or the Compliance Office.

Your responsibilities

- You should not engage in these types of prohibited activities, which include but are not limited to:
 1. **Price fixing:** Collaborating with a competitor to decide what to charge for products or other services, or what to pay for services. To avoid any implication of this, you should not discuss pricing or supplier relationships with a competitor.
 2. **Group boycotts:** Agreeing with other competitors to refuse to deal with particular suppliers or vendors.
 3. **Customer or market allocations:** Agreements to allocate the market for our goods and services among ourselves and our competitors.
 4. **Unfair or deceptive advertising:** Advertising which is untruthful or misleading.
- You should not solicit or obtain confidential information about a competitor in a manner that would be illegal or would require a person to violate a contractual agreement, such as a confidentiality agreement with a prior employer.

Q&A

Q: I received rate information from one of our competitors prior to it being released publically. What should I do?

A: You should contact the legal department or the Compliance Office without delay and before any further action is taken. It is important from the moment we receive such information, we demonstrate respect for antitrust laws and we make clear we expect others to do the same. This requires appropriate action that can only be decided on a case-by-case basis and may include sending a letter to the competitor. It is not acceptable to simply keep the information to yourself.

Third-party relationships

Wellmark conducts business with high ethical standards, and we expect nothing less from those with whom we do business. Third parties doing business with Wellmark are expected to conduct themselves in a manner consistent with our Code of Conduct, they must meet all contractual obligations, and follow the requirements included in our Vendor Code of Conduct.

Your responsibilities

If you purchase goods and services for Wellmark, or if you are involved in the procurement process, demonstrate integrity in your relationships, actions and communications.

- Identify and disclose all potential conflicts of interest.
 1. Do not solicit or accept money, loans, credits, or prejudicial discounts, gifts, entertainment (including meals), favors or services from present or potential suppliers that might influence or appear to influence purchasing decisions.
 2. Be fair and objective throughout the purchasing process and contract lifecycle.
 3. Create an environment of equality, where all business concerns, large or small, majority- or minority-owned, have the same opportunity to compete for our business.
- If you are a business owner who is responsible for third parties, you are expected to monitor their adherence to contractual obligations and report any non-compliance to the Compliance Office.

Q&A

Q: I requested estimates for a brochure print job from several printers. One of the printers responded with an offer to fly my team out to their facility — all expenses paid. Is this considered a normal part of the vendor selection process, or would this be a violation of our Code of Conduct?

A: This is not a standard part of the selection process, and it could influence (or appear to influence) your decision when it comes to awarding the job. Decline the offer and report it to your leader.

Fraud, waste and abuse

Fraud, waste and abuse have costly consequences for us, our members and the health care system as a whole. Each of us must do our part to combat fraud, waste and abuse. Be on the lookout for incidents or suspicious activity, ask questions, and report your concerns to your leader or to the Compliance Office.

Understanding fraud, waste and abuse — how it happens and the forms it can take — is the first step in its prevention.

WHAT DOES FRAUD, WASTE AND ABUSE LOOK LIKE?

Fraud

Fraud occurs when people intentionally make a false statement or misrepresentation in order to get money or benefits to which they are not entitled. Examples include:

- Claims fraud, including filing fictitious claims
- Doctor shopping, or visiting multiple doctors for narcotics
- Provider fraud, including billing false claims, adding modifiers or up-coding
- Misrepresentation of personal information to enroll in a plan
- Agent fraud, including enrolling individuals in a non-existent plan, offering cash payments to enroll or misrepresenting plans
- Employer fraud, including enrolling ineligible individuals, providing inaccurate hire or termination dates or providing false information

STAY INFORMED:

If you process claims or file reports for government programs, it's critical you do this accurately and truthfully. It is a violation of our Code of Conduct and the federal False Claims Act (FCA) to knowingly submit false or fraudulent claims to Medicare, Medicaid or other federal health care programs. This applies to anyone with actual knowledge of the falsity of the information and those who act in deliberate ignorance or disregard.

Waste

Waste happens when health care funds, benefits or services are overused or used without a real need.

Examples include requesting payment for unused or contaminated portions of medical supplies, provider practices or operational errors.

