

Code of Conduct



A MESSAGE FROM OUR PRESIDENT

Dear Fellow Premier Health Insuring Corporation / Premier Health Plan Team Members:

Premier Health Insuring Corporation / Premier Health Plan's (hereinafter referred to as Premier) core values are Respect, Integrity, Compassion, and Excellence. Every board member, employee, or other individuals or entities performing functions or services related to managed care activities on behalf of Premier (i.e., our Team Members) plays an important part in this organization demonstrating those values. This Code of Conduct, also known as the Code, was designed to assist you by increasing your awareness of general compliance issues and business ethics as they apply to our business and day-to-day activities. At Premier, we expect Team Members to "do the right thing" with each and every task they perform.

If you have questions or concerns regarding the Code, then please feel free to contact your manager and / or our Premier's Compliance Division at:

**Attention: Director of Compliance, Health Plan Operations
Premier Health ACO of Ohio
110 North Main, Suite 930
Dayton, OH 45402**

Please know that we respect every Team Member's right to ask questions and report concerns without fear of retaliation. However, if you would like to remain anonymous, then please call the Premier Health Insuring Corporation / Premier Health Plan Compliance Hotline **1-844-348-7822**.

Premier is committed to being an organization that encourages and supports open, honest communications and trust among each and every Team Member.

On behalf of Premier, I want to thank each of you for your commitment to demonstrate the values described in the Code...Premier's values!

Respectfully,



Renee P. George
President
Premier Health Insuring Corporation /
Premier Health Plan

TABLE OF CONTENTS

PREMIER HEALTH INSURING CORPORATION / PREMIER HEALTH PLAN CODE OF CONDUCT SUMMARY	7
I. OUR MISSION.....	11
II. OUR VALUES	11
III. COMPLIANCE WITH LAWS AND REGULATIONS.....	11
IV. FIDUCIARY OBLIGATIONS OF OUR BOARD OF DIRECTORS	12
Duty of Care.....	12
Duty of Loyalty	12
Duty of Compliance	12
Duty to Manage Accounts	12
V. COMPLIANCE WITH OUR OWN POLICIES AND STANDARDS	12
VI. WORKFORCE MEMBERS OBLIGATION	12
VII. MAKING THE RIGHT DECISION.....	13
VIII. RELATIONSHIPS WITH OUR MEMBERS	13
NON-DISCRIMINATION	13
DECISION IN BEST INTEREST OF BENEFICIARIES AND ENROLLEES	13
UPCODING.....	13
QUALITY OF SERVICE.....	13
IX. ANTI-FRAUD	14
ANTI-COMPETITIVE PRACTICES	14
ANTI-KICKBACK STATUTE	14

STARK LAW	15
FALSE CLAIMS ACT	15
FEDERAL PROGRAM FRAUD CIVIL REMEDIES ACT	15
EXCLUDED PROVIDERS	15
X. CONDUCTING COMPANY BUSINESS	15
FAIR DEALING	15
Providing Business Courtesies to Customers or Sources of Customers.....	16
Charitable Contributions	16
Government Customers	16
Acceptance of Gifts, Gratuities and Other Business Courtesies	16
Insider Trading	16
ACCURATE BOOKS AND ACCOUNTS	17
GOVERNMENT RELATIONS	17
PERSONAL USE OF ORGANIZATION’S RESOURCES	17
XI. AVOIDING ABUSES OF TRUST	17
CONFLICT OF INTEREST	18
XII. SAFEGUARDING INFORMATION.....	18
CONFIDENTIAL INFORMATION.....	18
PREMIER’S RESTRICTED INFORMATION	18
USE OF ELECTRONIC SYSTEMS	18
HITECH.....	19
XIII. WORKPLACE AND EMPLOYMENT ISSUES.....	19
HARASSMENT AND DISCRIMINATION	19
WORKPLACE DIVERSITY AND EQUAL EMPLOYMENT OPPORTUNITY.....	20
HEALTH AND SAFETY	20
LICENSE AND CERTIFICATION RENEWALS.....	20
REFRAINING FROM SUBSTANCE ABUSE	20

XIV. COMPLIANCE PROGRAM IMPLEMENTATION AND OVERSIGHT	21
MECHANISMS FOR IDENTIFYING AND ADDRESSING COMPLIANCE CONCERNS	21
MONITORING AND AUDITING	21
CONTRACTOR OVERSIGHT	21
FRAUD, WASTE AND ABUSE.....	21
TRAINING	22
ENFORCEMENT AND CORRECTIVE ACTION	22
XV. GOVERNMENT INVESTIGATIONS.....	22
XVI. COMMUNICATION	23
COMMUNICATION WITH MEDIA	23
PERSONAL COMMUNICATIONS AND SOCIAL MEDIA.....	23
INTERNAL COMMUNICATIONS.....	23
ATTORNEY-CLIENT PRIVILEGE.....	23
XVII. LIMITATION ON EFFECT OF CODE OF CONDUCT	24
XVIII. AMENDMENTS TO THE CODE OF CONDUCT.....	24
XIX. REPORTING ISSUES AND CONCERNS	24
APPENDIX A – QUESTIONS AND ANSWERS	25
APPENDIX B –STATEMENT OF UNDERSTANDING	27
CONFIDENTIAL INFORMATION.....	27
USE OF ELECTRONIC SYSTEMS	27
APPENDIX C – ANTI-TRUST COMPLIANCE	28
PROHIBITED COMMUNICATIONS.....	28
UNSOLICITED COMMUNICATIONS FROM COMPETITORS	28
MARKET SURVEYS.....	29

INAPPROPRIATE TRADE ASSOCIATION ACTIVITIES.....	29
SANCTIONS FOR NON-COMPLIANCE.....	30
APPENDIX D – FEDERAL FALSE CLAIMS LAWS	31
INTRODUCTION.....	31
FEDERAL FALSE CLAIMS ACT	31
NO RETALIATION	32
WORKPLACE PRACTICES.....	33

