
GUIDED BY INTEGRITY

CODE OF CONDUCT



Kansas City

BlueKC.com

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WELCOME TO OUR CODE OF CONDUCT

In every interaction, Blue KC strives to give members the best healthcare coverage and service possible. It's because we care – because you, our workforce, have spent over 85 years being champions of our members' health and wellness.

That level of care and trust is what we're known for, and with your help, we always will be. No matter our jobs, everyone at Blue KC holds our Company's reputation in our hands. We preserve it by showing integrity in every action and decision. Our Code of Conduct ("Code") helps us succeed. It guides us to make good choices for Blue KC and everyone we serve. Those choices make us stronger, reflect our Core Values and show the world who we are.

Every day, you navigate ethical situations, from simple choices to complex transactions where multiple laws and policies apply. The Code helps you handle all of them the Blue KC way, in a way that shows our Core Values in action. When you read the Code and look to it often, you will be Guided by Integrity. You'll know how to spot harmful activity, speak up when something isn't right and find help when you need it.

It's important to us that you know how much your contributions matter at Blue KC. Your perspectives, your talent, and above all, the care you put into your work make an extraordinary difference to Blue KC and our community. Thank you for all you do to help build the best Blue KC we can be.

Erin Stucky

President and Chief Executive Officer

OUR CORE VALUES IN ACTION



HEALTHIEST LIFE

We are dedicated to improving the health of our community.



EXCELLENCE

We honor our commitments.



EMPOWERMENT

We are trusted to advance our mission.

More than just words on a page, our Core Values represent who we are at Blue KC. It's up to us to embody them and turn them into tangible actions each day.



BETTER TOGETHER

We achieve the best results when we partner as one team.



INCLUSION

We value differences and respect our members, our community, and each other.



INTEGRITY

Integrity is more than knowing what’s right. It’s about doing what’s right and choosing the path paved with our Core Values. Our Code shows you the way.

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INTRODUCTION

More than one million members trust their healthcare to Blue KC. To give our members our best, we need to be our best. This starts by understanding our Code of Conduct.

Let that sink in ...

More than one million people turn to us because we make their healthcare more dependable and affordable. It's a great honor and a tremendous responsibility. After all, we know how complicated healthcare can be, and our members need us as their guide.

To be the best guides we can be, we need to know what's expected of us as members of the Blue KC team and what rules apply to our work. The Code of Conduct is here to help us:

- Follow the laws and regulations that apply to us
- Navigate ethical situations
- Build a culture of integrity
- Do what's right for Blue KC and our members
- Find resources for help
- Speak up about any concerns

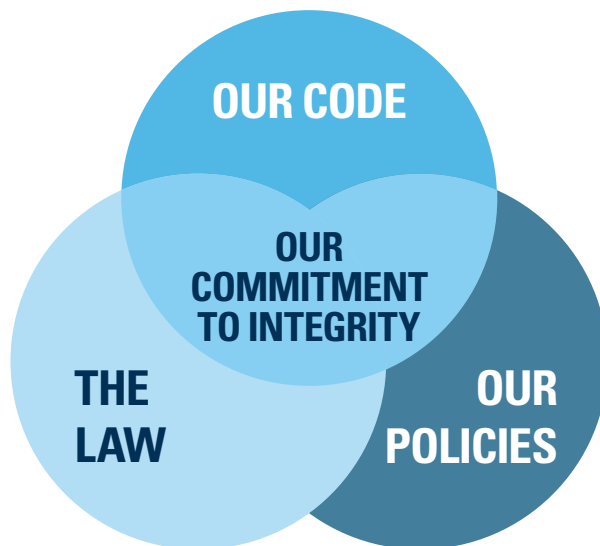
Approved by the Board of Directors, the Code sets the tone for the way we do business. It's a vital part of Blue KC's Compliance Program, which helps ensure we're all following the rules and doing what's right.

Who Follows the Code of Conduct?

We must all follow the Code. It applies to full-time and part-time employees, contingent workers, Officers, members of the Board of Directors, consultants, vendors, and volunteers of Blue KC (our "workforce").



The Heart of Our Compliance Program



What About Our Third Parties?

Our third parties act as an extension of our business. We hold them to the same high standards and expect them to follow Blue KC's Code. That includes:

- Consultants
- First-tier, Downstream and Related Entities ("FDRs") of our health plan operations
- Agents and brokers
- Vendors
- Business partners

DO YOUR PART

Every day at work we make decisions, we collaborate, we interact. Each action, no matter how small, impacts Blue KC, our members, and our reputation, so it's critically important to understand your responsibilities and take them seriously.

If you're part of our workforce:

Live our Core Values

Weave our Core Values into everything you do on behalf of Blue KC. Let them inspire every action and avoid anything that could appear inappropriate.

Follow the rules

Many federal, state, and local laws and regulations apply to us. Follow them all in letter and spirit, along with our Code, policies, and contracts, including requirements for:

- Federal healthcare programs
- Licensing
- Centers for Medicare & Medicaid Services

Ask for help

Take all required training. If any policy or requirement is unclear to you, [ask questions](#).

Speak up

If you make a mistake or become aware of a possible violation of our Code, policies, or the law, [report it](#) immediately.

Be a problem solver

When called upon, cooperate with Blue KC's Legal, Human Resources, and Compliance Teams on internal investigations, audits, or inquiries – be honest and timely.



Did You Know?

As an independent licensee of the Blue Cross Blue Shield Association (BCBSA), Blue KC must also honor the BCBSA's special standards and inter-plan program policies that address the way we:

- Market our products
- Protect our brand
- Report misconduct
- Report financial performance
- Monitor and disclose information

To find out more about each plan's requirements, visit [BlueWeb](#).

If you're a leader:

Model integrity

Remember your team looks to you. Show them what it means to be Guided by Integrity by never cutting ethical corners. Uphold our Code and Core Values in every action.

Talk up the Code

Help keep the Code top-of-mind by openly using it and referring your team to it often. Make sure everyone you manage knows it, follows it, and speaks up when something doesn't seem right.

Keep training on track

Also make sure your team completes all required training – no exceptions.

Keep an open door

Make time for your team when they want to talk. Listen well, offer guidance, and watch for retaliation. Be able to answer their questions or help them find answers.

Be proactive

If you're aware of possible misconduct, remember your duty to [report it](#). Don't ignore it or investigate it yourself. Speak up immediately.

What About Violations?

If someone or something violates the Code, our policies, or the law, it also violates the trust our members place in us. We take violations seriously. They can lead to consequences for anyone involved, including coaching or disciplinary action and possible termination of employment or contract. If a law is broken, more serious consequences may apply, including legal liability, fines, and civil or criminal penalties.

Do We Ever Make Exceptions?

We are expected to always follow the Code. On rare occasions, when a situation requires it, we may make exceptions to certain provisions of our Code. Requests for exceptions must be submitted in writing to the Compliance Team through [Report a Concern](#). All exceptions will be reviewed by the Chief Audit, Compliance, and Risk Officer, and in select situations, the Compliance Committee and/or the Board of Directors. Decisions will be communicated in writing, and properly documented, if the law requires.

Because laws and requirements sometimes change, Blue KC may modify the Code or our policies and procedures at any time in response. If we do make updates, we will promptly communicate the changes and explain why they're needed.



CHOOSE WHAT'S RIGHT

The decisions we make each day, when we make them with our Core Values in mind, enhance Blue KC's culture. We count on you to choose what's right.

But if the right choice isn't clear, don't proceed. First ask yourself:

Is this action legal?

Does it reflect
our Core Values?

Is it allowed by our
Code and policies?

Does this help Blue KC
and our members?

Do I have enough information
to make a good decision?

Would I be proud to tell others
about this action?

Did you answer **"yes"** to every question? If so, you can probably proceed. But even one **"no"** or **"maybe"** answer is a sign to stop and [ask for help](#).

KNOW HOW AND WHEN TO SPEAK UP

When you have concerns about possible misconduct, speaking up is the best choice, and it's also your obligation. If we stay silent, we allow harm to be done to Blue KC and those we serve. Remember, it only takes one person to affect positive change. When you [let us know](#) about misconduct, you could be the one who makes a difference.

What Are My Options?

We realize speaking up takes courage. That's why we do our part to make reporting easy for you and help you feel safe sharing your concerns and confident your voice will be heard. What's most important is you make your report honestly and in good faith (sincerely and without malice).