Abuse

Abuse describes incidents that result in unnecessary costs because they do not follow accepted standards and practices, but there is no intent to deceive or misrepresent information. Examples include waiving cost shares or deductibles, maintaining inadequate medical or financial records or providing services that are not medically necessary.

Your responsibilities

- **Know the warning signs of fraud, waste and abuse, such as:**
 1. Resubmitting denied claims using a different procedure code
 2. Altering claims or patient records (e.g., items handwritten when the rest of the claim isn't)
 3. Misusing or misspelling medical terms
 4. Listing services as rendered in another state or on a holiday or weekend
 5. Submitting multiple billings for the same service
 6. Billing for services that haven't been rendered
 7. Billing for an amount that doesn't correspond to the services rendered
 8. Submitting high-dollar claims (e.g., charges for the service being billed are out of the ordinary)

- **If you suspect or discover, fraud, waste or abuse** by employees or any third party doing work for Wellmark, report it to your leader, the legal department or the Compliance Office.

Q&A

Q: I received a call from a member who said she was sent a bill for a test that wasn't performed. I've received similar calls about the same doctor. Should I assume this is a clerical error, or could it be fraud?

A: This is a red flag for potential fraud. Report it to your leader, the Ethics Hotline or to the Special Investigations Unit using the Fraud Waste and Abuse form.

A promise to our team

We all play a role in maintaining a positive corporate culture based on respect and fairness. When we respect, value and look out for one another, we succeed individually but also as a company.

Anti-discrimination and Equal Employment Opportunity

We value the unique contribution each employee brings to Wellmark. Teamwork and respect are central to how we work, and we believe the best solutions are those that draw on diverse ideas and perspectives. Every employee is an important contributor to our success, and we aim to create a supportive, accepting and rewarding work environment where everyone has the opportunity to contribute.

We are committed to fostering a culture where people, regardless of their differences, feel respected, safe and valued. You can help us reach our goals by making your own commitment to Wellmark's core values of diversity and inclusion.

Wellmark is an Equal Employment Opportunity/Affirmative Action Employer. Wellmark is not only required to meet these standards as a federal contractor, but also the board

and senior management have determined it is the right thing to do.

Affirmative Action programs include policies, practices and procedures designed to ensure all qualified job applicants receive an equal opportunity for recruitment, hiring, promotion and other terms and privileges associated with employment.

STAY INFORMED:

Wellmark is committed to complying with equal employment opportunity laws and other applicable civil rights, human rights and labor laws.

Wellmark will provide all applicants for employment and all Wellmark employees with equal opportunity for employment without regard to race, gender, color, religion, sex, national origin, age, veteran status, mental and/or physical disability, sexual orientation, gender identity, genetic information or any other characteristic protected by law, or participation in any protected activity. We make reasonable accommodations to meet our obligations under laws protecting the rights of persons with disabilities.

Your responsibilities

- **Treat others** and their ideas with respect.
- **Remember, our commitment to diversity** enables us to attract and retain talented individuals who contribute to our success.
- **Help create an environment** where others feel comfortable speaking up and contributing.
- **If you supervise others, including third parties,** let them know they are expected to act in a manner consistent with our sense of fair treatment and equal opportunity.

Q&A

Q: One of my coworkers sends emails containing jokes and derogatory comments about certain nationalities. They make me uncomfortable, and I usually delete them. No one else has spoken up about them. Should I do more?

A: You should immediately notify your leader, Human

Resources, or the Compliance Office. Sending such jokes violates our position on diversity, harassment, discrimination and the use of our email systems. By doing nothing, you are condoning discrimination and tolerating beliefs that can seriously erode the team environment we have all worked to create.

Wellmark’s Affirmative Action Plans are available for review by any employee or applicant for employment by appointment only by contacting Human Resources.

Anti-harassment

We believe everyone should be able to do their job in a professional, respectful environment, free from behavior that creates intimidating, hostile or offensive working conditions. We do not tolerate any form of harassment.

Harassment affects everyone. It is personally offensive, lowers morale and interferes with our ability to work together. Whether committed by a member of Wellmark’s staff or leadership team or one of our vendors, harassment in all of its forms is prohibited.