**PREMIER HEALTH INSURING CORPORATION /
PREMIER HEALTH PLAN
CODE OF CONDUCT SUMMARY**

Our Values in Action	We value respect, integrity, compassion, and excellence in the work place and putting these values into action depends on every member of our organization
Obligations of our Board of Directors members	Premier Insuring Corporation / Premier Health Plan (“Premier”) Board of Director members have fiduciary obligations to ensure that the mission of Premier is honored and that corporate resources are used wisely in support of that purpose. Board members are guardians of the trust serving on behalf of the community, regardless of personal interests.
Compliance with Laws, Rules, Regulations, and our own Policies	<p>We are committed to full compliance with all federal, state, and local laws and regulations. We will immediately and directly report any actual or probable violations of law to an appropriate law enforcement agency in accordance with our reporting policy.</p> <p>We will also comply with our own policies, standards, and procedures.</p>
Relationships with Medicare Beneficiaries, Qualified Health Plan Enrollees, Providers or other individuals Stakeholders	<p>We are expected to know and understand the rights of the Medicare beneficiaries (Beneficiaries) and Qualified Health Plan Enrollee (Enrollees) we serve in a manner that recognizes and preserves the individual’s right to treatment with dignity and respect.</p> <p>We are committed to providing services that meet established quality standards and our contractual obligations.</p> <p>When we disclose information to the public it must be current, accurate and complete.</p> <p>We will refrain from engaging in illegal practices that might restrict competition.</p> <p>We will not offer or pay anything of value to inappropriately induce someone to refer a Medicare Beneficiary or potential Beneficiary to Premier.</p> <p>We will work in a manner consistent with regulatory and contractual requirements with our providers or other individuals or entities performing functions or services related to benefit administration activities.</p>

Using the
Organization's
Resources

We will not contribute or donate Premier funds, products, services, use of facilities or other resources to any political cause without prior approval.

Charitable contributions received from others must directly benefit Premier. We will not accept contributions in exchange for a commitment to purchase supplies or services.

We will not seek to gain an improper business advantage by offering courtesies such as entertainment, meals, transportation or lodging to our business associates.

We will not use premier resources for personal reasons.

Avoiding
Abuses of
Trust

We will not accept cash or anything of substantial value from Beneficiaries, Enrollees, Beneficiaries' or Enrollees' family members or business associates of Premier.

We will avoid outside employment, financial interests, investments or other outside activities that impair our productivity or decision-making while at our Premier job.

We will not trade in the securities of any company on the basis of non-public information acquired through our relationship with Premier.

We will strictly safeguard all confidential information with which we are entrusted. We will not use, discuss or disclose such information except to serve our Beneficiaries and Enrollees, carry out our job duties, or as required or allowed by law. This responsibility extends beyond the period of employment.

Safeguarding
Information

We will safeguard computer access codes from unauthorized use or disclosure. We will protect electronic information by using computers responsibly and in accordance with our appropriate use policies, standards and procedures.

We will not use, copy, or distribute copyrighted information and other intellectual property in violation of applicable law or contractual obligations.

We will report any incidences of bullying, discrimination, abuse or sexual harassment involving Beneficiaries, Enrollees, visitors or Team Members.

We are committed to providing job opportunities to Team Members and applicants without discrimination.

Workplace
Conduct and
Employment
Issues

We will comply with workplace safety regulations and standards and participate in safety education and training.

Team Members who are required to do so will maintain and hold their license or certification in a current and active status.

We will maintain a drug, tobacco and alcohol-free workplace, and strictly control the distribution and use of prescription drugs and controlled substances.

To oversee our Compliance Program, Premier has a Compliance Officer.

Every Team Member has a duty to report issues or concerns they believe may be a violation of this Code of Conduct, federal, state, or local laws or internal policies, standards and procedures. No adverse action or retribution will be taken against a Team Member because he/she reports a concern or suspected violation in good faith. A report can be made to any member of the leadership team, the affiliate's compliance personnel, any member of the Compliance Committee, any member of the Compliance Division, the Compliance Officer, or anonymously using the Premier Health Insuring Corporation / Premier Health Plan's Compliance Hotline:

1-844-348-7822

Program
Implementation

New Team Members will attend Compliance and Fraud, Waste and Abuse training as part of their orientation. Annually, Team Members will receive additional education on a variety of topics, including the Code of Conduct.

New Team members will sign or electronically submit a Statement of Understanding of the Code of Conduct upon initial employment and annually thereafter.

Internal audits and investigations relating to compliance and Fraud, Waste and Abuse will be conducted in many areas, including, but not limited to, computer usage, billing and financial reporting.

Strict adherence to the Code of Conduct is vital. Violations may result in corrective action ranging from a warning and reprimand, to discharge from employment.

I. INTRODUCTION

It is the policy of Premier that all Team Members which include every board member, employee, or other individuals or entities performing functions or services related to managed care activities on behalf of Premier will comply with federal, state and local laws and regulations, and will conduct themselves in accordance with the highest ethical standards. To help achieve that end, we, at Premier have created a Code of Conduct (the “Code”) that describes our policies, standards and procedures concerning certain laws that affect many of our business operations.

The Code will be updated periodically to ensure that the organization is educating its Team Members about changes in specific laws and regulations, and that Premier is implementing and enforcing those changes. Some of the principles listed on the following pages are general statements to which a previously adopted Premier policy applies. The more detailed policy will provide necessary guidance. If you have questions regarding the Code, discuss them with your supervisor or call the Premier Compliance Division or the Premier Compliance Hotline discussed later in this book. The Code is intended as a guide for each Team Member’s conduct, so that Premier and its affiliated entities may fulfill their obligations to comply with the laws and public policies that continually affect their business.

However, no set of standards or written rules can substitute for the personal integrity, good judgment and the common sense required to meeting the challenges of the healthcare profession. Enclosed is your personal copy of the Premier Health Insuring Corporation / Premier Health Plan Code of Conduct.

I. OUR MISSION

We will **BUILD HEALTHIER COMMUNITIES** with others who share our commitment to provide high-quality, cost-competitive healthcare plans.

II. OUR VALUES

We **RESPECT** each person’s dignity, act with **INTEGRITY** to do the right thing in all aspects of our responsibilities, serve with **COMPASSION** that embraces each individual’s concerns and hopes, and commit to **EXCELLENCE** as measured to the highest level of performance.

III. COMPLIANCE WITH LAWS AND REGULATIONS

We are committed to compliance with all federal, state and local laws and regulations.

IV. FIDUCIARY OBLIGATIONS OF OUR BOARD OF DIRECTORS

Board members have fiduciary obligations to ensure that the mission of Premier is honored and that corporate resources are used wisely in support of that purpose. Board members are guardians of the trust, serving on behalf of the community, regardless of personal interests.

Duty of Care

Board members have a responsibility to be active in Premier's affairs. Board members who know the facts, analyze the probable results of their actions, exercise sound judgment, and keep reasonable records fulfill their duty of care.

Duty of Loyalty

The duty of loyalty requires that the interests of Premier and its objectives take precedence over Board members' personal or business interests or those of their family and friends. Board members must always act fairly and in the best interest of Premier without concern for their own interests. Board members have an obligation to disclose conflicts of interest.

Duty of Compliance

Board members have a duty to be faithful to Premier's purpose and mission. Board members must also adhere to Premier's governing documents and to laws and regulations that relate to Premier and its operations.

Duty to Manage Accounts

Board members are responsible for Premier's financial stability and accountability.