To report misconduct allegations, contact:

- Your manager or any other manager
- Corporate Compliance:

 Email CorporateCompliance@BlueKC.com

 [Report a Concern](#)

- [Human Resources](#)
- The [Legal Department](#)

For Medicare Advantage and Part D Compliance:

- Contact the [Medicare Advantage Compliance Officer](#)

 Email MACompliance@BlueKC.com

 Visit the [MA Compliance Homepage](#)

- [Report a Concern](#)

Or, if you prefer an **anonymous** option, you may report ANY type of concern to:

 Compliance Hotline: 1-844-227-1790

This service is available 24 hours a day, 365 days a year and is operated by an independent third party. An operator will help you document your concern and forward it to the appropriate resource at Blue KC. While you do have the option to remain anonymous, giving us your name helps us conduct a more effective and thorough investigation.

Is It Time to Speak Up?

Yes, it is whenever you:

- Aren't sure how to handle a certain situation
- See or suspect a violation of our Code, policies, or the law anywhere in our business
- Feel pressured to do something improper
- Believe you're facing a conflict of interest or another improper situation
- Receive or offer a gift

Remember, it's never wrong to ask for guidance. Speaking up is always the best choice.



What Happens After I Speak Up?

No matter which way you choose to report your concern, Blue KC will take your report seriously. We'll investigate it thoroughly and promptly, protecting confidentiality, along with your rights and the rights of those involved.

We may also ask you to help with internal or external investigations. If we do, we expect your honest and complete cooperation. If a violation of our Code, policies, or the law has occurred, we will take appropriate corrective action, but due to confidentiality, we may not be able to notify you of all actions taken.

No Retaliation

We don't tolerate retaliation of any kind against anyone who reports a concern in good faith or helps with an investigation.

Retaliation might look like:

- Threats, including threats of termination
- Unfounded negative job reviews
- Demotion or reassignment
- Pay reduction
- Denial of opportunities
- Exclusion from meetings or activities

Even if a report turns out to be unfounded, we won't permit retaliation, which violates our Code, our Core Values and Blue KC's high ethical standards. Retaliation can lead to disciplinary action, including termination of employment. If you see or experience retaliation, [report it](#) immediately.

What If?



Q. There's something I'm concerned about, but I only know part of the story. I'm afraid I'll face retaliation if I'm wrong. Should I wait to speak up until I have more details?

A. No, you shouldn't. There's no need to confirm your suspicions or build a case with details. As soon as you have a concern, speak up and [report it](#). Just be honest and give as much information as you can. We'll do the investigating, and we won't tolerate any retaliation against you.

Q. A senior manager has asked me to do something that doesn't sound right to me, and it might even violate our policies. I can't refuse this person's request, can I?

A. Yes, you can. Nobody at Blue KC, no matter how high up in the Company, is authorized to ask you to do something that violates Company policies or the law. Speak up and ask for guidance to make sure everyone at Blue KC upholds our Code and our Core Values.

Find Out More



[Employee Handbook](#)





RESPECT

Our business is all about people – helping them, caring for them, respecting them. We want the same for our Blue KC team so we can provide a workplace where everyone feels respected, valued, and protected.

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PROMOTE DIVERSITY, EQUITY, AND INCLUSION

We're proud of our workforce – a diverse array of individuals with unique backgrounds, experiences, and talents. Each of them deserves to be equally valued, included, and empowered.

Show You Care

Ensure equal opportunity. If you make employment decisions for Blue KC, follow all employment laws and Blue KC Employment Policies. Be fair and always ensure equity, whether you're interviewing, hiring, promoting, or dismissing employees. Base employment decisions only on business requirements and on individuals' skills and qualifications.

Provide equal access. Help ensure every person at Blue KC has an equal and equitable opportunity to participate and succeed. That means giving every individual equal access to the same resources and opportunities, such as education, training, equipment, and accommodations.

Ask for help. We know employment laws and procedures can be complex and sensitive. If you're ever unsure about these rules, contact the [Legal Department](#) and [let us know](#) if you experience or suspect unfair treatment anywhere in our operations.

Prevent discrimination and bias. In every interaction and decision, no matter who is involved, act fairly. Appreciate each person's unique qualities and contributions and never discriminate against or favor them based on personal characteristics which may be protected by law, including:

- Race
- Color
- Religion
- Sex (including pregnancy, sexual orientation, gender expression, or gender identity)
- National origin
- Age
- Marital or family status
- Veteran status
- Disability and genetic information (including family medical history)

BELONGING AT BLUE



Am I Being Biased?

It can be hard to tell. To prevent bias:

- Look for new sources of input and participation. (New voices can bring different, sometimes better ideas.)
- Listen first.
- Consider everyone's input.

What Does Bias Look Like?

It can take different forms, including but not limited to:

Affinity bias – Being drawn to people who are most like you

Appearance bias – Judging someone based on how they look

Confirmation bias – Interpreting data to support your beliefs

Gender bias – Preferring one gender over another

Age bias – Treating someone unfavorably because of their age

What If?



Q. I believe a coworker may have rejected an applicant based on their medical condition. Since this person isn't actually a Blue KC employee, should I just let this go?

A. No, you shouldn't. We want to prevent discrimination at every point in our employment process, including screening candidates. Speak up to make sure we're following the law and reflecting our Core Values.

Find Out More



[Employee Handbook](#)

[Diversity, Equity, and Inclusion at Blue KC](#)



SHOW RESPECT

We believe respect is the cornerstone of a positive and engaging work experience. Harassment and disrespect undermine that experience and our business, and we won't tolerate it anywhere at Blue KC.

Show You Care

Connect with respect. Interactions are a large part of our work at Blue KC. Whether you're engaging with coworkers, members, brokers, providers, third parties, or the public, show respect in every interaction. Never allow harassment, intimidation, bullying, or other negative treatment to enter the conversation.

Recognize harassment. To make sure respect is the norm at Blue KC, you need to be able to spot harassment in all its forms. It can be out in the open, subtle – or even unintentional. No matter its form, harassment creates a hostile or negative work environment for us all.

Prevent sexual harassment. Stay alert for sexual harassment, a type of harassment that can happen to anyone including employees or non-employees of any gender. It can occur in or out of the workplace and involve unwelcome advances or physical contact, sharing of sexual materials, or sexual requests.

Watch your own behavior. A large part of harassment is perception. Be aware that if someone sees your behavior as negative or it makes it hard for that person to do their job, that is what matters most. Put yourself in the other person's place and treat them as you would want to be treated – with respect.

Speak out against harassment. If you see signs of harassment anywhere in our business or if you experience it yourself, don't ignore it. [Report it](#) immediately and remember, we won't tolerate retaliation against you.

Harassment includes ...

Unwanted, offensive behavior that's either:

- Physical
- Emotional
- Verbal
- Mental
- Sexual

It can involve:

- Inappropriate physical contact
- Offensive comments
- Any behavior perceived as offensive
- Offensive material or gestures

Find Out More



[Employee Handbook](#)



MAINTAIN A SAFE WORK ENVIRONMENT

A safe work environment is essential to our well-being and our success, and we all play a role in maintaining it. In many cases, you are the first line of defense for the organization.

Show You Care

Play it safe. Staying safe starts with you following Blue KC's rules and procedures. Know the health, safety, and environmental rules for your job and your location and follow them without exception.

Arrive ready to work. Whether you are a remote, hybrid, or in-office worker both Blue KC and our members expect excellence from us at all times. Performing work while impaired is not tolerated (whether illegal drugs or controlled substances). It puts your performance, your health, and the health of those around you at risk.

Don't tolerate violence. Nobody should ever feel unsafe in the Blue KC building. We rely on you to help keep weapons, threats, or acts of violence out of our workplace and our property (even in vehicles in our parking lots). Watch for signs of violence and [let us know](#) about them immediately. You could potentially save lives.

Stay alert and speak up. If you become aware of any potential hazards or threats to safety, report them immediately to Security through [Workplace Services – Physical Security](#) so Blue KC can take appropriate action. In case of immediate danger or serious injury, contact local emergency services first, then contact Blue KC Security.

What Should I Report?

Report anything potentially harmful, including:

- Potential substance abuse
- Safety violations
- Hazardous work conditions
- Weapons on our property (including in vehicles)
- Unauthorized individuals in our building
- Threats (verbal or physical)
- Intentional damage of personal or Blue KC property

What If?



Q. When I arrived at work this morning, someone I didn't recognize was standing by the employee entrance waiting to go inside. She said she forgot her badge, so I let her in with me. Was that OK?

A. No, it's important that every person in our building is authorized to be there and properly checked in. To protect our building and our employees, you should politely direct this person to press the call button to contact Security, or you can escort them directly to one of the security desks to check in.

Find Out More



[Employee Handbook](#)

[Facilities Access and Parking Policy](#)

[Remote Working Policy](#)

[Physical Security Policy](#)

[Workplace Services Homepage](#)



PROTECTION

When we take ownership of our attitudes and actions toward Blue KC, we do what’s best for it. We protect it and set Blue KC up for success, no matter what challenges come our way.