Your responsibilities:

- **Understand that inappropriate** comments and offensive behavior will not be tolerated.
- **Keep in mind, harassment is not tolerated** in any business interactions regardless of the setting or parties involved.
- **If you become aware of or suspect an incident of harassment** or unlawful discrimination, report your knowledge or suspicions to any of the reporting channels mentioned under the section on Sharing Concerns.

STAY INFORMED:

Harassment does not have to occur in the workplace or involve a Wellmark employee to violate our Code of Conduct or the law. It is also unacceptable in any other Wellmark work setting, at any Wellmark-sponsored event, or when

using Wellmark’s electronic assets (e.g., email, internet, etc.). Engaging in this conduct is prohibited, and if you observe it, report it. As with any report of misconduct, we will not tolerate retaliation against anyone who makes a good faith report of an alleged violation.

Q&A

Q: While on a business trip, a colleague repeatedly asked me out for drinks and made comments about my appearance that made me uncomfortable. I asked him to stop, but he wouldn’t. We weren’t in the office and it was ‘after hours’ so I wasn’t sure what to do.

A: This type of conduct is not tolerated, not only during working hours but in all work-related situations — including business trips. If you are not comfortable raising the issue with your leader, talk to Human Resources or the Compliance Office. They will protect your confidentiality as much as possible while taking steps to stop the offensive behavior. You can also contact the Ethics Hotline at 877-330-3667.

Safe workplace

We all need to be aware of safety, health and security risks as we go about our jobs. Each of us has the responsibility to work in a way that helps ensure the safety, health and security of our coworkers, business partners and visitors to our offices. Be proactive and do your part to address possible risks.

Your responsibilities

- **If you become aware of any threat to safety**, report it immediately to your leader, or contact Physical Security.
- **Violence, threats or intimidation toward anyone** at work is never tolerated. If you become aware of a situation in which workplace violence has happened or has been threatened, immediately report your concerns. If someone is in immediate danger, do not hesitate to contact your local authorities or follow your internal emergency procedures first.
- **Firearms, knives or other dangerous weapons** should

never be brought onto company property.

- **If you believe the situation involves an immediate risk of injury to you or others**, contact Wellmark Security staff. Click here to access emergency numbers available through Wellmark Web.

USE OF DRUGS AND ALCOHOL

Wellmark's work environment is alcohol and drug-free. Abuse of alcohol or drugs can be a serious problem in the workplace. It can pose a threat to our own health and safety as well as the productivity of our organization and the well-being of others.

Employees, business partners and our guests must not use or consume alcohol, illegal drugs or other controlled substances in the workplace, except for prescribed medication used for medical treatment.

You are always expected to report to work on time and in an appropriate mental and physical condition to perform your assigned job.

Consumption of alcohol in any vehicle used for Wellmark business or driving under the influence while intoxicated or impaired on Wellmark business is prohibited.

Management may approve the serving of alcoholic beverages at company and nonprofit events. In these cases, prior approval from the chief executive officer or designee is required. We must follow appropriate liquor laws, and Wellmark policies and avoid excessive drinking or intoxication at any work-related events.

Q&A

Q: I am licensed to carry a firearm that I usually keep in the vehicle I use to drive to work. Is this a problem?

A: Yes. You cannot bring your firearm with you to work and leave it in your vehicle in the parking ramp or garage, even if you leave it secure in your vehicle, regardless of whether you possess a permit under applicable law.

Q: I've noticed some practices in my area that don't seem safe. Should I speak up? I'm new here and don't want to be considered a troublemaker.

A: Discuss your concerns with your leader. There may

be good reasons for the practices, but it's important to remember that at Wellmark, raising a concern about safety is never viewed as causing trouble. It is being responsible. If your concerns are not resolved by notifying your leader, contact any of the other resources listed in this Code of Conduct.

*Additional information can also be found in the Corporate Policy, Violence in the Workplace & Threat Management in the Wellmark Policy Manual and on the **Physical Security homepage** of the intranet.*

A promise to our company

We share a responsibility to do our part to build and sustain Wellmark's good name and reputation. We are expected to perform our jobs in an honest, responsible manner and make business decisions that reflect Wellmark's commitment to integrity. By doing so, we help preserve and protect our reputation as a trustworthy company.