V. COMPLIANCE WITH OUR OWN POLICIES AND STANDARDS

We are committed to full compliance with our own policies, standards and procedures. Team Members will be made aware of these policies and procedures during general orientation, and, if applicable, orientation within the department where they work.

VI. WORKFORCE MEMBERS OBLIGATION

Workforce Members of Premier have a responsibility to the Corporate Division that is threefold:

1. To adhere to the Code in your individual decisions and actions.
2. To seek clarification on questions about the legality or ethics of any decision you are about to make, or instructions you are about to follow.
3. To report any actual or potential violation of the Code, law, regulations or policy.

VII. MAKING THE RIGHT DECISION

When confronted with an ethical issue or situation, always ask yourself the following questions before taking action:

- Is it legal?
- Is it in accordance with the Premier's Code?
- Does it align with Premier's Mission and Values?
- Do you feel good about your decision?
- Would you want others to know of your decision/action?

If you answered yes to all of the above questions, then it is likely that you have made the right decision. However, if you have any doubts, discuss the situation with your supervisor or call the Premier Health Insuring Corporation / Premier Health Plan's Compliance Hotline: **1-844-348-7822**

VIII. RELATIONSHIPS WITH OUR MEMBERS

NON-DISCRIMINATION

Premier complies with applicable laws and does not discriminate. Specifically, Premier or our Team Members may not in any way discriminate against our Beneficiaries, Enrollees or potential Beneficiaries or Enrollees on the basis of race, color, national origin, age, disability, or sex (unless prescribed by regulatory or government mandate e.g., end-stage renal disease). Premier does not exclude people or treat them differently because of any above-mentioned criteria.

DECISION IN BEST INTEREST OF BENEFICIARIES AND ENROLLEES

Premier or its Team Members cannot take any action to limit the ability of a provider to make decisions in the best interests of the Beneficiaries or Enrollees.

UPCODING

Premier, its contractors cannot engage in upcoding or bill for services that were not actually provided, not medically necessary, performed by an improperly supervised or unqualified employee, or performed by an excluded individual.

QUALITY OF SERVICE

We are committed to providing services that meet all of our contractual obligations including, but not limited to CMS, National Committee for Quality Assurance (NCQA), and other established standards for quality. These include those established by our own policies, standards, and procedures. Team Members who have a safety or quality concern should report the concern to their direct supervisor. No disciplinary action will be taken against any Team Member for reporting a quality or safety concern.

IX. ANTI-FRAUD

ANTI-COMPETITIVE PRACTICES

Antitrust laws are designed to ensure competition and to preserve the free enterprise system. Antitrust laws may also be implicated by any communications with competitors, whether orally or in writing, that relate to competitively sensitive matters, or even inappropriate trade association activities. Practices that may implicate antitrust laws include agreements or understandings among competitors to: (1) fix, stabilize or control prices or salaries; (2) divide or allocate customers, products, services, markets or territories; (3) collectively refuse to deal (group boycott) certain customers or suppliers; or (4) agree not to engage in the manufacture or sale of or to limit production or sale of any product or line. Team Members should not engage in any discussion, agreement, or understanding with any competitor with respect to any of the above-mentioned items. In a health plan setting, certain types of activities or transactions may raise special issues under anti-trust laws such:

- Any exclusive provisions and contracts with suppliers, distributors, or providers;
- Selective contracting with providers;
- Any joint venture or joint bidding arrangement;
- Any sharing of confidential information with competitors; or
- Offers to provide research and data results at no cost to the health plan.

This is a highly complex area, and this document cannot cover all situations in which antitrust laws may apply. Team Members should take special care in this area, and promptly refer any questions to the Insurance Counsel. For further information concerning these laws, see Appendix C – Anti-Trust Compliance.

ANTI-KICKBACK STATUTE

Federal laws prohibit offering anything of value to an entity or person to induce that person to align with or refer a member to Premier. The laws also prohibit anyone from accepting anything of value for such purpose. As this is a highly complex area, this document cannot list all situations in which the anti-kickback laws may apply. Therefore, we must take special care in this area, and promptly refer any questions to the Compliance Officer or Insurance Counsel.

Examples of the types of actions that could violate the federal Medicare anti-kickback statute and similar state laws include the following:

- Offering or paying anything of value to induce someone to refer a member to Premier, including, but not limited to, the routine waiving of co-payments for Medicare or Beneficiaries.
- Soliciting or receiving anything of value for the referral of Premier Medicare Beneficiaries to others.
- Giving or receiving free goods or discounts, except as permitted under applicable laws, regulations and Premier policies.

STARK LAW

Premier or any of our Team Members shall not engage in any activity in violation of the Stark Law, such as submitting to the federal health care programs any claims of members or Medicare Beneficiaries who were referred pursuant to contracts and/or financial arrangements that were designed to induce referrals in violation of the Stark Law or other similar federal or state statute or regulations.

FALSE CLAIMS ACT

Premier or any of our Team Members shall not knowingly present or cause to be submitted a false claim, record or statement for payment, record or statement for payment to the government; knowingly use a false record or statement to obtain payment on a false claim paid by the government, or engage in a conspiracy to defraud the government by the improper submission of a false claim for payment.

All Team Members must exercise due care in any written or oral statement made to any government agency or other payor.

FEDERAL PROGRAM FRAUD CIVIL REMEDIES ACT

Premier or our Team Members shall not engage in any activity in violation of Federal Program Fraud Civil Remedies Act, such as deliberately submitting false statements or claims to federal agencies or submitting such claims in deliberate ignorance or reckless disregard of their truth or falsity.

EXCLUDED PROVIDERS

Premier, our Board members, employees or other individuals or entities performing functions or services related to managed care activities on behalf of Premier shall not make health care program payment for any item or service furnished, ordered, or prescribed by an individual or entity excluded by the OIG, or The United States General Services Administration (GSA).

X. CONDUCTING COMPANY BUSINESS

FAIR DEALING

You are expected to conduct yourself ethically, honestly, and with integrity in all dealings. This means principles of fairness, good faith, and respect must govern your conduct with others both inside and outside the Premier. Your actions must be consistent with laws, regulations, and Premier policies. No unlawful practice can be justified on the basis of customary practice, convenience, efficiency, or because you believe that the “end justifies the means.”

The manner in which we deal with our clients and business partners establishes trust, and therefore impacts our reputation, and the success of our business. We are committed to doing business fairly and ethically. You have a responsibility to deal fairly and honestly with our clients, vendors, business partners, as well as, your coworkers. You are prohibited from taking unfair advantage of coworkers, clients (potential, current, or former), or business partners through manipulation, falsification,

distortion, concealment, deceit, abuse of privileged information, misrepresentation, or omission of material facts, or any other unfair business practice. Our reputation and success of our business also depends on the fair dealing with respect to the sales and marketing activities. You must accurately present, verbally and in writing, products, services, benefits and pricing when engaging in sales and marketing efforts on behalf of Premier.