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USE OUR ASSETS RESPONSIBLY

We invest in the people and resources to keep our Company running. As employees, it's our job to handle Blue KC's assets with care and protect them as we would our own.

Show You Care

Be protective. Regardless of your job, you use Blue KC's assets to do your work, and we expect you to do so responsibly, legally, and for legitimate business purposes. Never use them for personal gain or in a way that's improper or violates our policies or the rights of others. To ensure proper use:

- Follow our policies at all times to secure our physical and information assets.
- Only use assets for business purposes.
- Never lend, borrow, or dispose of our assets.
- Never use our assets to harass anyone or to share inappropriate, sexual, or derogatory content.



WHAT SHOULD I PROTECT?

Physical Assets	Information	Reputation
Resources we can see and touch, such as: <ul style="list-style-type: none">• Facilities• Furniture• Office equipment• Tools and hardware• Office supplies• Blue KC funds	The information, devices, and systems supporting our business, such as: <ul style="list-style-type: none">• Computer systems and software• Internet access• Email, voicemail, and messaging systems• Company intranet• Video conferencing, phones, and mobile devices• Networks and databases• Confidential information, intellectual property, and personal data	Blue KC's identity – our brand and legacy, as seen in our: <ul style="list-style-type: none">• Name and logo usage• Communications• Interactions• Service quality• Use of Blue KC's time• Activities outside of work• Public relations and social media

Focus on cybersecurity. Protecting our electronic and information assets from unauthorized access takes special care and attention. Watch for potential threats and follow our IT policies and cybersecurity rules carefully, including:

- Create strong passwords. Update them regularly and don't share them with anyone.
- Only use Blue KC-approved hardware, software, and applications.
- Never click on suspicious emails, links, or downloads.
- Don't use unsecured networks, like public Wi-Fi to access or share our information.
- Do not attempt to bypass security systems or other security controls.
- Only use VDI to access Blue KC systems from a non-Blue KC device when traveling outside of the United States.
- [Contact the Information Security Team](#) if you see or suspect a security breach or unauthorized access to our systems or data.



What If?



Q. I have a part-time catering business. If this work doesn't compete with Blue KC's business, is it OK to occasionally send out emails using Blue KC's systems?

A. No, it isn't. Our email systems are Company property and intended for Company use only. Even though you're not competing with Blue KC's business, you shouldn't use our resources for your own benefit.

Find Out More



[Information Security Policies Standards, and Guidelines](#)

[Asset Management Policy](#)

[Password Protection Policy](#)

[Network Security Policy](#)

[Social Media Policy](#)

AVOID CONFLICTS OF INTEREST

We all have loyalties to the people and things we care about. But sometimes loyalties can compete, forming a conflict of interest. Blue KC relies on us to avoid conflicts and do what's best for our Company.

Show You Care

Act in our best interests. If you feel you're having to choose between what's good for you and what's good for Blue KC, you may be facing a conflict of interest, a situation that could unfairly benefit you and influence the work you do for us. Even the appearance of a conflict can seriously damage our reputation, so watch for them and steer clear of them.

Disclose conflicts. If you believe you're getting involved in a situation that could benefit you while possibly harming Blue KC or call your loyalty into question, disclose it immediately to [Corporate Compliance](#) even if you're not sure. Disclosing allows Blue KC to help you avoid or resolve a conflict and prevent harm.

Learn to spot conflicts. It's not always easy to identify conflicts of interest, but you can only stay away from them if you watch for them. Certain situations often lead to conflicts, including but not limited to:

- Either requesting or accepting improper favors, [gifts](#), or [entertainment](#)
- Accepting a second job, consulting, or having personal business dealings with a competitor, customer, supplier or business partner that could affect your performance or our reputation
- Serving on a Board of Directors for a competitor or a current or potential Blue KC third party, subsidiary, or affiliate
- Supervising a family member or friend or making employment or health plan decisions that could benefit them
- Having a personal or romantic relationship that might influence your decision-making
- Investing significantly in a Blue KC vendor or other business partner
- Handling business transactions that involve you or your family or friends
- Using Blue KC's resources, contacts, or information for personal gain



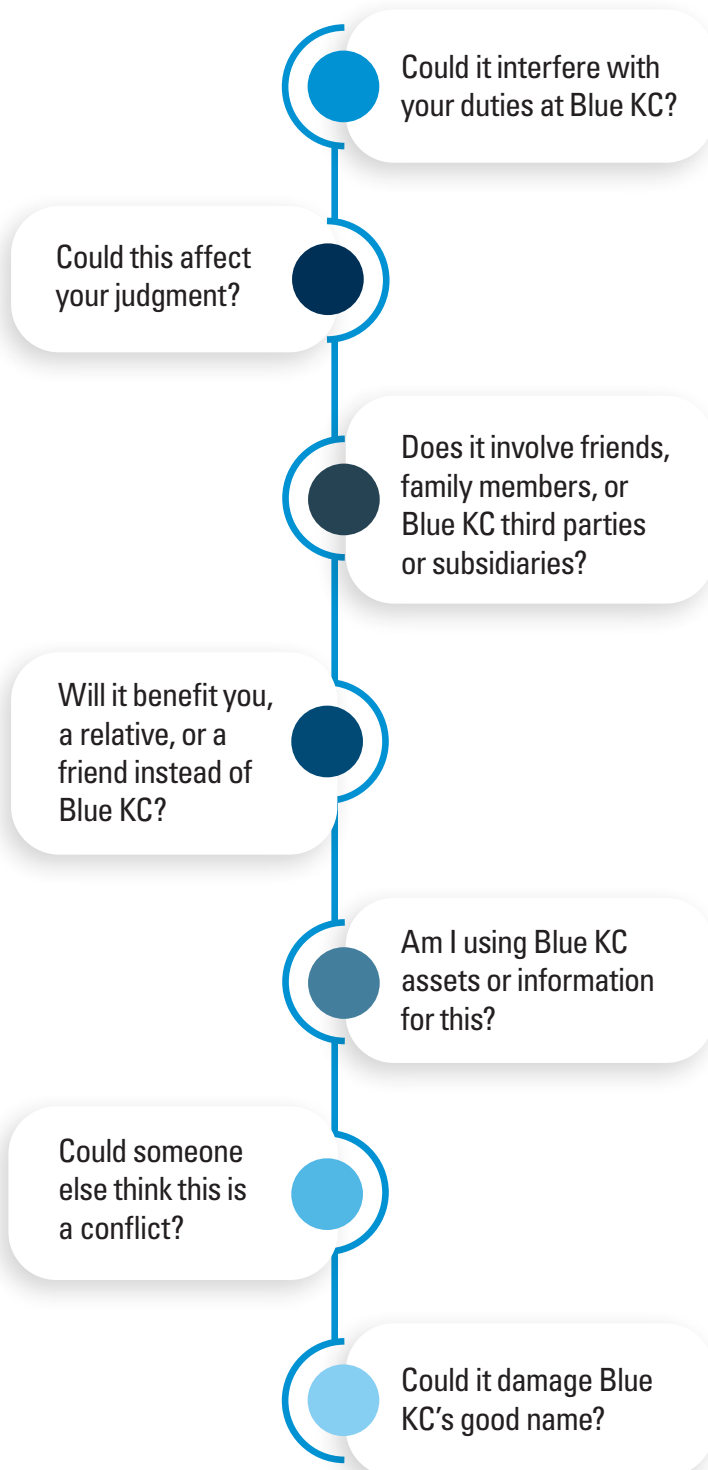
What If?



- Q.** My spouse works for a third party that's in the running to become a Blue KC vendor. Since I don't select our vendors and my spouse doesn't own this company, do I need to disclose this?
- A.** Yes, you do. It is good that you're not involved in the selection process, but it's possible for conflicts to arise down the road if this company becomes our vendor, especially if your work eventually involves managing or monitoring this vendor in any way. Report the conflict of interest so it can be reviewed, and guidance can be offered. If needed, we will engage your manager or HR to make an appropriate plan.

Could This Be a Conflict?

Ask yourself the following questions. Any “**yes**” or “**maybe**” answers could mean you have a potential conflict. Disclose it immediately.



What If?



- Q.** I have accepted a part-time retail job on weekends. Since this doesn't compete with Blue KC's business, it's not a conflict, right?
- A.** It may not be, but it depends, and you need to [report it](#). Even if this second job doesn't interfere with your ability to do your work for Blue KC, it could lead to a conflict. Secondary employment must be reported so it can be reviewed and guidance will be offered. If needed, we will engage your manager or HR to make an appropriate plan. In addition, keep this work separate from your Blue KC responsibilities, and don't let it affect your decisions or use Blue KC time or resources to do it.