Speaking on behalf of our company

Having a clear and consistent voice is important when providing information to the public and the media. For this reason, it is important only designated staff from Wellmark's Corporate and Marketing Communications department speak with the press on behalf of Wellmark. Employees outside of Corporate and Marketing Communications are prohibited from representing Wellmark in media interviews without prior approval from Corporate and Marketing Communications.

Your responsibilities:

- **Communicate honestly and openly** with those who have an interest in Wellmark, including colleagues, suppliers and members.
- **If you receive a question from the media** about Wellmark's business, refer it to the Wellmark public relations team.

- **If you are involved in preparing documents** for official disclosures, public communications or filings with government agencies, be fair, accurate, timely and clear.
- **Conferences and external presentations** are an excellent way to share our expertise with others. If discussing Wellmark procedures or documents, the presentation must be reviewed by leadership and may also need to be reviewed and approved in advance by the legal department and/or Corporate and Marketing Communications.

For more information, see the **Guidelines for Release of Information to the Media**.

Using social media

Social media is an important way to conduct work-related communications. If used appropriately, social media can be an effective way to share information regarding our business, however if not done properly, it may expose you and Wellmark to additional risk.

Your responsibilities:

- **When using social media**, never give the impression you are speaking on behalf of Wellmark unless you are authorized to do so. If it is revealed you are an employee, make it clear your views are yours alone.
- **Never post information about or discuss any product, strategy or company operations** unless approved by the legal department. The exception to this is the Corporate and Marketing Communications department. They have accountability to maintain social media and website information and must follow their internal department guidelines for posting and publishing such information regarding Wellmark's business.
- **All users of social media should follow the same principles** expected in their other behavior at work and outlined in this Code of Conduct. Any harassment, bullying, discrimination or retaliation that would not be permissible in the workplace is not permissible online.
- **If you read an online comment about Wellmark** you believe is wrong or harmful to our reputation, bring it to

the attention of your leader or Corporate and Marketing Communications.

Company resources

Each of us is responsible for protecting Wellmark's property and assets. This includes our facilities, equipment, supplies, computers and all information systems, confidential information and funds. Always use our property and assets responsibly, protect them from theft, carelessness and waste, and use them only for legitimate business purposes.

Our resources and confidential information should not be used for personal benefit or gain, such as conducting a business of your own or making investment decisions.

Your responsibilities

- **Occasional personal use of assets such as our computers, telephones and supplies is permitted, but:**
 1. The use must not be harmful to the business, the reputation of Wellmark or any individual associated with the company.
 2. It should not involve accessing, downloading, creating, storing or sending content that others might find offensive.
 3. Company assets must never be used for any outside business interests or for personal gain.
 4. Should not otherwise violate other provisions of our Code of Conduct.

Our resources and confidential information should not be used for personal benefit or gain, such as conducting a business of your own or making investment decisions.

- **Use meal, travel and entertainment funds for business purposes only** and in a manner consistent with your job duties and Wellmark's needs, resources and policies. For more information refer to Travel Business Expense section in the Staff Guide.
 1. Business expenses should be reasonable, necessary and cost-effective.

2. Expense reports should include full documentation for the expense, including the amount, date, business purpose and attendees.
 3. Business entertainment is not an allowable expense in connection with any federal government program.
- **Never sell, lend or donate** our property or assets without senior leadership approval.
 - **Protect your user IDs, passwords and PINs.** Do not share them with anyone, including other employees. Whether in the office or traveling always keep your company-owned laptop, mobile devices and digital storage media safe and secure. Access Control Policy.
 - **Always comply with computer software copyrights** and with the terms and conditions of all software licenses, even if the software is free of charge. Acquisition, Use and Control of Wellmark Technology Assets Policy.
 - **Limit your use of our email system for personal communications** and remember anything you put on the Wellmark systems may be subject to monitoring by the company.

Q&A

Q: I have an online jewelry business that I operate from home, usually on the weekends. On days when I finish lunch early, can I use my office computer to process orders from the previous day?

A: No you may not. Our policies prohibit you from carrying out non-Wellmark business on our computers and information systems. You must run your home business at home, on your own time and using your own equipment.

