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# Medica Standards of Conduct

BUSINESS PARTNERS

## MISSION

To be the trusted health plan of choice for customers, members, partners, and our employees.

## VISION

To be trusted in the community for our unwavering commitment to high-quality, affordable health care.

## VALUES

Customer Focus | Excellence | Stewardship | Integrity | Diversity

# Leadership commitment



*“These Standards of Conduct are critical to ensure we conduct ourselves ethically and with integrity, both internally at Medica, as well as externally in our communities.”*

Earning the trust of those we serve is central to what we do each and every day, and our mission is anchored in this. It's incredibly important that all of our stakeholders — and the communities we serve — trust us. Relationships are built on mutual trust. And those relationships — with members and customers, providers and business partners, government agencies, and regulators — are all key to our long-term health as a business and as a corporate citizen.

Our Standards of Conduct spell out expectations for proper business conduct, ethical professional practices, and legally appropriate activities. These standards aren't just words, and they're not here just to meet legal and regulatory requirements. They're important tools all of us should use on a day-to-day basis to help guide our behavior and decision-making. These standards are critical to ensure we conduct ourselves ethically and with integrity, both internally as well as externally in our communities.

If you see something that doesn't appear right, we want you to feel comfortable taking action. It's your responsibility to report the concern without hesitation; it's our responsibility to make certain there's no retaliation against those who make a good faith report of any potential concern. If you'd like to remain anonymous, we have a confidential integrity line as well. Our leadership team takes our commitment very seriously and will listen to all concerns brought forward and deliver a fair resolution promptly and consistently.

Please take time to read the Standards of Conduct document carefully and be aware of the various policies and resources available to you.

Sincerely,

A handwritten signature in black ink that reads "Lisa Erickson".

**Lisa Erickson**  
President and CEO  
Medica

## A Message from Medica's Vice President of Compliance



We're committed to conducting business with the highest standards of integrity, ethical behavior, and business practices. As a result, we've implemented a compliance program that supports these standards and created the Medica Standards of Conduct to help you understand expectations for how we do business and outline your responsibilities as a vendor that provides goods or services to Medica or our members. Importantly, as a Minnesota Department of Human Services (DHS) and a Centers for Medicare and Medicaid Services (CMS) contracted organization, and Wisconsin Department of Health Services (WI DHS) contracted organization, we apply these Standards of Conduct to certain business partners (first tier and downstream entities).\*

Our compliance program supports an ethical culture by establishing a system that focuses on:

- » Preventing, detecting, and correcting legal and regulatory compliance issues
- » Ensuring commitment to and compliance with applicable federal, state, and contractual requirements
- » Establishing and supporting systemic methods and controls that reduce significant legal, financial, and reputational risks for us and our customers
- » Promoting positive employee behavior within our organization and with everyone else who has contact with us

Written standards and procedures, training and education, active auditing and monitoring, disciplinary action, mandatory reporting of non-compliance, and active response and resolution to identified compliance matters are all fundamental to our compliance program. Communicating expectations for ethical behavior and how we do business is also fundamental to our program.

The Standards of Conduct that follow provide you with important principles and help establish expectations for how first tier and downstream entities must conduct themselves to confirm and protect our integrity.

Thank you for your contributions to Medica and for your continued commitment to doing the right thing every day.

A handwritten signature in black ink that reads "Milly Koranteng". The signature is fluid and cursive.

**Milly Koranteng**  
Vice President, Compliance  
Medica

*"Always do right. This will gratify some people and astonish the rest."* **Mark Twain**

\* "First tier" entity means any party that enters into a written arrangement with Medica to provide administrative services or health care services for Medicare eligible individuals. "Downstream entities" are parties that enter into an acceptable written arrangement below the level of the arrangement between Medica and a first tier entity. These written arrangements continue down to the level of the ultimate provider of health and/or administrative services. For purposes of this document, "first tier" and "downstream entities" include "subcontractor" as that term is used in the disclosure of ownership provisions of the contract between Medica Health Plans and DHS as well as Dean Health Plan and Wisconsin Department of Health Services.