Providing Business Courtesies to Customers or Sources of Customers

Our success in the marketplace results from providing quality services at competitive prices. We do not seek to gain an *improper advantage* by offering business courtesies such as entertainment, meals, transportation or lodging to customers, referral sources or purchasers of Premier services. We should never offer any type of business courtesy to a referral source or a purchaser for the purpose of obtaining favorable treatment or advantage.

Charitable Contributions

All charitable contributions received from vendors must directly benefit Premier. Under no circumstances may a check be made payable to an individual at Premier. We shall not accept any donations that are in conjunction with a marketing effort or sales promotion. Under no circumstances shall donations be accepted that require Premier to use the donation to purchase supplies from the vendor making the contribution.

Government Customers

Premier is a party to government contracts. It is essential that all Team Members are knowledgeable of, and comply with, all of the applicable laws, rules and regulations of governmental agencies with which we do business.

Acceptance of Gifts, Gratuities and Other Business Courtesies

Premier provides guidance to all Team Members regarding offerings made by vendors and referral sources. Team Members may not accept meals or any other promotional items offered by vendors or referral sources, unless approved in accordance with policy. This policy ensures compliance with the federal Anti-Kickback Statute. This policy also enables Premier to enter into both business and referral arrangements based on the quality of the services provided. This policy applies to potential vendors and referral sources, as well as those vendors and referral sources with whom Premier currently works.

Insider Trading

No Team Member may trade in the securities of any company, or buy or sell any property or assets, on the basis of non-public information acquired through employment in Premier, whether such information comes from Premier or from another company with which Premier has a confidential relationship and / or affiliation.

ACCURATE BOOKS AND ACCOUNTS

All of Premier's financial transactions must be properly authorized by management, and accurately and completely recorded on Premier's books and records. Financial records and reports will be prepared and maintained in accordance with generally accepted accounting principles under an established system of internal controls. We will not make false, incomplete or unsupported corporate entries in our books. No undisclosed or unrecorded corporate funds will be established for any purpose, nor will Premier's funds be placed in any personal or non- corporate account. Finally, all corporate assets must be properly protected. Periodically, property records will be compared with the actual property, and action taken to reconcile any variances. We will not fraudulently influence, coerce, manipulate, or mislead any internal auditor or independent public or certified accountant engaged in the performance of an audit of the financial statements.

GOVERNMENT RELATIONS

All requests for information from any regulatory agency should be complied within an accurate and timely manner, and in conformance with applicable laws and regulations governing such requests for reports or information. All notifications from a governmental regulatory agency or its representative regarding a violation or citation alleging a violation should be referred to the appropriate manager, director, and/or vice president for immediate attention. Employees should contact Insurance Counsel immediately upon receipt of any non-routine request (subpoena, affidavit, warrant, etc.) from any government agency or its representative.

Insurance Counsel will provide direction for responding to investigations and requests for information from the government, so that activities are not obstructed and employees understand their role.

PERSONAL USE OF ORGANIZATION'S RESOURCES

It is everyone's responsibility to safeguard the organization's resources, including time, materials, equipment, and information. It is not permissible to use the organization's resources for personal reasons without authorization from a supervisor. Occasional use of some items like telephones, computers, and multifunctional devices is permissible. Likewise, your supervisor must approve any community or charitable use of the organization's resources in advance. Under no circumstances should non-business use of the organization's resources interfere with your job duties or the job duties of others.

XI. AVOIDING ABUSES OF TRUST

Team Members must avoid any activity that might interfere or appear to interfere with decision-making in situations where the Team Member's personal interests conflict with Premier's interests or the interests of Premier's customers or suppliers.

CONFLICT OF INTEREST

Premier recognizes that the potential for conflict of interest exists for Team Members at all levels within Premier. Team Members are required to read Premier's Conflict of Interest Policy. It is the policy of Premier to request the disclosure of potential conflicts of interests on an annual basis so that appropriate action may be taken to ensure that said conflicts do not inappropriately influence important decisions. Such disclosure is required of Board members, administration, sourcing personnel, and authorized signers.

XII. SAFEGUARDING INFORMATION

CONFIDENTIAL INFORMATION

Pursuant to the privacy laws, Team Members must strictly safeguard all confidential information with which they are entrusted. We may never discuss such information outside the normal and necessary course of Premier's business. In particular, all Team Members must protect the privacy of our members, and the confidentiality of all information related to their care, and any past, current or future medical condition and / or as otherwise outlined in claims data and / or data sharing requirements and reporting. Personal information about our members, fellow Team Members, and others with whom we do business should not be discussed except with those with a genuine need to know. For more information about the privacy laws contact the Premier's Compliance Division.

PREMIER'S RESTRICTED INFORMATION

It is Premier's policy to control the dissemination of Premier's proprietary information. Except as specifically authorized by management pursuant to established procedures, do not disclose to any outside party any non-public business, financial, personnel, commercial or technological information, or plans or data acquired during employment at Premier. During the term of employment at Premier, a Team Member should disseminate this type of information only to individuals having a "need to know" and should protect the information from access by unauthorized personnel. Upon termination of employment, an individual may not copy, take or retain any documents containing Premier's restricted information. The prohibition against disclosing Premier's restricted information extends beyond the period of employment as long as the information is not in the public domain. An individual's agreement to continue to protect the confidentiality of such information after the term of employment ends is considered an important part of that person's obligations to Premier.

USE OF ELECTRONIC SYSTEMS

The ability to utilize information effectively while protecting it from unauthorized or inappropriate use is essential. All information must be accessed, used, transmitted, reproduced and stored in a manner that provides the maximum amount of protection from inappropriate disclosure. Many Team Members will be provided with access to one or more of Premier's computer systems and databases. Identification codes and passwords provided to access computer systems must never be disclosed to another. Team Members must not attempt to learn another's access code, nor attempt to access a

computer system with an access code other than their own. Compromised access codes must be reported to your supervisor immediately. Team Members must not use any computer outside the scope of their job responsibilities. Questions regarding Information Security should be directed to the Premier Information Security Officer.

The Internet, electronic mail, voicemail and facsimile machines are also used throughout Premier. These electronic messaging systems are for business purposes only. Since complete privacy cannot be guaranteed when using an electronic messaging system, sensitive information must not be transmitted nor stored on these systems. Specific policies have been developed for the use of computers, the Internet and electronic messaging systems.