LEARN MORE

- Data Governance and Use of Unique Person Identifiers
- Use of Wellmark’s Information Network
- Receipt, Storage and Disposal of Protected Health Information and Other Confidential Wellmark Information

- Safeguarding Workstations for Protected Health Information and Other Confidential Wellmark Information

Confidential business information

Protecting Wellmark’s intellectual property and trade secrets is critical to the work we do. While Wellmark has implemented physical and technical safeguards, such as secured entrances and systems monitoring, it is up to everyone to carefully handle the confidential business information we access. The release of confidential business information is not permitted without prior approval from senior leadership.

Which business information is confidential?

The business affairs and records of Wellmark should be treated as confidential — whether they are in electronic, sound, picture or written form. This includes, but is not limited to:

- Wellmark’s business and marketing plans
- Company initiatives
- Innovations and designs
- Patents, trademarks and copyrights
- Trade secrets, like Wellmark’s rating methodology or our claims procedures
- Systems, software and technology

STAY INFORMED: THE DEFEND TRADE SECRETS ACT (DTSA) IMMUNITY

Under the federal Defend Trades Secrets Act, you may be entitled to immunity and protection from retaliation for disclosing a trade secret in certain circumstances, like in the reporting of a suspected law violation or in a complaint made under seal in a lawsuit. For more information, view our **Defend Trade Secrets Act Required Immunity Notice.**

Your responsibilities

- **Prevent unauthorized access to our information.**
 1. Do not use your cell phone or tablet to take pictures of whiteboard or notes from meetings or planning sessions.
 2. Do not send confidential business information to your personal email account(s). If you need to access your work information away from the office, use Citrix to ensure proper security.
 3. It is prohibited to use a cell phone or other mobile device (including a Wellmark device) to send confidential personal (PII and PHI) or business information via text or other messaging apps.
- **Remember any work you create in your role here** (e.g., presentations, research, project plans, etc.) **belongs to Wellmark.**
 1. Do not use, sell, copy or distribute your work product outside the company unless specifically authorized by a senior leader.
 2. Do not retain a copy unless it is for Wellmark business purposes.
- **Do not create any printed or electronic copies** of any Wellmark work product for personal use without written permission from a member of Senior Leadership.
- **Respect the intellectual property of others.** Use copyrighted material, software and services in accordance with the owner's guidelines or terms of our contract.
- **The obligation to preserve confidential information** is ongoing, even after your employment at Wellmark ends.

Q&A

Q: I created a sales presentation for a client, and I would like to keep a copy for my portfolio. Is this OK?

A: All work you create as a result of your position here becomes the property of Wellmark. The sales presentation should only be used for Wellmark business purposes, and maintaining it for your personal use and

reference is a violation of our Code of Conduct. Contact your leader or Compliance Office with questions.

Q: Can I email open enrollment materials to my personal email to discuss with my spouse?

A: Yes. Information such as your benefits, job performance and Pathways to Wellness, for example, are considered personal materials that can be printed or emailed to your personal email.

Q: I will be leaving Wellmark for another job shortly. While at Wellmark, I created a scorecard we used in my business area to track key metrics. Before I leave I'd like to email the scorecard to my personal email so I can use it on my new job. Is this OK?

A: No it is not allowed. Since you created the scorecard as part of your work here, it belongs to Wellmark. In addition, your obligation to protect our confidential information continues even after you leave the company.

Records management

Business partners, government officials and others rely on us to comply with financial reporting and accounting regulations and ensure accounting and financial information is accurately reported.

From insurance claims and regulatory reporting to timecards and expense reports, records management is a vital part of day-to-day business for many Wellmark employees. Our company relies on the accuracy and timeliness of these records to fulfill our obligations to our company, members, business partners, regulatory agencies, government entities and the public.

These records include, but are not limited to, all internal or external communications, whether by telephone, paper or electronic means.

Your responsibilities

- **Our books, records, accounts and financial statements must be maintained** in reasonable detail, must appropriately reflect our transactions, and must conform to applicable legal requirements and to our internal controls. Accurately and truthfully record,

maintain and manage all books, records, reports and accounts in accordance with:

1. The law
 2. Wellmark's Record Information Management Policy
 3. Legal hold notices
 4. Wellmark's Record Retention Schedules
- **Never make false, misleading, incomplete or dishonest entries** about our business performance.
 - **Maintain Wellmark's internal controls and cooperate** with the company's WellSOX and audit processes.
 - If you have a question about the creation, maintenance, or destruction of records, ask your leader, Legal Department or the Compliance Office for guidance.