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# Standards of Conduct

## Introduction to the Standards of Conduct

The guide that follows presents the **Standards of Conduct** for all of Medica's first tier and downstream entities. Our **Standards of Conduct** are intended to serve as guiding principles for how Medica and first tier and downstream entities conduct themselves while doing business with our members and customers, providers and business partners, government agencies, and regulators.

The principles included in our **Standards of Conduct** reflect our commitment to:

- » Demonstrate ethics and integrity and follow our corporate policies, supporting the organization's mission to be the trusted health plan of choice
- » Adhere to a high standard of business conduct that promotes trust among our customers, members, partners, employees, and community
- » Maintain a culture that fosters open communication, transparency, and the expression of diverse points of view
- » Encourage the reporting of ethical, compliance and fraud, waste, and abuse concerns without fear of retaliation
- » Protect confidential and privileged information, including our members' health information
- » Act in an ethical and respectful manner, free from harassment, coercion and discrimination, to ensure all individuals we work with inside and outside our organization feel safe and respected
- » Make sound, disciplined financial decisions as stewards of our customers' funds

Medica Health Plans, Medica Community Health Plan, and Medica Insurance Company, Medica Central Health Plan, Dean Health Insurance, Inc., and Dean Health Plan, Inc. are health plan companies with respective Medicare contracts. Medica Health Plans also has a contract with the Minnesota Department of Human Services for administration of Minnesota Health Care Programs and is committed to complying with all state and federal regulations and standards that apply to Minnesota Health Care Programs. Dean Health Plan, Inc. has a contract with Wisconsin Department of Health Services for participation in BadgerCare Plus, as a Health Maintenance Organization (HMO) in approved counties in Wisconsin. Dean Health Plan, Inc. has entered a contract with the Office of Personnel Management (OPM) to offer health coverage to federal employees in approved counties in Wisconsin. Dean Health Plan, Inc. has signed an Employee Trust Fund (ETF) contract with the State of Wisconsin to offer benefits to the employees of the State of Wisconsin. All companies are committed to complying with federal and state regulations and standards.

Medica Health Plans, Medica Community Health Plan, Medica Insurance Company, Dean Health Plan, Inc., Medica Central Health Plan, and Medica Central Health Insurance Company are also issuers of qualified health plans on both federally-facilitated and state-based marketplaces and are committed to complying with the applicable federal and state regulations including Patient Protection and Affordable Care Act.

Upholding these standards and Medica's internal policies and procedures, as well as complying with all laws and regulations that guide our business, is the responsibility of every Medica business partner.

## INTEGRITY

The conduct of our company and our employees must be pursued in a manner that's ethically responsible, fosters trust, and commands respect for its integrity.

### Application of the Standards of Conduct

We believe very strongly in the principles outlined in the **Standards of Conduct** and take our responsibility to uphold these principles seriously. It's the responsibility of our first tier and downstream entities to demonstrate behavior consistent with these standards. Should a provider, sales agent, vendor, supplier, customer, volunteer, or affiliate exhibit behavior inconsistent with the standards, a thorough investigation will be conducted in accordance with our policy. Depending on the severity and circumstances of the situation, we will take action to remedy the situation, which may result in termination of contract, potential indemnification to Medica for Medica's payment of regulatory agency financial penalties, and potential reporting of the conduct to law enforcement and the appropriate regulatory agencies.

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### Your responsibilities and resources

- » All of our first tier and downstream entities are required to read, understand, and follow Medica's policies and **Standards of Conduct**.
- » If you have questions or concerns about our compliance program, these **Standards of Conduct** or our policies, you should talk with Medica's Compliance Officer. For anonymous reporting, you may contact the Medica Integrity Line 24 hours a day, 7 days a week at **1 (866) 595-8495**.
- » All first tier and downstream entities have an obligation to report non-compliance as outlined in these **Standards of Conduct**.