Find Out More



[Conflicts of Interest Policy](#)



ENSURE DATA PRIVACY

We don't just serve people. We respect them and their privacy. When we collect and handle personal information, we treat it with the utmost care and follow the laws that help protect it.

Show You Care

Know the rules. Healthcare is personal business, and managing it involves handling protected health information ("PHI") and personally identifiable information ("PII") that we must protect. Know and carefully follow all data privacy laws whenever you collect, access, or handle personal information, whether it belongs to our associates, members, customers, or third parties. Following these laws helps us protect plan privacy and prevent personal data from unauthorized disclosure, misuse, or loss. If you're not clear on any requirement, [ask for help](#).



Recognize personal information. If information can be used to identify someone, that's personal information. It includes PII and PHI, such as:

- Name, address, phone number, or email
- Birthdate
- Social Security number
- Driver's license number
- Banking or credit card information
- Medical information, including treatment, health status, and medical history
- Information on claims payment and benefits
- Location data
- Employee identification numbers

Privacy Self-Check

Be able to check off each item:

When I handle personal data, I always ...

- ☒ Follow the law and our cybersecurity policies.
- ☒ Use personal data for legitimate business only.
- ☒ Collect only the information I need.
- ☒ Share it only with authorized entities.
- ☒ Store and dispose of personal data the proper, legal way.

Speak up to stop a breach. One of the best ways to respect privacy is to speak up if you suspect a possible personal data breach. [Report a Concern](#) or contact the [Privacy Office](#) immediately.

What If?



Q. My work responsibilities require me to send PHI to an external recipient. How do I send the information securely?

A. When sending ad-hoc or infrequent files, we recommend you use a secure file transfer process to deliver the file(s) to external users. Check with your manager on the preferred tool. For recurring files, work with the Blue KC File Transfer Team to set up an SFTP with PGP encryption. Make sure the files always include the minimum necessary information for the request and verify the external user's email address prior to sending.

Find Out More



[The HIPAA Resource Center](#)

[Privacy Office Homepage](#)

[HIPAA Privacy Policy](#)

[Confidentiality of Business Information Policy](#)

[Acceptable Use of Information Systems Policy](#)



PROTECT CONFIDENTIAL INFORMATION AND INTELLECTUAL PROPERTY

We create and gather a great deal of information at Blue KC that must be protected. When we prevent misuse and disclosure of critical information, we also protect our relationships and our reputation.

Show You Care

Know what to protect. Through your job, you may have access to information that's unavailable to the public and could be harmful to either Blue KC, our members, or our business partners if it's exposed. It's up to you to recognize confidential information and intellectual property and safeguard it.

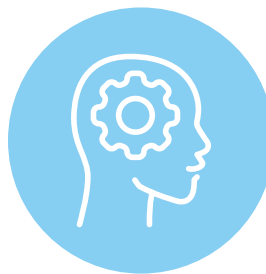
Secure personal information. Our work involves collecting protected health information ("PHI") and personally identifiable information ("PII") from members, customers, employees, and third parties. Follow all data privacy laws and storage guidelines to protect it. See [Ensure Data Privacy](#) to learn more.



Confidential Information is ...

Not publicly available, and it's important to our operations and relationships, including:

- Restricted information like passwords and encryption keys
- Research
- Acquisition or investment plans
- Financial data
- Contracts
- Workforce, member, or third-party lists
- PHI such as health plan data or member data
- PII such as provider or broker data



Intellectual Property is ...

Something created – ideas and information that make a company unique and competitive, including:

- Trademarked, copyrighted, and patented materials
- Proprietary software
- Trade secrets, inventions, or techniques
- Publications and data sources
- Marketing or strategic plans
- Branding and logos

Take care. When accessing or handling confidential and proprietary information:

- Follow all laws and Blue KC policies, procedures, and contract terms that apply.
- Only access information you are authorized to handle.
- Use the minimum amount of information needed.
- Never share this information with any unauthorized person or entity.

Not sure if information is confidential? Treat it as if it is or ask the [Privacy Officer](#).

Protect everyone's information. Remember, we don't just handle Blue KC's information. We may also handle confidential information and intellectual property belonging to others like third parties and other organizations. Be just as protective with this information and follow all applicable rules, laws, and policies.

Find Out More



[Confidentiality of Business Information Policy](#)

[Acceptable Use of Information Systems Policy](#)

[HIPAA Privacy Policy](#)

[Data Classification Policy](#)

[The HIPAA Resource Center](#)

[Privacy Office Homepage](#)

Adopt Good Security Habits

- Working remotely? Never let others use your Blue KC access, hear your conversations, or view your devices.
- Securely store and dispose of documents.
- Immediately report lost or stolen equipment.
- Never store information on personal devices – use approved Blue KC systems and applications.



COMMUNICATE RESPONSIBLY

When we communicate, we connect with others. By highlighting honesty and integrity in every communication, both inside and outside of Blue KC, we strengthen our connections and our reputation.

Show You Care

Let Blue KC speak for itself. To communicate ethically and effectively, Blue KC must maintain consistent messaging. That’s why you should never speak on Blue KC’s behalf. Let our authorized representatives do the talking. Sending careless, incorrect, or conflicting messages can put us at risk of:

- Violating our Code, policies, or the law
- Misleading others
- Making promises we can’t keep
- Having [anti-competitive conversations](#)
- Disclosing [confidential or intellectual property](#)
- Being exposed to additional, unnecessary legal risk

Properly route requests. If you receive requests for comment from the media or other sources, and you’re not authorized to handle them, don’t claim to speak for Blue KC or try to handle the request. Instead, refer it to the right Blue KC resource.



WHERE DO I REFER REQUESTS?	
Media requests	Don’t comment or give an interview. Refer them to Corporate Communications Department.
Member requests	Refer them to Customer Experience Team .
Requests for articles, speeches, or public appearances	Talk to your manager first, then get approval from Corporate Communications Department.
Legal document or request	Engage the Legal Department as soon as reasonably possible. Do not respond to or produce any documents without the involvement and approval of Blue KC legal.
Requests for employment verification or references	Do not provide information about your current or former coworkers. Direct these requests to Human Resources .

Use care with social media. We encourage you to use social media to share, learn, and connect, but the way you use it reflects on Blue KC. Anyone can see what you post, so remember:

- Be courteous and helpful, always demonstrating our Core Values and following our policies.
- Never post anything illegal, false, misleading, harmful, harassing, or discriminatory.
- Never share confidential or personal information or intellectual property.
- Keep our members, customers, and third parties out of your posts.
- If you do mention Blue KC, make it clear you work for us, but you don't speak for us.

What If?



Q. Someone on social media was discussing Blue KC and claiming something that isn't true. I could easily correct it. If I am polite and accurate, may I respond?

A. No, you may not. We appreciate your desire to help, but even if you have the right answer, if you're not authorized to speak for us, you may say something that doesn't align with our messaging. Notify your manager so we can give a proper response.