STAY INFORMED: LEGAL HOLDS

It is critical you comply with any "legal holds" that require records to be maintained beyond typical retention schedules. This may occur when there is current or anticipated litigation. If you receive a "legal hold," do not destroy, alter or try to conceal any documents that may be necessary for litigation or an investigation. The legal department is responsible for advising when legal holds are instituted and released.

Q&A

Q: I'm an hourly employee who worked 45 hours this week but only entered 40 hours on my timecard. Will I get in trouble for this?

A: Yes. This is a violation of Wellmark's policy of paying all hourly employees for all hours worked, and you may be subject to disciplinary action. You should report this to your leader or human resources, so your timecard can be corrected and you will be compensated for the hours you worked.

Q: I'm preparing a quarterly report of my team's sales numbers. We recently earned the business of a new customer, but the paperwork hasn't been signed yet. This sale could really boost our numbers for the quarter, and I'm confident we will get the completed forms any day. Can I include it in my report?

A: No. All reports must be submitted completely and accurately and should never include false or misleading information. Wait until you have the required paperwork to finalize the sale, and include it in the next quarter's numbers.

Bribery and corruption

Corruption and bribery in all forms are completely contrary to our business standards. We comply with all applicable laws and regulations that forbid bribery both of public officials and individuals within the private sector.

There can be severe consequences if we or a business partner acting on our behalf violates anti-bribery laws. Even the perception by others that we may have acted illegally can be damaging. For this reason, always be aware of how our actions might be viewed by others and ask questions if you have any doubt about the appropriateness of a gift, entertainment or relationship with a third party.

We also comply with all money laundering laws and will only conduct business with reputable customers involved in legitimate business activities.

Your responsibilities

- Do not give or accept bribes or kickbacks, offer facilitation or 'grease' payments, or accept or provide any other kind of improper payment.
- Keep accurate books and records so payments can be honestly described and documented.
- Report any suspicious financial transactions and activities to the Compliance Office.
- Be aware of our anti-corruption and bribery standards when selecting third parties that provide services on our behalf. Be vigilant and monitor their behavior. Never look the other way.
- Be aware that not reporting a bribe or other illegal activity may in itself be an offense and make you equally guilty.

STAY INFORMED: KEY DEFINITIONS

Bribery — giving or receiving undue value (or offering to do so) to influence the behavior of someone in government or business in order to obtain a business, financial or commercial advantage.

Corruption — dishonest or illegal behavior, especially by powerful people (such as senior leaders, government officials or others in positions of authority) for personal gain.

Facilitation payments — payments or gratuities to a government official intended to encourage the official to perform (or ignore) his or her responsibilities.

Money laundering — the process of converting illegal proceeds so that the funds appear legitimate.

STAY INVOLVED: MONEY LAUNDERING RED FLAGS

- Any transaction in which the nature, size or frequency appears unusual
- Overpayment of premium with a request to refund the excess to a third party or to a different country
- Early cancellation of policies with return of premium, particularly where:
 1. A number of policies entered into by the same insured or intermediary for small amounts and then canceled at the same time
 2. Return premium being credited to an account different from the original account, or requests for return premiums in currencies different from the original currency
 3. Regular purchase and cancellation of policies

Q&A

Q: A supplier asked that we send payments to a new address. I'm suspicious there might be something illegal or inappropriate going on. What should I do?

A: You're right to be suspicious. This may be an effort to launder money or to otherwise avoid legal requirements. You should contact the procurement department without delay and in the meantime, do not

change the address until you are directed to do so. If possible, avoid further discussions with the supplier about the request until you receive further direction.

Working with the government

Working with the government requires us to abide by additional rules and regulations. From administering government contracts to complying with government investigations, we conduct these activities in a manner that is in compliance with all applicable laws, regulations and ethics rules.

If you work in an area that supports a government program, including Medicare or the Federal Employee Health Benefit Plan (FEP), work with your leader to understand the differences in the way our guidelines apply to you and your job.