Use this QR code to contact Medica's Integrity Line



# Compliance + Fraud, Waste + Abuse Oversight programs

## *We have a duty to live up to our regulatory responsibilities*

Because our work involves serving members in many communities, it naturally falls into the public spotlight. Everything said and done must meet professional and ethical standards. The only course of action you should ever take is to do what is right, every time and under every circumstance. You've made a promise to do what's right through your contractual arrangement with us, and you're bound to do whatever is necessary to honor that promise.

### **Medica is an organization serving government programs**

Medica Health Plans, Medica Community Health Plan, and Medica Insurance Company, Medica Central Health Plan, Dean Health Insurance, Inc., and Dean Health Plan, Inc. are health plan companies with respective Medicare contracts. Medica Health Plans also has a contract with the Minnesota Department of Human Services for administration of Minnesota Health Care Programs. Dean Health Plan, Inc. has a contract with Wisconsin Department of Health Services for participation in BadgerCare Plus, as a Health Maintenance Organization (HMO) in approved counties in Wisconsin. Dean Health Plan, Inc. has entered into a contract with the Office of Personnel Management (OPM) to offer health coverage to federal employees in approved counties in Wisconsin.

Our management is firmly committed to complying with all applicable federal and state standards, including state and federal law, regulations and program manuals, and with the Federal and State False Claims Acts, the Anti-Kickback Statute, the STARK Statute, and HIPAA. We employ policies and procedures to ensure that illegal remuneration is not permitted. If any unlawful remuneration scheme is uncovered, we will take appropriate steps such as suspension of payment for a credible allegation of fraud, contract termination for a reasonable belief of fraud or abuse, and potential reporting of the conduct to law enforcement and the appropriate regulatory agencies.

Our management fully supports the Compliance Reporting, Investigations and Prompt Response Policy that requires reporting of non-compliance with any law, or policy. You may report any concern related to our business 24 hours a day, 7 days a week by calling the Medica Integrity Line at **1 (866) 595-8495**.



## *We're all expected to do what is right*

### **Reporting a compliance concern or incident (Medica Integrity Line)**

Laws, regulations, and organizational policies can be complex and sometimes confusing. While we expect that our representatives try to do what is right, the right thing to do may not always be clear.

To avoid confusion and to facilitate compliant behavior, all first tier and downstream entities are expected to promptly report any good faith belief of a violation of the laws and regulations that govern our business.

Compliance reports may include:

- » Questions or concerns about fraud, waste, and abuse
- » Possible violations of laws or regulations
- » Questions about ethical business behavior
- » Concerns about possible violations of our policies
- » Concerns about financial reporting

No first tier or downstream entity will suffer any penalty or retribution for reporting in good faith any suspected misconduct or non-compliance. We are in compliance with protection under enhanced whistleblower rights under 41 U.S.C. Section 4705.

Any first tier or downstream entity that knows of, but fails to report, suspected misconduct or non-compliance may be subject to termination of contract.

Our employees are protected under enhanced whistleblower rights under 41 U.S.C. Section 4705.

#### **WAYS TO REPORT ANY COMPLIANCE CONCERN OR QUESTIONS**

- Medica Integrity Line: **1 (866) 595-8495**  
(Available 24/7 | Anonymous Option)

#### **RELATED RESOURCES**

- Refer to the Medica Compliance Reporting, Investigations and Prompt Response Policy for additional guidance

# Always conduct yourself with integrity

## Fraud, waste, and abuse prevention and reporting

First tier and downstream entities are obligated by law to comply with the fraud, waste, and abuse laws, which have a significant impact on health care and health insurance costs.

Fraud, waste, and abuse deterrence is not only a good business practice by us and our first tier and downstream entities, but also contributes to the efficiency and quality of the health care system.

We closely examine allegations of fraud, waste, and abuse, investigate evidence, and seek appropriate remedies.