HITECH

The Health Information Technology for Economic and Clinical Health Act (HITECH) provisions of ARRA include important changes in Privacy:

- Established a Federal breach notification requirement for health information that is NOT encrypted or otherwise made indecipherable.
- It requires that an individual be notified in writing if there is an unauthorized disclosure or use of their health information.
- Ensures that new entities that were not contemplated when the Federal privacy rules were written, as well as those entities that do work on behalf of providers, insurers and business associates (BA) are subject to the same privacy and security rules as providers and health insurers.
- Provides transparency to patients by allowing them to request an audit trail showing all disclosures of their health information made through an electronic record.
- Eliminates the market that has emerged around the sale and mining of PHI without the patient's authorization.
- Strengthens enforcement of Federal privacy and security laws by increasing penalties for violations and providing greater resources for enforcement and oversight activities.

XIII. WORKPLACE AND EMPLOYMENT ISSUES

HARASSMENT AND DISCRIMINATION

Premier supports a work environment free of discriminatory practices or sexual harassment involving Beneficiaries, Enrollees, visitors or co-workers. It is the policy of Premier that Team Members and their work environment shall be free from all forms of harassment. These behaviors include inappropriate jokes, slurs, and intimidation.

Sexual harassment in any form is not tolerated, including unwelcome sexual advances, request for sexual favors, and other verbal or physical conduct of a sexual nature. Any Team Member, who believes a Team Member, manager or supervisor is subjecting him/her to sexual harassment, or their employment is being adversely affected by such conduct, should report such incidents to their

supervisor, department manager, Human Resources or the Compliance Hotline. Team Members may contact the Human Resources department within their affiliate for specific reporting procedures.

WORKPLACE DIVERSITY AND EQUAL EMPLOYMENT OPPORTUNITY

Premier is enriched by the diversity of people from all segments of our community. This diversity is reflected within the Premier workforce. Treating Team Members fairly with respect and dignity is woven into the Premier culture. All persons are entitled to equal employment opportunities, and Premier is committed to providing job opportunities to applicants and Team Members without regard to race, color, religion, sex, age, marital status, national origin, disability, or any other legally protected status. Our policy of nondiscrimination prevails throughout every aspect of the employment process, including recruitment, selection, placement, training, compensation, promotion, transfer, and termination.

HEALTH AND SAFETY

Premier will provide an environment that is safe for Beneficiaries, Enrollees, visitors, Team Members, and volunteers. To meet this objective, all affiliates within Premier will comply with all governmental regulations and safety standards as prescribed by State and Federal regulatory agencies internal policies. Safety education and training is provided for all Team Members and is an ongoing process. The affiliate's safety official or safety committee will provide guidance on safety issues, as well as promotion of and administration of the safety policies to ensure a safe environment. Policies and procedures are in place to provide mechanisms for reporting incidents or addressing safety issues in a timely manner.

LICENSE AND CERTIFICATION RENEWALS

To maintain quality standards of care, and to comply with appropriate federal, state or local laws, Premier requires Team Members in certain categories to provide a current license or certification. Premier validates each license or certificate upon initial employment and on a periodic basis thereafter. Independent contractors and other businesses that are required to be licensed, certified, or hold certain other credentials are responsible for keeping such credentials current. Premier will not allow any Team Member, business or independent contractor to work in Premier without valid credentials as required by law where necessary and appropriate, this includes individuals that have been excluded or sanctioned from participating in government programs.

REFRAINING FROM SUBSTANCE ABUSE

It is the policy of Premier to provide Team Members and customers with a working environment that is free of the issues associated with the use and abuse of controlled substances, tobacco and alcohol. The consumption, possession, sale or purchase of alcohol on Premier property during business hours is prohibited with the exception of events in conference, meeting or recreational facilities and approved in advance by management. Premier also prohibits Team Members from arriving at work under the influence of alcohol or a controlled substance. If a Team Member is found to be in violation of this policy, management will determine the appropriate disciplinary action, which may include termination.

XIV. COMPLIANCE PROGRAM IMPLEMENTATION AND OVERSIGHT

MECHANISMS FOR IDENTIFYING AND ADDRESSING COMPLIANCE CONCERNS

As outlined below, Premier is committed to establishing mechanisms for identifying and addressing compliance concerns. The Compliance Division is responsible for appropriate implementation and oversight of the Premier Compliance Program. The Compliance Division's findings may result in corrective action, disciplinary action, changes in our operations, or modification or termination of the vendors, contractors, or First Tier, Downstream or Related Entity contracts. In addition, performance improvement activities occur throughout Premier, and individual departments are required to monitor their performance.

MONITORING AND AUDITING

Premier is committed to monitoring its activities on a continual basis. The Compliance Division conducts oversight, auditing, and monitoring and investigations in a variety of areas relating to regulatory compliance. Findings may result in corrective action, disciplinary action or changes in our operations. In addition, performance improvement activities occur throughout Premier and individual departments are required to monitor performance.

CONTRACTOR OVERSIGHT

Premier delegates the responsibility to carry out a number of its contractual obligations in relation to benefit administration. Premier retains accountability for services provided by its contractors including, first tier, downstream, and related entities. Premier retains responsibility in relation to compliance with applicable state, federal and contractual requirements. To ensure that these terms and conditions of regulatory guidance, contracts and requirements are adhered to, Premier conducts a number of oversight activities. These oversight activities are outlined in Premier policies and procedures, and oversight activities such as auditing and monitoring. These activities will be overseen and / or performed by the Premier Board of Directors, Compliance Committee, Compliance Department and Compliance Officer, and operational personnel. The findings may result in corrective action up to and including termination of contract.

FRAUD, WASTE AND ABUSE

Premier has implemented a Fraud, Waste, and Abuse (FWA) program. Routine reviews of information and results of investigations will be conducted in order to identify outliers in billing and utilization and identify the population of providers and pharmacies that will be audited. Referrals for potential fraudulent cases will not only come from claims data but can also originate from many sources internally and externally. Members, providers, employees, law enforcement and regulatory agencies, and other organizations are able to contact the plan via phone and e-mail if they suspect that a provider is engaged in inappropriate practices. Our Special Investigations Unit along with the Compliance Division conducts data mining activities on behalf of Premier in order to identify potential issues of FWA. If you are know are aware of any matters that should be reported that relate to FWA, this

information should be reported to the Compliance Officer.

TRAINING

Each new Team Member is required to attend Compliance and Fraud, Waste and Abuse training as part of their general orientation, and annually thereafter. Annually, Team Members may also be required to complete additional education on a variety of topics pertinent to their job, as well as general training on this Code of Conduct.

ENFORCEMENT AND CORRECTIVE ACTION

Strict adherence to this Code is vital. Supervisors are responsible for ensuring that Team Members are aware of and adhere to the provisions of the Code. Please consult your manager or the Compliance Division for clarification or guidance on any area covered in the Code.