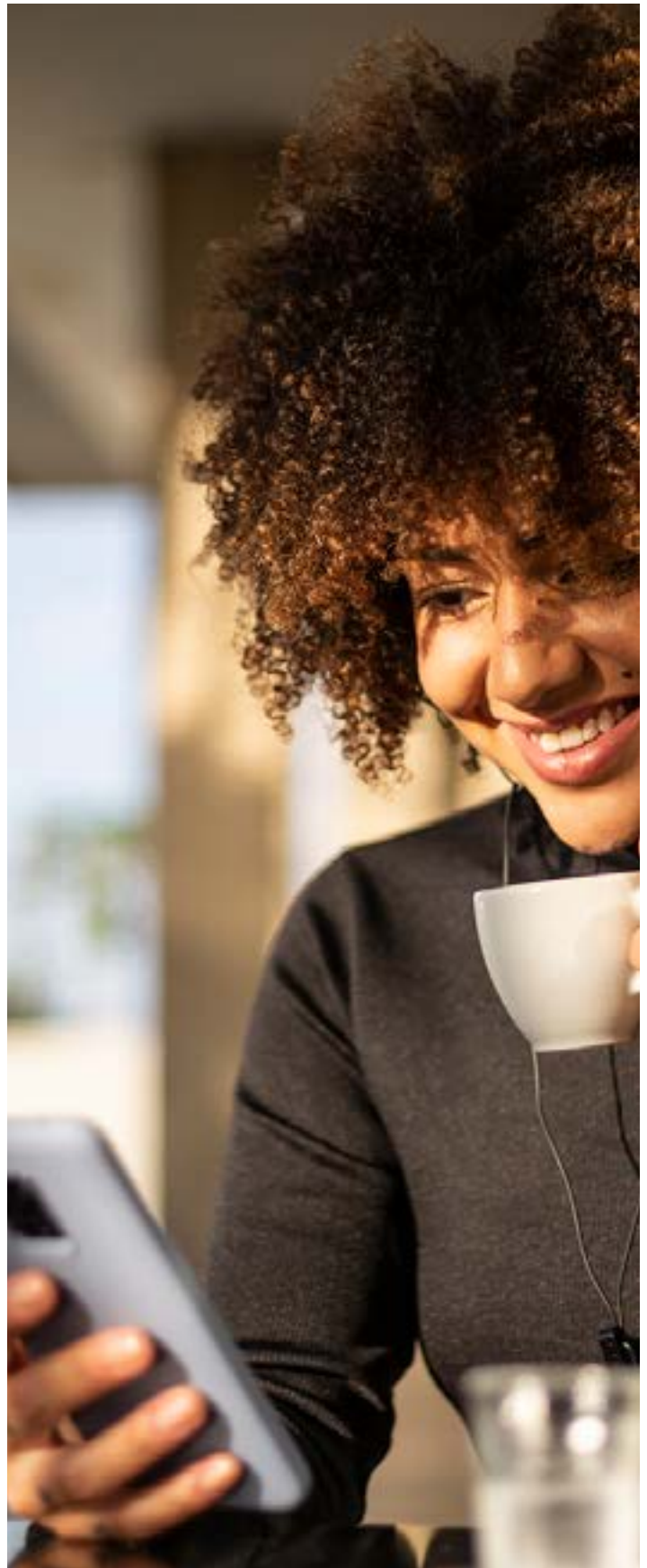
Find Out More



[Legal Document or Other Legal Request Policy](#)

[Media Relations Policy](#)

[Social Media Policy](#)



USE ARTIFICIAL INTELLIGENCE PROPERLY

AI is rapidly changing our world and our work. We welcome these advances, including Generative Artificial Intelligence (Gen AI), and are committed to using and developing AI responsibly and ethically.

Show You Care

Follow the rules. We follow BCBSA and Industry guidelines. AI usage will be strictly governed within the Blue KC information technology operating environment including hardware, software, telework, SaaS, various networks, and Data Centers. Adherence to specified risk management policies and standards following established processes and procedures is required. This applies to the use of any large language or GenAI tools that have not been previously approved for Blue KC work purposes. The use of personal computers or other non-Blue KC devices logged into GenAI tool platforms to perform Blue KC work is prohibited.

Protect information. Remember, GenAI tools and platforms consume information to learn and adapt. Where confidential, corporate, personal information (PHI and PII), or intellectual property are involved, only approved vendors, solutions, and/or use cases are allowed. Additionally, the use of publicly available AI tools where Blue KC has no legal or contractual control over data ownership, or its use is prohibited. Ask your manager or Information Security Team for help if you're unsure if information is acceptable to input.

Review AI output. You should always verify the output of GenAI tools is accurate and factual. Check for false citations or outdated or unreliable information and verify that the response is not biased and doesn't violate any Blue KC legal, regulatory, or contractual requirements or Blue KC standards for professional communication. Never use these outputs to make business decisions for Blue KC, and if you develop software, never put GenAI code into any software or product Blue KC develops or authorizes for use by third parties.



What Is Generative AI?

GenAI is a form of AI, the role of which should be to enhance and amplify various work and research efforts rather than completely replacing them. The value of using GenAI tools must outweigh the risks the tools introduce to Blue KC. GenAI tools are not a substitute for human judgment.

Blue KC Pillars of Responsible AI:



Find Out More



[Generative Artificial Intelligence Products
Acceptable Use](#)

[Acceptable Use of Information Systems Policy](#)

[Information Security Exception Policy](#)

[Data Protection Policy](#)



MAINTAIN BUSINESS CONTINUITY

Emergencies can happen at any time, and we must be ready for them. You can help keep Blue KC through any challenge by being alert and responsive and complying with our continuity plans.

Show You Care

Know what to do. Whether emergencies are technological, naturally occurring or human-caused events, they can impact our operations and our members. We expect you to be prepared by understanding and complying with our business continuity plans, including departmental plans, emergency notification, and evacuation procedures.

Know your role. If you're the business process owner and use a critical vendor, ensure that your departmental plan is developed, tested, and communicated to limit disruption from service when an outage or failure occurs. Work with internal and external parties on an ongoing basis to continually improve internal controls and create plans to correct any deficiencies.

Get cross-trained. One of the best things we can do to respond to emergencies is have a multi-skilled workforce. Consider learning new skills so you can step into another employee's job if needed. You won't just help Blue KC. You'll broaden your own skill set in the process.

What Does a Business Continuity Plan Do?

It helps us:

- Prepare for emergencies
- Adapt to change
- Empower our workforce to take proper action
- Maintain service
- Minimize losses

Find Out More



[Business Continuity Management Program Policy](#)
[Enterprise Risk Management Policy](#)





RESPONSIBILITY

Operating responsibly and honestly isn't just a choice for us. It's the foundation on which we build trust in the Blue KC name.

- Be a Good Government Partner32
- Partner Responsibly With Third Parties34
- Follow Gift and Entertainment Rules36
- Keep Accurate Records38
- Prevent Bribery and Corruption.....39
- Support Best Business Practices41
- Prevent Fraud, Waste, and Abuse.....43
- Ensure Excellence.....45
- Ensure Ethical Political Participation.....46

BE A GOOD GOVERNMENT PARTNER

We act honestly and responsibly with our government partners by being responsive, transparent, and committed to following the law and the highest ethical standards.

Show You Care

Interact carefully with government

officials. Remember, government interactions usually involve stricter rules than private ones, so know what's required of you and use extra caution when dealing with any government official.

Follow contracting rules. Blue KC deals with a variety of federal, state, and local government entities and agencies. If government contracting is a part of your work:

- Be honest and fair, following applicable laws, program policies, and contract requirements along with Blue KC's policies and Core Values.
- Ensure statements, disclosures (including pricing), invoices, and reports made to government customers are current, accurate, and complete. Providing false information could lead to serious civil or criminal penalties for you and Blue KC.
- Immediately [report](#) potential fraud or misconduct.

Use care with gifts and entertainment.

Special rules apply to any offers of gifts or entertainment to government officials. Know and follow these rules along with our policies. If it's not clear if an offer is appropriate, ask [Corporate Compliance](#). To learn more, see [Follow Gift and Entertainment Rules](#).



Is This a Government Official?

They are if they're affiliated with:

- Federal Marketplaces (i.e., Kansas and Missouri Exchanges)
- Medicare Advantage and Part D
- Federal Employee Health Benefit Program ("FEHBP")
- Government entity or agency customers
- [Political parties or candidates](#)

Not sure? Treat the individual as a government official and follow the rules.

Fulfilling government requests. At Blue KC, we comply fully with all government investigations, audits, and information requests. If a government official contacts you, reach out to the [Legal Department](#) and [Corporate Compliance](#) for help. Remember:

- Be honest and transparent when responding to government requests.
- Get authorization from the Legal Department before providing Blue KC business records.
- Never mislead anyone, impede their work, or conceal or alter records.

Check before hiring government

employees. Special rules apply to hiring current or former government personnel. To prevent Blue KC from gaining an unfair advantage, follow the rules for hiring these individuals before you begin negotiations and contact the Legal Department for prior approval.

WE'RE CAREFUL TO COMPLY ...

Medicare Advantage and Part D (MA-PD)

To help protect Medicare beneficiaries and resources:

- Complete all MA-PD training requirements.
- Know and follow our policies and procedures.
- Regularly attest to reviewing and understanding these requirements.
- Make sure those who administer or deliver MA-PD benefits are free from [conflicts of interest](#).

False Claims Act

To prevent [improper payments](#) to (or from) the federal government:

- Follow all laws and policies for billing and reimbursement.

NEVER:

- Knowingly present a false claim for payment or approval.
- Make, use, or help make a false record or statement regarding a claim.
- Overcharge the federal government for any goods or services.

Government Program Exclusions

To keep federal funds from going to entities that are prohibited from participating in federal programs:

- Follow our procedures and screenings to know which providers, suppliers, or individuals have been excluded or sanctioned by the Office of Inspector General (OIG) or the Government Services Administration (GSA).
- Never hire or contract with a person or entity if they have been excluded from participating in Medicare or convicted of healthcare fraud.

What If?