The Federal and State False Claims Act has what is known as whistleblower protections. Individuals with specific knowledge of false claims submissions have the right to file a claim and will be protected under both the Federal and the State False Claims Act for doing so.

We are also committed to complying with the requirements of the Foreign Corrupt Practices Act.

### WHAT IS EXPECTED OF FIRST TIER AND DOWNSTREAM ENTITIES:

- Report any incidence of suspected fraud, waste or abuse, including Medicaid or Medicare fraud, waste or abuse, to Medica's Special Investigations Unit ("SIU")
- Widely publicize to your employees and first tier and downstream entities methods for reporting non-compliance and fraud, waste, and abuse
- Take disciplinary action with employees when non-compliance or unethical behavior is involved and action under contract with first tier and downstream entities

### WAYS TO REPORT A FRAUD, WASTE, OR ABUSE CONCERN OR QUESTION:

- FWA Referral Form on Medica.com
- Send an email to SIU\_Mail@Medica.com
- Medica Integrity Line: **1 (866) 595-8495**  
(Available 24/7 | Anonymous Option)
- CMS via MEDIC (Medicare only):  
**1 (877) 772-3379**

*"Whoever is careless with the truth in small matters  
cannot be trusted with important matters."* Albert Einstein

## *Cooperate fully with regulatory authorities*

### **External audits and reviews**

We are in a regulated industry that requires us to uphold ethical and business standards at all times.

External parties often perform audits of our financial statements, operations, and business practices. These parties may include independent auditors and federal and state government regulators and inspectors.

Our policy is to fully cooperate with auditors and to provide them with all necessary information.

First tier and downstream entities must not conceal, destroy or alter any documents before or during an audit or inspection.

Never provide inaccurate information or obstruct, mislead, or delay communication of information or records required to support the audit or review process.

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## *Uphold the law at all times*

### **Illegal activities**

Our first tier and downstream entities must not engage, directly or indirectly, in any corrupt business practices or other illegal activities. Illegal activities include, but are not limited to, fraud, embezzlement, or kickback arrangements.

We will not tolerate illegal activities. Those who commit illegal acts, or cause us to commit illegal acts, will be dealt with in accordance with applicable company policy, and with federal and state laws that govern such illegal activities.

If you know of or suspect any illegal activity, you are obligated to report it immediately to us using one of the methods identified in Medica's Compliance Reporting, Investigations and Prompt Response Policy.

If you are unsure about whether a particular process or action may violate a law or regulation, ask before you act.

# Business excellence, integrity, + legal responsibility

We value our role as an industry and community leader in health care. We're committed to innovation, creative problem-solving and service excellence. Actions speak louder than words. Your personal integrity and our integrity as an organization can't be separated.

Our first tier and downstream entities are responsible for administering our affairs honestly and prudently. It's never acceptable to use your position or business relationships to profit personally or help others to profit personally at our expense.

*"Integrity is doing the right thing. Even when no one is watching."* C.S. Lewis

## EXCELLENCE

To achieve customer satisfaction, we must strive for excellence in everything we do — in our products, our services, our human relations, our competitiveness, our timeliness, and in our execution of large and small tasks.

## *Never compromise the integrity of our business relationships*

### **Conflicts of interest**

A conflict of interest is any behavior that might compromise or give the appearance of compromising your integrity, creating a situation in which your personal interests are, or appear to be, favored over legitimate business interests.

First tier and downstream entities must effectively screen their governing bodies and senior leadership for any actual or potential conflicts of interest at the time of hire and on an annual basis thereafter.

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## *Intellectual property must be safeguarded*

### **Intellectual property**

Information, ideas, and intellectual property are assets of Medica and are important to our success. Intellectual property describes concepts and creations generated within the human mind. Federal laws that govern patents, trademarks, copyright, and design protect these concepts.

Intellectual property, including patents, trademarks, copyrights, software, etc., must be managed and maintained to preserve and protect its value.