Upon receipt of credible reports of suspected violations or irregularities, a member of the Compliance Division will initiate an investigation and recommend corrective action where appropriate. Violations of the Code may result in corrective action ranging from a warning and reprimand, to discharge, or where appropriate, disclosure to the appropriate government agency, retribution, or filing of a civil or criminal complaint. Operating management, according to our corrective action procedures, will make disciplinary decisions. Team Leaders may also receive corrective action for failing to adequately instruct Team Members, or for failing to detect non-compliance with applicable policies and legal requirements, where reasonable care would have led to discovery of the problem and an opportunity to correct it.

XV. GOVERNMENT INVESTIGATIONS

It is Premier's policy to fully comply with the law and cooperate with any reasonable demands made via a search warrant or subpoena. It is essential that the legal rights of Premier and its personnel be protected. If an employee receives an inquiry, subpoena or other legal document regarding Premier's official business from any government agency, the employee shall notify his or her supervisor and a representative of Legal Services immediately. If an employee is contacted at home by a government agency concerning Premier's official business, the employee should ask the agent to call during business hours at work, and immediately contact Insurance Counsel to discuss the situation as outlined in Premier's policies and procedures. Employees must never destroy or alter any document or record in anticipation of a request for the document or record by a government agency or court. The employee must never lie or make false or misleading statements to any government investigator, and never attempt to persuade any other employee or other person to provide false or misleading information to a government investigator, or fail to cooperate with a government investigation or audit.

XVI. COMMUNICATION

COMMUNICATION WITH MEDIA

To ensure the release of factual and accurate information and to generally assist with media communications, employees should contact or coordinate with appropriate leadership (i.e., Marketing, Compliance and / or Legal) and refer to applicable marketing policies regarding all media inquiries and requests. Employees and those agents speaking officially on behalf of Premier should avoid any of the following types of interactions without following applicable marketing policies:

- Responding to calls from the news media;
- Contacting and/or calling the media about a story or news item about Premier;
- Conducting interviews with media at public events, exhibits or conventions, or endorsing a product or company that is currently associated with Premier; or
- Endorsing written marketing materials, or free or paid advertisements on behalf of Premier.

PERSONAL COMMUNICATIONS AND SOCIAL MEDIA

Employees who publish or post content on blogs, social-networking sites, wikis, and other user-generated media on the internet (such as, Facebook, Twitter and LinkedIn, etc.) should exercise good judgment. You should not discuss Premier business, proprietary or confidential information, clients or clients' confidential information on any social media site or post.

If you list Premier as your employer, or state that you are an officer, board member, or director, you must avoid giving impression that you are speaking on behalf of Premier.

INTERNAL COMMUNICATIONS

You should exercise good judgment in the drafting communications, including email, text messaging, instant messaging, and documents shared on Premier's Intranets. Premier may be required to retain certain documents and communications to meet regulatory requirements, and may be required to produce such communications pursuant to legal or regulatory proceedings. Written communications can be used against you and Premier in legal or regulatory proceedings. You should never put anything in writing using Premier systems that you would be uncomfortable with others reading.

ATTORNEY-CLIENT PRIVILEGE

The attorney-client privilege protects confidential communications between an attorney and a client that is intended to be confidential and for the purpose of requesting or receiving legal advice. The attorney-client privilege does not apply to every communication with an attorney. Communications must be kept confidential for the privilege to be preserved. If the attorney-client communication is disclosed to persons outside the Premier—or even to persons within the Premier who are not directly involved in the matter—the privilege may be lost. You should not forward or otherwise distribute privileged communications without prior permission from Insurance Counsel. Questions on the use and

applicability of the privilege to your communications should be directed to Insurance Counsel.

XVII. LIMITATION ON EFFECT OF CODE OF CONDUCT

Nothing contained in this Code of Conduct is to be construed or interpreted to create a contract of employment, either express or implied, nor is anything contained in this Code of Conduct intended to alter a person's status of "employment-at-will" with respect to Premier.

XVIII. AMENDMENTS TO THE CODE OF CONDUCT

From time to time, Premier may amend the Code, in whole or in part. Changes will be communicated through management.

XIX. REPORTING ISSUES AND CONCERNS

Every Team Member has an affirmative duty to report issues or concerns they believe may be in violation of this Code, federal, state or local laws, or internal policies and standards. Several channels are available for reporting issues or concerns.

First, try to work through the issue with your direct report and / or supervisor.

Second, if the issue or concern cannot be addressed through the normal chain of command, then you can report your concerns in the following manner:

1. Contact the Premier Compliance Division at:

**Attention: Director of Compliance, Health Plan Operations
Premier Health ACO of Ohio
110 North Main, Suite 930
Dayton, OH 45402**

2. Call the Premier Health Insuring Corporation / Premier Health Plan Compliance Hotline at:

1 (844)-348-7822

The hotline is available 24 hours a day / 7 days a week. It is an anonymous method of contact. Remember, Premier strictly adheres to its non-retaliation policy and it is our job to report compliance concerns!!!

APPENDIX A – QUESTIONS AND ANSWERS

Q: What if I am confronted with a compliance problem and I don't know how to handle it?

A: Ask yourself the following questions:

- Does a specific act or policy appear to be in compliance with the relevant laws, regulations and the Premier integrity standards, policies and procedures?
- How would the issue appear to your family, friends and the general public?
- How would you feel explaining this matter to someone else to justify the action taken?
- Do you feel it would be advisable to seek further clarification from someone with expertise in the areas of compliance?

Q: Will my calls to the Compliance Hotline be recorded or traced?

A: No, after a call has been received, the call is transcribed and delivered to the Premier Compliance Division.

Q: Will I be informed of the results of the investigation that resulted from a hotline call?

A: Premier has an obligation to protect the rights of all employees. Therefore, actions taken by the Compliance Division and management as a result of a call will generally not be publicized or disclosed. The department takes every call seriously, and assures employees that they will be acted upon appropriately.

Q: What should I do if my supervisor is telling me to do something that I think is unlawful, or against the Code of Conduct?

A: First, talk to your supervisor and make sure you both understand the situation. If that does not clear up the matter, seek further assistance at your work level. If all these avenues fail, you are encouraged to call the Premier Health Insuring Corporation / Premier Health Plan Compliance Hotline. Do not risk your job, your future and/or the company's future by participating in something illegal or unethical.

Q: What is meant by kickbacks or incentives for Beneficiary referrals?

A: Anything of value flowing to or from someone who refers or is in a position to influence referrals may constitute a kickback. This is a very sensitive area of the law. If you have questions about this topic, speak to your supervisor, Insurance Counsel's Office or the Premier Compliance Division.

Q: I have friends who work for competitors, so when we are socializing sometimes the topic of conversation does include work. Are there topics that could present problems?

A: The Premier Code makes it clear that information derived as a result of Employment with Premier should be considered confidential. This is particularly the case when it comes to Beneficiary or proprietary information. You should consult your supervisor if you have any questions about this issue.