Q. I have been contacted by a medical practice that has been a Blue KC Medicare provider for a number of years but has recently been added to the exclusion list. They are asking if we can allow them to stay in our network since they have been with us without issue for so long. Can we?

A. No, we can't. Their past record with us doesn't matter in this case. We are prohibited from hiring or continuing to contract with any individual or provider that has been added to the OIG exclusion list.

Find Out More



[Exclusion Screening Policy](#)

PARTNER RESPONSIBLY WITH THIRD PARTIES

Our business is built on strong partnerships and ethical connections. By acting fairly and honestly in every relationship, we weave trust and integrity into all we do for Blue KC and our community.

Show You Care

Choose fairly. If you help select our business partners, check their record and reputation to ensure they uphold the law and do business with integrity. Also keep personal [bias](#) out of your decision-making. Evaluate business partners based on their record and reputation as well as Blue KC's needs.

Deal fairly. If you interact with our business partners:

- Hold yourself and our business partners to the same high standards. Clearly document all transactions and never ask others to do anything that could violate our Code, policies, or the law.
- Protect our business partners' [confidential information and intellectual property](#) and ask them to protect ours.
- Monitor business partners' work to make sure they're fulfilling their commitments and reflecting our values. If you see possible misconduct, [report it](#) immediately.
- Never try to influence a business partner or allow yourself to be influenced by an inappropriate offer. And remember, stricter rules apply with healthcare professionals and [government officials](#). See [Follow Gift and Entertainment Rules](#) and [Prevent Bribery and Corruption](#) to learn more.

Who Are Our Business Partners?

They include:

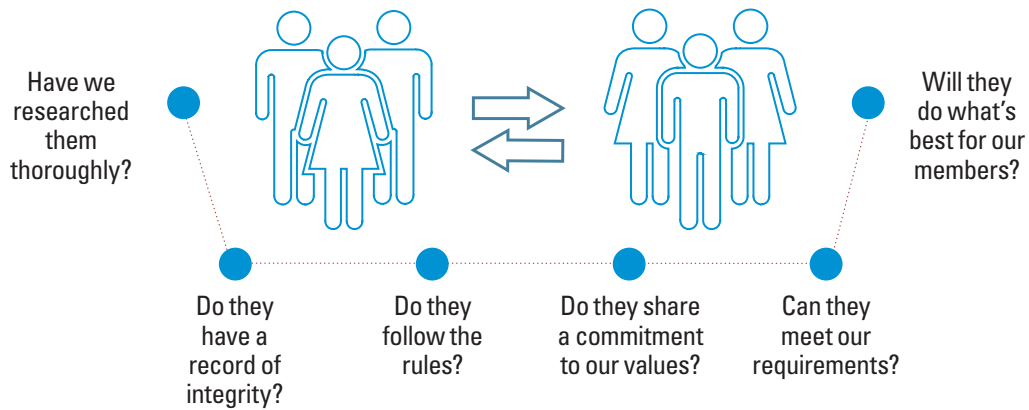
- | | |
|-------------------------|------------------|
| • Providers | • Consultants |
| • Vendors/
Suppliers | • Contractors |
| • Service
providers | • Subcontractors |
| | • Brokers |

Serve members with integrity. When interacting with our members, give them your best. Be honest and helpful, always following the rules that apply and protecting their [personal information](#). Never pressure them or mislead them. (Remember, giving false information to our customers violates the law and our policies.)



Integrity Check

Is this partnership good for Blue KC? Ask yourself:



If you can't answer "yes" to each question, this partner may not be a good fit for Blue KC.

What If?



- Q.** As part of my role, I've identified a vendor, and I think Blue KC could realize cost savings if we partnered with them. What should I do?
- A.** If you have questions about a new partnership you are considering, contact Third Party Risk Management. They can conduct a preliminary review of the organization before you start any selection and contracting processes.

Find Out More



[Third Party Risk Management Policy](#)



FOLLOW GIFT AND ENTERTAINMENT RULES

We all like to show thanks from time to time, but overly generous, frequent offers can lead to accusations of bribery. To protect our reputation and relationships, we never accept or offer anything improper.

Show You Care

Think hard about every offer. Before exchanging gifts, entertainment, or other offers – whether it involves members, customers, or third parties – make sure it doesn't come with hidden expectations or pressure. Avoid any offer that looks like it's intended to influence someone's decision-making or give the appearance of influence. It could be a bribe.

Gifts are ... anything of value given with the intention of letting the recipient use it however and whenever they want (such as tickets, goods, prizes, or travel when the giver doesn't attend).

Entertainment is ... an event hosted by the giver where both parties attend, such as meals, sporting events, and golf outings.

Follow our rules and theirs. Blue KC sets out specific rules around gifts and entertainment. You must know and follow them, along with the rules of the parties you're dealing with. While we permit small offers for legitimate business purposes, we don't permit offers where there's an expectation of something in return. If it's not appropriate, don't offer or accept it. Remember, the rules for healthcare professionals, government officials, and organized labor are more restrictive, so know what's required. If you have questions about any rule, contact [Corporate Compliance](#).

Get proper disclosures and approvals.

Remember, we expect you to disclose in advance any gifts and entertainment (other than business meals) offered or accepted. Also seek approval before offering or accepting anything above our value limits. Reach out to [Corporate Compliance](#) for help.

WHEN IT'S APPROPRIATE TO OFFER OR ACCEPT:

- ☒ Customary, legal, infrequent, and aligned with our Code and policies
- ☒ Reasonable in value (\$100 or less – and not more than \$200 a year with the same entity)
- ☒ Given for legitimate business purposes
- ☒ Disclosed to [Corporate Compliance](#) and prior approval received if over \$100
- ☒ Non-cash gifts or reasonable meals or entertainment where both parties attend
- ☒ Honoraria (compensation for presenting to an outside group) if it meets our standards
- ☒ Meets federal laws for members of organized labor

WHEN IT'S INAPPROPRIATE TO OFFER OR ACCEPT:

- ☒ Illegal and violates Blue KC's policies (or the other party's policies)
- ☒ Cash or a cash equivalent (such as gift cards, checks, or gift certificates)
- ☒ More than reasonable in value and frequency
- ☒ Not properly approved or disclosed
- ☒ Offered by current or potential vendors to someone involved in vendor selection (including improper prizes)
- ☒ Offered to pressure or obligate someone or influence their decisions
- ☒ Payment of travel expenses by a third party

Use special care with government officials.

Additional rules and policies apply when government officials are involved. Be sure to understand and follow them carefully and use care in your interactions. In general, never offer a government official anything of any value without proper approval, and make sure our third parties do the same. See [Prevent Bribery and Corruption](#) and [Be a Good Government Partner](#) to learn more. Officials may include:

- Government employees
- Brokers selling government business
- Members under government programs
- Customers who are government entities
- Providers who service members under government programs
- Vendors who support Blue KC's government business

What If?



Q. I have worked for a number of years with a vendor. My contact there has invited me to attend an industry conference and wants to pay for my conference and travel expenses. Since this is for legitimate Blue KC business, may I accept?

A. No, you may not fully accept their offer. Even though this is legitimate, this must be reported in advance for review. Blue KC policy allows for full or partial coverage of conference fees, and travel expenses cannot be covered to ensure they cannot be viewed as extravagant or risky unless it's specifically spelled out in our contract. Blue KC will pay for any travel and lodging expenses you incur and will advise you on how to handle the conference fees.

Q. I received a ticket to the Chiefs game from a supplier at the end of the year to thank us for our business this year. The supplier has offered to give me one ticket plus a parking pass. Is it OK to accept it?

A. Possibly, but you will need to [report it](#) in advance. Depending on several circumstances (i.e., current contract negotiations, if they will be accompanying you to the game, other gifts offered to you, etc.) you may be able to accept the ticket. Once submitted, your request will be reviewed, and you will be advised on how to handle the offer based on the specifics of your situation.

Find Out More

[Gift and Entertainment Policy](#)



KEEP ACCURATE RECORDS

Blue KC is committed to preserving truth and integrity in every business record. When our records are reliable, so are we. They help us build trust, see our progress and plan for our Company's future.

Show You Care

Be honest and transparent. Our Company, customers, and others need to trust our records at all times. Help ensure they accurately reflect every transaction and decision. Remember:

- Whenever you contribute to a Blue KC record (even the smallest), be thorough and accurate.
- Never alter records or make a false, misleading, or incomplete entry, even if someone senior to you requests it. Doing so can lead to civil or criminal penalties for you and Blue KC.
- If you're aware of an error, communicate about it and take proper steps to correct it.
- Never do anything to interfere with the integrity of an audit, review, or investigation.