Your responsibilities

- **Provide current, timely, complete and accurate information** for all government contracts and requests for information.
- **Understand and follow our gifts and entertainment policy.** In particular, be aware that the restrictions on gifts and entertainment are more stringent when doing business with government officials. See the section on Gifts, Entertainment and Hospitality.
- **Follow federal guidelines** for business expense reporting, travel and other activities if you are involved with federal government programs, such as FEP.
- **Do not employ or contract** with persons or entities that have been excluded from doing business with the federal government.
- **If you work with the Medicare Part D** product in any way, complete all required training and reporting.
- **If you are contacted by a government investigator,** receive a subpoena or written request for information, or are asked to discuss or turn over information to anyone outside of Wellmark in connection with your

employment, immediately notify the legal department so they can take the appropriate action.

- **Cooperate fully with government investigators**, but obtain authorization from the legal department before providing documents or data that belong to Wellmark or its subsidiaries.

STAY INFORMED: PENALTIES FOR FALSE CLAIMS AND FRAUD

Our interactions with the state and federal government must comply with a special set of regulations, and the penalties for false claims and fraud in these interactions can be significant.

A VIOLATION OF:

- **Federal False Claims Act** — Can result in \$5,500–\$11,000 penalty per claim and exclusion from federal healthcare programs.
- **Federal Program Fraud Civil Remedies Act of 1996** — Can result in \$5,000 penalty per claim plus an assessment of twice the amount of any unlawful claim.
- **Iowa False Claims Act** — Can result in \$5,500–\$11,000 penalty per claim and a multiplier of up to three times per claim.

STAY INFORMED: PRIOR CRIMINAL CONVICTIONS AND DELEGATION OF AUTHORITY

Wellmark has a legal obligation to identify and consider for exclusion from its business operations workforce members whose prior conduct was illegal or otherwise inconsistent with the administration of an effective ethics and compliance program. To meet this obligation:

We conduct pre-hire criminal background checks. We conduct periodic checks of employees against federal and state debarment and exclusion databases.

We will not hire, retain, engage or contract with any individual or organization whose name appears on a federal or state debarment listing.

We will not delegate substantial discretionary authority to anyone who we know, or through the exercise of due diligence should have known, to have a propensity to

engage in inappropriate, improper or illegal conduct.

If you have been convicted of criminal conduct or excluded or prohibited from participating in a federally funded program immediately notify the legal department or the Compliance Office.

Q&A

Q: I completed the required compliance training last year, do I need to complete it again this year?

A: Yes. All employees are required to complete the compliance training on an annual basis.

Q: I work on the Medicare Part D product, and I completed training last year. Do I need to take it again?

A: Yes. Anyone working on the Medicare Part D product must complete training annually. If you have not completed or been given access to this training, please email the [Ethics & Compliance](#) mailbox on the global mailbox listing.

A promise to our community

As a mutual insurance company owned by our members throughout Iowa and South Dakota, we know what's important. We are passionate about helping improve the health and well-being of our members and serving the communities where we live and work.

Human rights

We conduct our business in a manner that respects the human rights of all. Wellmark will not tolerate abuse of human rights in the workplace and we contractually require our vendors to do the same.

We are proud the very nature of our work promotes well-being and enriches the lives of those we serve. In addition, our business operations create employment opportunities, enhance economic and social well-being, and improve the communities where we operate.

Your responsibilities

- **Remember, human rights begin with respect for others** and is demonstrated through our daily interactions with employees and members and includes providing equal employment opportunity, accommodating disabilities, and doing our part to protect the rights and dignity of everyone with whom we do business.
- **Report any suspicion or evidence of human rights abuses** in our operations or in the operations of our vendors.

Environmental stewardship

Looking out for the well-being of our members includes helping create and maintain a healthy environment. Wellmark takes pride in being energy and resource-efficient. The Des Moines headquarters attained LEED Platinum™ status, and we recognize our responsibility to reduce our environmental impact and make meaningful contributions to environmental causes. We comply with all applicable environmental laws and regulations where we operate.

Your responsibilities

- **Be proactive and look for ways to** reduce, reuse and recycle waste, and use energy and water more efficiently.
- **Speak up if you have suggestions** about ways to improve our conservation and sustainability efforts.
- **Take account of environmental responsibility** as a factor in business decision making.