Information pertaining to our competitive position or business strategies, payment, and reimbursement information, and information relating to negotiations with employees or third parties should be protected and shared only with authorized individuals having a need to know such information to do their jobs.

Our intellectual property should be treated as business confidential information and should not be disclosed to any third party without agreement from Medica.

# Privacy + security programs

## *Our duty of confidentiality must not be broken*

Everyone who works with sensitive, confidential, or proprietary information has been entrusted with a great responsibility. The trust that has been placed in you must not be taken lightly. We expect all first tier and downstream entities to maintain the confidentiality of the information accessed, used, and maintained to do Medica's work.

## *We honor the trust placed in us*

### **Duty of confidentiality**

First tier and downstream entities are required to protect confidential information and any trade secrets that belong to Medica. We prohibit the unauthorized disclosure of confidential and proprietary information which includes, but is not limited to, information related to our operations, information systems, technology, and business systems.

Examples of confidential information include, but are not limited to:

- » Financial, marketing, and statistical data
- » Competitive information
- » Member information and claims histories
- » Budgets
- » Processes
- » Techniques
- » Bid proposals, contract negotiations, and contracts
- » Research and development
- » Business reports and summaries
- » Provider and customer information
- » Information systems and technology
- » Business strategies and plans

## CUSTOMER FOCUS

Our work must be done with all our customers in mind. We're dedicated to providing our customers better value and service than our competitors.

## *Protecting privacy is the right thing to do*

### Reporting a privacy or security concern or incident

We respect the privacy of our members. We also place the highest priority on protecting and securing our members' protected health information (PHI), along with our business-confidential and restricted information (e.g., certain tax, financial and legal information). We do this in keeping with our professional and ethical standards and the laws, regulations and agreements that apply to our business.

PHI must only be used and disclosed to the extent as needed to conduct treatment, payment, and health care operations, as permitted by law, or to comply with legal, regulatory, or accreditation requirements.

All first tier and downstream entities must safeguard PHI and business confidential information in accordance with our Privacy and Security Policies and as outlined in their agreements with us.

You may have access to – and a duty to protect - confidential and restricted information that we own. You have an obligation to protect and maintain the confidentiality and security of such proprietary information, whether in physical or electronic form.

Information resources (e.g., data, reports, e-mail, communications, memos, etc.) must be protected against all forms of unauthorized acquisition access, use, disclosure, modification, or destruction, whether accidental or intentional.

We protect the PHI of applicants, former members, and deceased members just as we protect the PHI of our current members.

### WHAT IS EXPECTED OF YOU

- You may use and disclose only the minimum amount of PHI or business confidential and restricted information necessary to perform the required activity
- Unless expressly permitted by contract, you may not release: (i) PHI to another vendor and, if permitted, you may do so only with a signed business associate agreement; or (ii) business-confidential and restricted information to any third party
- You must transfer data securely when releasing PHI or business confidential information by using encryption, a Virtual Private Network, or other secure transmission

### TO REPORT A PRIVACY CONCERN OR QUESTIONS, CONTACT:

- Privacy & Security Incident Report Form on Medica.com Vendor Information web page
- Your Medica Contract Manager
- Send an email to [Privacy@medica.com](mailto:Privacy@medica.com)
- Medica's Privacy Officer or a member of Medica's Privacy team

# Healthy work environment

## *We all contribute to a healthy work environment*

We believe that our success as an organization depends upon our ability to collaborate and communicate effectively with our first tier and downstream entities, and everyone else we build relationships with on behalf of Medica. Awareness is an important key to effective communication. We encourage you to take time to consider the effect of your actions and to value diversity in thought and culture. We believe that diversity ensures a healthier and more resilient organization and a healthier community, and ultimately leads to better results in all that we do.