Q: What is meant by sexual harassment?

A: Sexual harassment can be described as aggressive sexual behavior that has been demonstrated to a person who has not suggested or encouraged the behavior. It can be sexual jokes, advances, demands or suggestions. If you have been the subject of this type of behavior, please notify your supervisor, manager, or human resources representative; or call the Premier Health Insuring Corporation / Premier Health Plan Compliance Hotline. This behavior is not tolerated at Premier. Allegations will be investigated confidentially and offenders will be placed in the appropriate level of corrective action.

Q: A vendor has offered to pay my travel and lodging expenses to attend a training and educational seminar for their products(s) at their home office. Is this okay?

A: Employees should not accept a vendor's offer to pay for the seminar, as it is against policies at Premier. It could be construed as a gift or inducement. If your supervisor or manager feels that the seminar is worthwhile and affordable, the organization may pay for you to attend.

APPENDIX B –STATEMENT OF UNDERSTANDING

1. I have read and understand the Premier Health Insuring Corporation / Premier Health Plan Code of Conduct and agree to abide by it to the best of my ability during my relationship with Premier.
2. I know that I have a duty to report any suspected violation of the Code of Conduct to management or a member of the Compliance Division at Premier.
3. I have not been convicted of, or charged with, a criminal offense related to healthcare.
4. I understand that a violation of the Code of Conduct may be grounds for disciplinary action, up to and including discharge.
5. At this time, I am not aware of any possible violation of the Code of Conduct.

CONFIDENTIAL INFORMATION

Team Members must safeguard all confidential information and may never discuss such information except to serve our members and Medicare Beneficiaries, Qualified Health Plan Enrollees, or conduct Premier business. In particular, Team Members must protect the privacy of our members and Beneficiaries, Qualified Health Plan Enrollees, and the confidentiality of all information related to their care or any past, current or future medical condition. Personal or proprietary information about our members and Medicare Beneficiaries, Qualified Health Plan Enrollees, fellow Team Members, and others with whom we do business should not be used or disclosed except with the consent of the person or as allowed by law.

USE OF ELECTRONIC SYSTEMS

Team Members may be provided with access to the organization’s computer systems. Computer access codes such as user IDs and passwords are like a signature. Access codes and / or passwords must never be disclosed to another. Team Members must not attempt to learn another’s access code or password, nor attempt to access a computer system with an access code or password other than their own. Compromised access codes must be reported to a supervisor immediately. Team Members must not use any computer outside their job responsibilities. For example, using the computer to retrieve medical information for a personal reason is not permitted.

The Internet, electronic mail, voice mail and facsimile machines are used throughout Premier. These “electronic messaging” systems are for Premier business purposes only. Sensitive information must not be stored or transmitted on these systems, unless approved safeguards are in place. Consult your department’s policies for more information on the use of computers, the Internet and electronic messaging systems.

**TEAM MEMBERS WILL ACKNOWLEDGE THEIR
UNDERSTANDING VIA HEALTHSTREAM**

APPENDIX C – ANTI-TRUST COMPLIANCE

The antitrust laws are intended to ensure competition and preserve the free enterprise system. This is a highly complex area, and this document cannot cover all situations where the antitrust laws might apply. For example, antitrust issues might arise in the context of communications with competitors; customer or supplier relations; mergers or joint ventures; or trade association activities. Team Members should take special care in this area, and promptly refer any questions or concerns directly to Insurance Counsel.

PROHIBITED COMMUNICATIONS

With the limited exception noted in the section below on joint ventures and other legitimate business collaborations, Premier Team Members should not engage in any communications, whether orally or in writing, with any competitor that relates to a competitively sensitive matter, including but not limited to any discussion or communication of, or any exchange of information on:

- Managed care pricing or provider or supplier contracting strategies
- Marketing or promotional initiatives
- Strategic business plans concerning the development, expansion, contraction, or reconfiguration of any facilities, clinical programs, or services
- Employee compensation and benefits

UNSOLICITED COMMUNICATIONS FROM COMPETITORS

If a Premier Team Member receives any nonpublic information from a competitor about its business intentions, strategies, or practices, the Team Member should notify the Insurance Counsel immediately. The Team Member should have no further written or oral communication with the competitor other than to advise them that the matter has been referred to the Insurance Counsel for appropriate review in accordance with Premier's Code.

If Insurance Counsel, or an attorney designated by the Insurance Counsel, thereafter determines that the communication was problematic, he or she will take appropriate action, including but not limited to providing written notice to the competitor of the impropriety of such communication and disavowing any interest on the part of Premier in engaging in any further communications of that nature. The Insurance Counsel will maintain a log identifying the source and specific nature of the non-public information received, the circumstances of its communication, and the action taken by the Insurance Counsel.

MARKET SURVEYS

Premier Team Members should not seek to obtain confidential cost, pricing or other competitively sensitive information directly from competitors in order to conduct a market survey or analysis. Such information about competitors shall be obtained only through or from publicly available sources. Questions relating to the appropriate methods of or appropriate sources for obtaining information about competitors shall be directed to Insurance Counsel.

INAPPROPRIATE TRADE ASSOCIATION ACTIVITIES

Trade associations present opportunities for competitors to come together and pursue many legitimate and worthwhile goals. Premier recognizes, however, that trade association activities can also give rise to the risk of anticompetitive collusion if nonpublic, competitively sensitive information is shared among or between competitors who are participating in such activities. Accordingly, any Premier Team Member attending a trade association meeting, conference or show should follow the guidelines below at all times.

- At a trade association meeting, do not discuss with or give your competitors any information concerning prices, salaries or benefits, territories, capacity, trade secrets, sales, bidding or contracting strategies, costs, customers, business plans or other marketing practices. If the association intends to conduct a survey of its member's prices, costs, salaries or business practices, the Team Member should confer with the Insurance Counsel before providing any information to the association pursuant to such a survey.
- Be cautious if you attend any informal or ad hoc sessions or meet or speak with competitors before, during or after the official trade association meeting. Such informal gatherings are of concern because, at a minimum, they create the appearance of impropriety and, at worst discussions may slip into competitively sensitive areas that are properly off-limits during the official meeting or at any other time.
- Do not participate in, or acquiesce to, any solicitation to engage in a "boycott" or to take other collective action against a private or governmental payer, hospital, or other provider. Trade associations are not labor unions; unlike labor unions, trade associations cannot lawfully bargain or refuse to deal with payers on behalf of their members.
- Be wary of any meetings that are not open to all members of the association. If you find yourself in this type of meeting, leave immediately and contact Premier's Insurance Counsel as soon as possible.
- If there is any reason to believe the trade association is engaging in questionable or illegal behavior, the Team Member should object and make sure that his/her objection is duly recorded and leave the meeting. Next, the Team Member should promptly contact the Insurance Counsel and notify him/her of any concerns and, if the Insurance Counsel so advises, the Team Member should resign from the association.
- If, in the course of a trade association meeting, a Team Member is asked by an official or member of the trade association to engage in any conduct that is questionable from an antitrust

standpoint, he/she should consult with the Insurance Counsel before agreeing to engage in any such conduct.