Know and follow the rules. To ensure that our records are accurate, timely, and transparent, follow all applicable laws, policies, and generally accepted accounting principles in every entry, no exceptions.

Speak up. If you are aware of (or even suspect) suspicious activity related to our records, speak up to [Corporate Compliance](#) or the [Compliance Hotline](#) immediately so we can address it. We also expect you to cooperate fully with any audits or investigations to prevent fraud and protect our reputation.

Manage records responsibly. We handle a variety of important records and the rules may differ on how to manage them. Know the types of records you touch and follow our policies carefully on proper records handling, retention, and disposal. For questions, contact the Records and Information Management Team.

What Are Our Records?

They can include:

- Financial and performance information
- Regulatory attestations
- Information provided to auditors or government agencies
- Purchase orders and invoices
- Timesheets
- Expense reports
- Performance reviews
- Contracts, bids, and proposals
- Emails and other correspondence
- Claims data
- Member correspondence
- Requests for prior authorization

Use care with legal holds. If you receive notice that a record has a legal hold (it may be needed for a lawsuit or investigation), never alter, destroy, or conceal it without permission from the [Legal Department](#). Follow instructions and keep all supporting documentation, including emails or receipts.

Find Out More



[Records and Information Management Homepage](#)

[Records and Information Management Policy](#)

[Legal Hold Policy](#)

PREVENT BRIBERY AND CORRUPTION

When we work with integrity, we also succeed with integrity – without relying on bribery or corruption. This activity breaks the law, along with our reputation, and it has no place at Blue KC.

Show You Care

Know the law. Every business has a duty to follow the law, but our industry is highly regulated, making us subject to even more anti-corruption and anti-bribery laws. Learn how these laws apply to you, wherever your work takes you. If any law is unclear or if laws seem to conflict, contact the [Legal Department](#).

Interact ethically. Remember, bribes often begin with improper interactions. As you work with members, third parties, or others, always follow our policies and Core Values. That includes never making or accepting inappropriate offers of [gifts or entertainment](#) and avoiding any offer that could look like a bribe. Hold our third parties to the same high standard. Use special care with [government officials](#), as even stricter rules apply.

Is It OK?

[Report It](#)

You are our first line of defense. If you are unsure about a situation, encounter a situation or offer that may appear inappropriate [report it](#) or reach out to [Corporate Compliance](#) for help.

If you can't answer "yes" to each question, stop and ask for help.

Ask yourself, "Does the offer ..."

- Comply with applicable laws?
- Follow Blue KC's policies?
- Follow the other party's policies?

And have I ...

- Gotten pre-approval?
- Documented the offer properly?

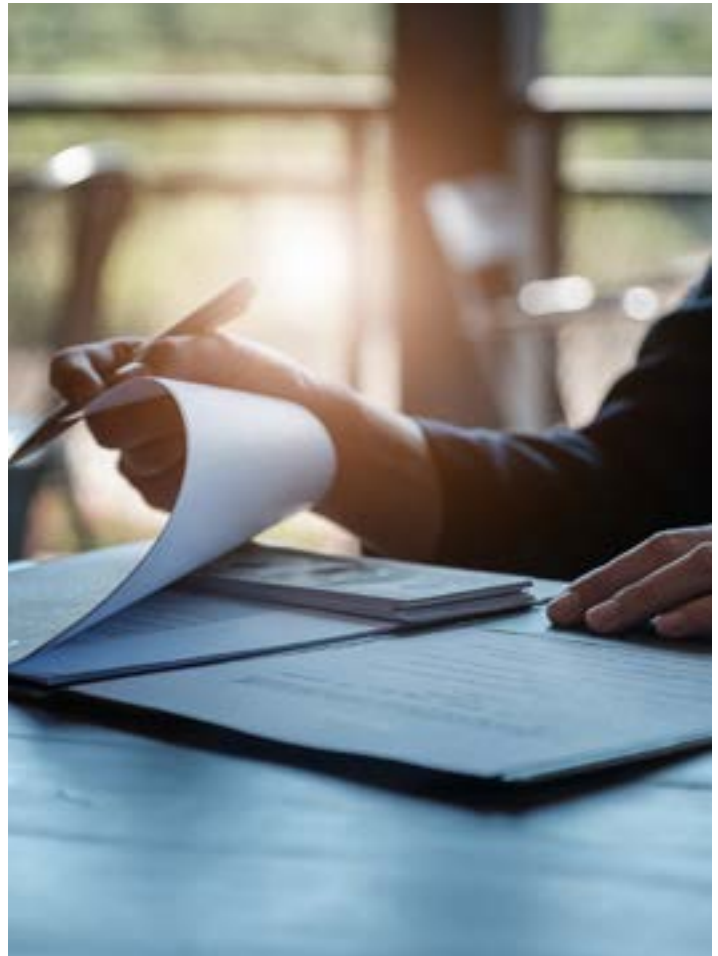
RECOGNIZING BRIBES

Bribes Are ...	They Can Include ...	They Can Involve ...
Anything of value (usually a payment or gift) offered with the intent of influencing someone's actions or decisions to benefit the giver.	<ul style="list-style-type: none"> • Cash, credits, or cash equivalents • Expensive gifts, meals, trips, or entertainment • Personal favors • Free goods or services • Offers to current or prospective customers to enroll in our services • Tickets or passes • Debt forgiveness • Personal loans or special discounts • Charitable or political contributions 	<p>Kickbacks – Giving something of value in exchange for the sale of goods or services, which is prohibited by the Federal Anti-Kickback statute and other bribery laws.</p> <p>Facilitation payments – Small payments made to speed up routine government services.</p>

Find Out More



[Disclosure of Gifts, Honoraria and Entertainment Policy](#)



SUPPORT BEST BUSINESS PRACTICES

We know competition makes us better. We also believe in competing fairly, always following the law, and maintaining a marketplace where everyone is welcome to participate.

Show You Care

Be fair, legal, and ethical. No matter how tough competition gets, we never rely on unfair or illegal practices to get ahead. To compete legally and ethically, know and follow the antitrust and competition laws that apply to us. While these laws may differ around the world, violating them can lead to serious consequences for anyone involved. Contact the [Legal Department, Corporate Compliance](#) if you're unsure about any requirement.

At Blue KC, we believe in competing based on:

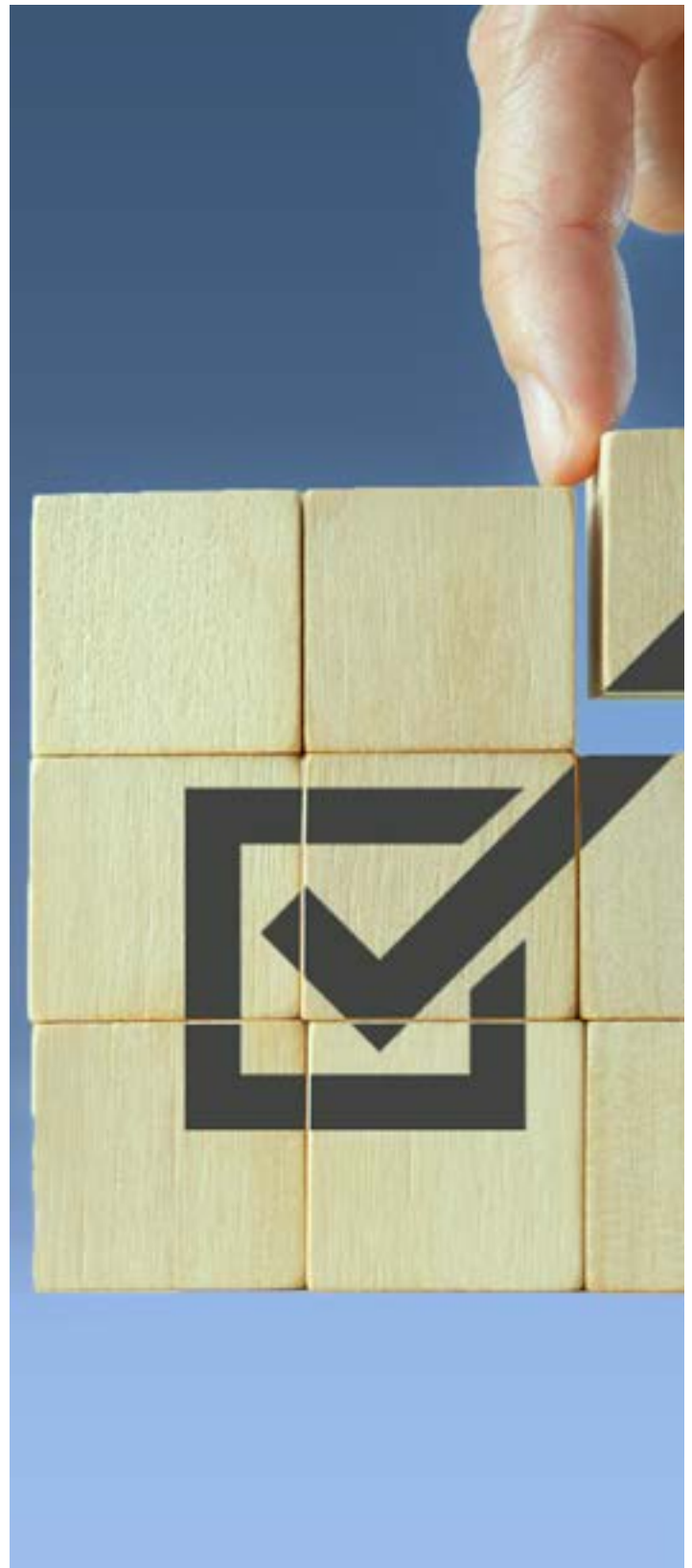
- Service
- Quality
- Value

When Is a Conversation NOT OK?