Awareness of health and safety issues, along with our swift responses, promotes a healthy work environment and is important to the quality of working life. Emergencies, disasters, and pandemics are unpredictable, but other environmental issues can be prevented if you're conscious of the health and safety of your work environment. We encourage you to take time to consider the health and safety of your workspace.

### **Health and safety**

Everyone has a responsibility in making the workplace healthy and safe.

### **Harassment-free and drug-free workplace**

We are committed to providing a work environment that is free from harassment based on race, color, creed, religion, national origin, ancestry, sexual orientation, disability, age, gender, maternity, marital status, status with regard to public assistance or any other classification protected by state, federal or local law or ordinance. We expect the same from our first tier and downstream entities.

While on our premises and while conducting business-related activities off our premises, you may not use, possess, distribute, sell, or be under the influence of alcohol, illegal drugs, or any legal drugs (including prescribed drugs) that might cause you impairment or impact your ability to fully or safely perform the functions of your position.



## DIVERSITY • EQUITY • INCLUSION

Unifying our workforce and workplace through learning and development, recruitment, retention, and supplier diversity.

### *Developing an environment where everyone is valued and allowed to be their authentic selves*

**Diverse workforce:** The diversity of our community is reflected in our employees. That diversity is present at all levels and in all roles throughout the health plan. It's an intentional effort for our talent acquisition team to seek out underrepresented candidates.

**Inclusive culture:** All employees are able to contribute their best and feel valued. Systems throughout our organization ensure an inclusive and diverse environment. Training and engagement are deliberately focused on developing a more inclusive culture for all.

**Diverse market:** Local and diverse vendors have equitable access to contracts. We are invested in the economic impact of our neighbors through an emerging Supplier Diversity program.

### *Everyone has the right to work in a professional atmosphere*

#### **Violence-free workplace**

No one may engage in verbal or physical conduct that intimidates or threatens to harm people or property. This includes conduct that has the effect of threatening others, regardless of the intent of the individual.

### *Ethical principles and laws guide our actions*

#### **Equal Employment Opportunity (EEO)**

We will not tolerate discrimination against any employee or applicant for employment because of race, color, creed, religion, national origin, ancestry, sexual orientation, disability, age, gender, maternity, marital status, status with regard to public assistance, veteran status, or any other classification protected by state, federal or local law or ordinance. This policy applies to all aspects of the employment relationship, such as recruitment, compensation, or promotion.

*"As we look ahead into the next century, leaders will be those who empower others."* Bill Gates

## *Financial stewardship is an everyday job*

Good financial stewardship is more than keeping business spending in line. As a nonprofit organization, We must be above question in the administration of our finances. It means carefully considering, reporting, and managing business expenses, charitable contributions, and supplier relationships. Running a successful business requires that we spend money, and it's our responsibility to spend it wisely, not wastefully.

*"Optimism is the faith that leads to achievement."* Helen Keller

## STEWARDSHIP

Using our resources wisely to meet the needs of our members and the communities we serve today and in the future.

### *Provide timely and accurate information*

#### **Financial reporting and accounting practices**

All first tier and downstream entities have an obligation to carry out their contractual obligations in a positive manner by:

- » Acting with honesty and integrity, avoiding actual or apparent conflicts of interest in personal and professional relationships
- » Providing us, our business partners, and members with information that's accurate, complete, objective, relevant, timely, and understandable
- » Complying with rules and regulations of federal, state, provincial, and local governments and other appropriate private and public regulatory agencies
- » Acting in good faith, responsibly, with due care, competence and diligence, without misrepresenting material facts or allowing independent judgment to be subordinated
- » Respecting the confidentiality of information acquired in the course of performing work, except when authorized or otherwise legally obligated to disclose it; confidential information acquired in the course of performing work must not be used for personal advantage

*"The price of greatness is responsibility."* Winston Churchill

# SPEAK UP

## Medica Integrity Line

24 hours a day, 7 days a week

**1 (866) 595-8495**



**P.O. Box 9310, Minneapolis, MN 55440-9310**

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