- Team Members have a personal responsibility to understand and adhere to these guidelines. Each Team Member attending a trade association meeting must review these guidelines prior to attending any trade association meetings and should direct any questions about these guidelines to the Insurance Counsel.

SANCTIONS FOR NON-COMPLIANCE

It is the responsibility of each Team Member to ensure that all of the activities of Premier are conducted in compliance with the antitrust laws. Whenever a Team Member becomes aware of potentially anticompetitive conduct, he or she should promptly contact Insurance Counsel so that timely advice may be provided and effective action may be taken to ensure compliance with the antitrust laws. Any Team Member who engages in conduct that violates the antitrust laws, or who knowingly fails to report such conduct in which another Team Member has been or is engaged, will be subject to corrective action, including but not limited to the possibility of suspension or termination of employment.

APPENDIX D – FEDERAL FALSE CLAIMS LAWS

INTRODUCTION

False claims statutes protect government funded programs from abusive or fraudulent practices by the Beneficiaries of such programs. The primary government health benefit program with which Premier does business is Medicare.

Medicare was established in 1965 by Title XVIII of the Social Security Act. It is a federally funded health insurance program for citizens age 65 and older and persons with a long term disability or end-stage renal disease. Medicare consists of four parts. Part A provides coverage for care provided in institutional settings, such as inpatient hospitals and skilled nursing facilities. Part B covers items and services provided by outpatient hospital departments, physicians, certain non-physician practitioners, ambulance companies, laboratories and durable medical equipment suppliers. Part C was established in 1997 as “Medicare Choice” to provide services through health maintenance organizations and preferred provider organizations. In addition to the services covered under Parts A and B, Part C can include wellness and preventative health programs. Part D became effective January 1, 2006 and provides coverage for prescription drugs through private Prescription Drug Plans.

The laws and regulations governing Medicare are complex. Nevertheless, Premier has an obligation to submit information to Medicare that is accurate, complete and in compliance with the applicable regulations and program instructions. Failure to do so can result in heavy fines and costly corrective action.

FEDERAL FALSE CLAIMS ACT

The federal False Claims Act makes a person liable for fines ranging from \$10,781 to \$21,916 per claim for knowingly presenting a false or fraudulent claim to a federal government agency or program. In addition, a guilty party may be required to pay three times the amount of damages (treble damages) that the government incurred. Self disclosure and cooperation reduces the government's damages (investigation and litigation cost); a court may reduce treble damages or lower penalty amounts if the violator promptly discloses the violation and fully cooperates with the government.

For purposes of the False Claim Act, “claim” includes any request or demand, whether under a contract or otherwise, for money or property which is made to a contractor, grantee, or other recipient if the United States Government provides any portion of the money or property which is requested or demanded, or if the Government will reimburse such contractor, grantee, or other recipient for any portion of the money or property which is requested or demanded. In healthcare, claim includes any of the paper or electronic billing forms submitted to a government healthcare program.

“Knowingly” means that a person, with respect to information on the claim:

- Has actual knowledge of the information
- Acts in deliberate ignorance of the truth or falsity of the information
- Acts in reckless disregard of the truth or falsity of the information; no proof of specific intent to defraud is required

Actions that give rise to liability under the federal False Claims Act include:

- Knowingly presenting or causing to be presented, to an officer or employee of the United States Government or a member of the Armed Forces of the United States a false or fraudulent claim for payment or approval
- Knowingly making, using, or causing to be made or used, a false record or statement to get a false or fraudulent claim paid or approved by the Government
- Conspiring to defraud the Government by getting a false or fraudulent claim allowed or paid
- Having possession, custody, or control of property or money used, or to be used, by the Government and, intending to defraud the Government or willfully concealing the property, delivering, or causing to be delivered, less property than the amount for which the person receives a certificate or receipt
- Authorizing to make or deliver a document certifying receipt of property used, or to be used, by the Government and, intending to defraud the Government, making or delivering the receipt without completely knowing that the information on the receipt is true
- Knowingly buying, or receiving as a pledge of an obligation or debt, public property from an officer or employee of the Government, or a member of the Armed Forces, who lawfully may not sell or pledge the property
- Knowingly making, using, or causing to be made or used, a false record or statement to conceal, avoid, or decrease an obligation to pay or transmit money or property to the Government

The False Claims Act also provides protection from retaliatory acts committed by an employer against an employee for investigating or reporting violations. Remedies can include employment reinstatement, back pay and other compensation.

NO RETALIATION

Like federal law and Premier policy, Ohio law prohibits employers from retaliating, discriminating or harassing employees because of their lawful participation in a false claims disclosure or their refusal to assist employers in violating laws. These laws also provide for certain monetary awards and equitable relief to the prevailing plaintiff including compensation for lost wages and reinstatement to a former position.

Ohio's whistleblower law, unlike other laws, requires an employee to notify his/her employer, both orally and in writing of any suspected illegal activity, policy or practice before disclosing it to the appropriate government agency. The purpose of this particular requirement is to give the employer a reasonable opportunity to correct the activity, policy or practice. If the employer does not make a good faith effort to correct the asserted violation within 24 hours of receiving notice, the employee may file a written report of the violation with the county prosecuting attorney, law enforcement, any governmental entity that has regulatory authority over the employer or the inspector general.

Any employee who engages in or condones any form of retaliation against another employee because that employee either (1) reported a potential violation of the Code or a government law or regulation, or (2) refused to violate the Code or a government law or regulation, will be subject to disciplinary action up to and including separation of employment.

WORKPLACE PRACTICES

Premier leaders recognize that it is not possible for Team Members to know every law and regulation that exists. However, Team Members should be aware of the rules that apply to their job responsibilities. Team Leaders are responsible for ensuring that their Team Members are appropriately informed about relevant regulatory requirements, and that they are adequately supervised.

This Code was prepared for all Team Members. We hope you will find it helpful whether you are a newcomer or a Team Member of long duration. We have tried to make this booklet as complete as possible. However, because ethics and compliance policies require almost constant updating to meet the needs of a changing environment, the policies stated here may be revised, amended or deleted as necessary. Changes will be reflected in a subsequent printing or communicated through management.

**Premier Health Insuring Corporation / Premier Health Plan of Ohio
Compliance Hotline: 1-844-348-7822.**



Corporate Compliance
110N.Main,Suite930
Dayton,Ohio45402

Reviewed and Revised:
[May 2017]