Community involvement and corporate citizenship

Wellmark and our employees have a reputation of being good citizens and neighbors. We believe in maintaining the health and welfare of the communities we serve and

recognize charitable contributions and volunteerism are important components of this commitment.

Many of our employees support local educational, cultural, charitable and civic activities. We encourage community engagement and civic responsibility. While this activity is welcomed, keep in mind it is voluntary and has no bearing on your performance evaluation or your employment at Wellmark.

In addition to the individual contributions of time and resources made by our workforce, as a company we also provide support and funding to organizations and events in Iowa and South Dakota through The Wellmark Foundation.

Your responsibilities

- **Avoid outside activities that would have a negative impact** on your job performance or damage Wellmark's reputation in the community.
- **If you volunteer to help local civic organizations,** be sure your participation does not interfere with your work.
- **Soliciting or pressuring customers, business partners or other staff members** to support your favorite charities or causes is not allowed. This is especially important for leaders. Even a request from a leader for a voluntary contribution can be perceived by an employee as inappropriate pressure.

Q&A

Q: My child's school is doing a fundraiser. Can I bring sales catalogs and order forms to work to share with my coworkers?

A: No. Soliciting coworkers for any charity, cause or business is not allowed.

Political activities and lobbying

We encourage all workforce members to vote and be active in the political process as individual citizens. However, your involvement in politics must remain separate from your responsibilities as an employee.

It's important to note both federal and state laws regulate lobbying of public officials. Federal law also restricts the use of corporate funds in connection with federal elections, and as a result, it is against Wellmark policy to reimburse you directly or indirectly for any political contributions.

Your responsibilities

- **Do not use Wellmark funds, facilities, time, assets or resources** to support your personal political activities.
- **Ensure your personal political views and activities** cannot be perceived as those of Wellmark.
- **Do not participate in any political activity** that could be construed as involving Wellmark in a way that is illegal or unethical.
- **Interactions with government officials or regulators** that could be seen as lobbying must be discussed in advance and coordinated with your leader and GovernmentRelations@wellmark.com.

- **Never apply direct or indirect pressure on another** employee, customer or business partner to contribute to, support, or oppose any political candidate or party.
- **Avoid even the appearance that you are making political or charitable contributions** in order to gain favor or in an attempt to exert improper influence.
- **Holding or campaigning for political office** must not create, or appear to create, a conflict of interest with your duties.

Q&A

- Q:** I will be attending a fundraiser for a candidate for local office. Is it OK to list my position at Wellmark, as long as I don't use any company funds or resources?
- A:** No. You may not associate Wellmark in any way with your personal political activities. It's permissible to attend the fundraiser, but listing your position could be construed as an endorsement of the candidate by Wellmark.
- Q:** Does Wellmark allow employees time off for voting?
- A:** Wellmark encourages all employees to vote, and polling locations are open outside of normal working hours. Additionally, there are options to cast your ballot early. If your working hours do not permit you to vote, contact your leader to work out an arrangement to allow you to vote.

Closing thoughts

On behalf of the Board of Directors and the entire leadership team, we want to thank you for your attention to our Code of Conduct and your ongoing commitment to compliance.

Given the complex business and regulatory environment in which we operate, we know there will be times when you will be unsure of what actions are required. To help you in such situations, the Board and senior leadership established Wellmark's Business Ethics and Compliance program, including the Ethics Hotline and this Code. The Board is committed to promoting an organizational culture encouraging ethical conduct and a commitment to compliance. They have the responsibility to recognize, support and provide oversight for our Business Ethics and Compliance program, ensuring we have adequate resources to be fully committed to compliant, lawful and ethical conduct.

Please use these resources whenever you need additional guidance and remember you have a responsibility to report any suspected activity that does not meet our high ethical standards. You will never face retaliation for raising a concern in good faith.

We Are All In when it comes to ethics and compliance. Stay informed, involved, and invested in our success. Always act with integrity. Help create a culture that is open and includes others. When in doubt, ask questions and inquire.

Take our commitment to working with integrity to heart and make sure your actions reflect our standards. By doing so, you help us preserve our members' trust and Wellmark's reputation.



W. CURT HUNTER
CHAIR OF COMPLIANCE COMMITTEE



PETER KITUNDU
CHIEF COMPLIANCE OFFICER