If it involves discussions of:

- Holding ("fixing") or raising prices
- Passing up or colluding on a bid
- Making sale or purchase arrangements
- Allocating markets or customers
- Rigging the outcome of a competitive bid
- Boycotting vendors or others
- Restricting licensing agreements or customers' choices
- Bundling goods or services

Are you involved in a conversation like this?
Tell the people involved it's inappropriate.
Then notify the [Legal Department](#) immediately.



Watch your interactions. If you ever deal with Blue KC's competitors, customers, third parties, or other Blue Plans, focus on being fair and ethical.

- Follow our procurement policies and processes when purchasing goods or services.
- Be careful in conversations at industry conferences and trade association meetings.
- Never even hint at an agreement that could give Blue KC an unfair advantage or restrict competition.
- If you promote Blue KC, never make false claims or comparisons to the competition.

Research the competition ethically. When learning about the competition, do so legally. Only use publicly available information, such as online articles, news sites, and industry journals. Never accept or seek illegally sourced information, such as [confidential or intellectual property](#) gathered from a former employee or anyone who might be violating a non-disclosure agreement.

What If?



- Q.** I got into a conversation with some competitors at a trade show who were discussing a “united front” against doing business with a particular vendor. I only listened to the conversation and tried to discourage them. Was that OK?
- A.** No, it wasn't. You heard the conversation turn to making plans for a group boycott of this vendor, which violates our policies and the law. Even though you meant well, you shouldn't have been a part of the conversation. Report what happened immediately.

Find Out More



[Strategic Sourcing Requirements for Commercial Vendors Policy](#)



PREVENT FRAUD, WASTE, AND ABUSE

We are committed to keeping fraud, waste, and abuse (FWA) out of Blue KC's business. By following our formal FWA Plan, we detect and correct this activity and maintain the integrity of the healthcare system.

Show You Care

Know what to look for. Our workforce training and education resources provide practical information on how to recognize and report acts of FWA. Make sure you have the information you need to do the right thing by completing all required training in a timely manner. Keep in mind that the daily decisions you make impact Blue KC and the people who place their trust in us.

Be passionate about being accurate.

We have controls in place to help us meet our federal healthcare program requirements, including those related to billing laws and regulations. Always follow our policies, procedures, and internal systems when processing claims for payment under federal and state healthcare programs. Be alert to ongoing risk assessments, data mining, monitoring, and investigations performed by our [Special Investigations Unit \(SIU\)](#).

If you suspect something, say something.

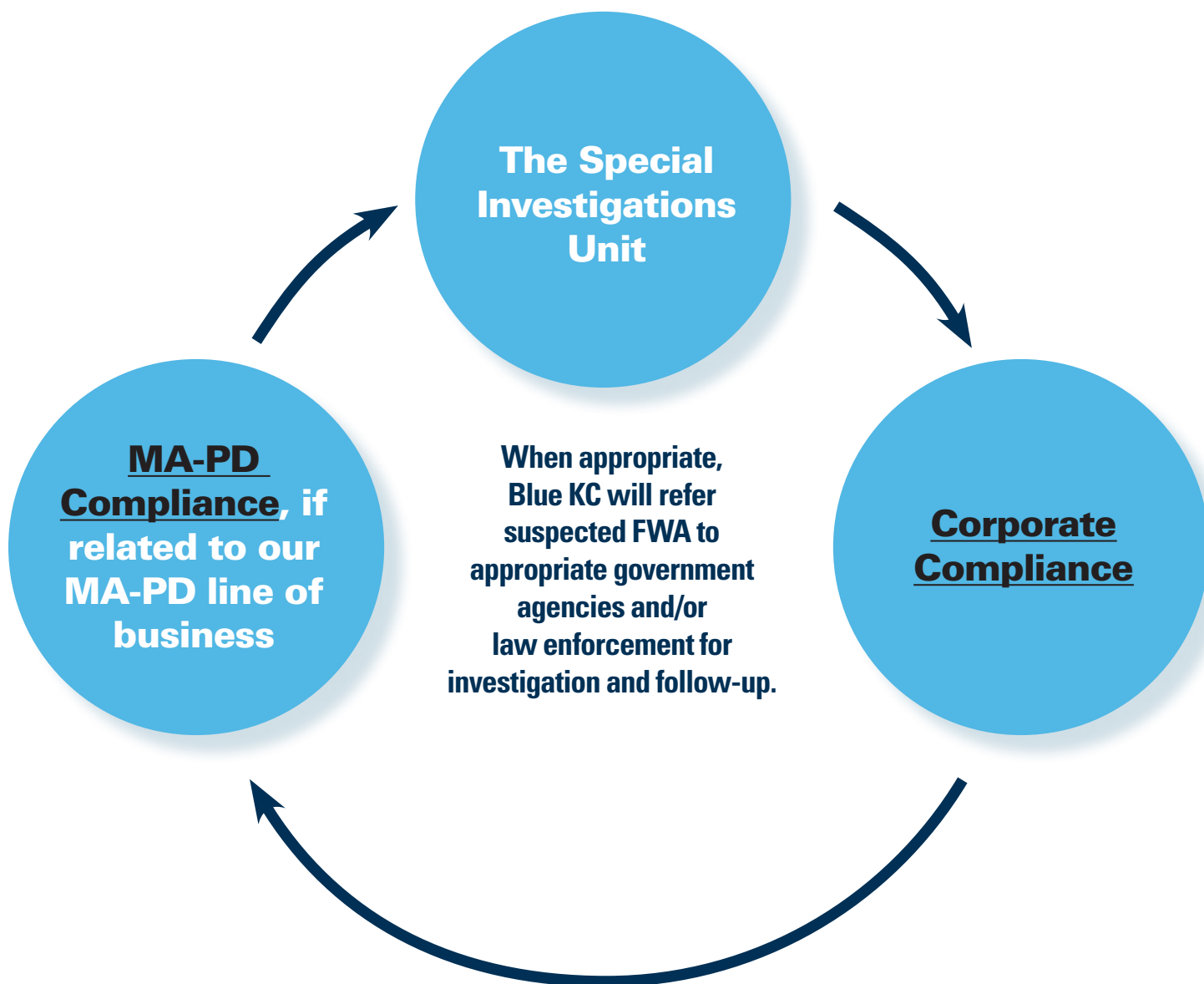
Speak up if you see or suspect a false or fraudulent claim was submitted for payment or if you see any conduct that doesn't align with our practices. This could involve a coworker, a healthcare provider, a member, a business partner, or other third party.

What Does "Fraud, Waste, and Abuse" Mean?

- **Fraud** is intentionally deceiving someone or misrepresenting information to gain an unauthorized payment or benefit. Example: Billing for services never provided.
- **Waste** is about mismanaging or misusing resources. Example: Providing services that aren't medically necessary.
- **Abuse** involves a questionable practice that's inconsistent with accepted medical or business policies. Example: Providing services that don't match the provider's specialty or the member's condition.



Report FWA Concerns To ...



Find Out More



[Fraud and Abuse Detection, Reporting, and Investigation Policy](#)

[Self Disclosure of Compliance Findings Policy](#)

[Fraud Alerts \(MA-PD\)](#)

[Fraud, Waste, and Abuse \(MA-PD\)](#)



ENSURE EXCELLENCE

Meeting our contractual obligations and quality standards is part of who we are, who we serve, and how we operate. It's one of the ways we put our **Core Value of Excellence** into practice every day.

Show You Care

Honor our contracts. Be sure you know and comply with what's contractually required (see [Be a Good Government Partner](#) and [Partner Responsibly With Third Parties](#)). Help members understand our contract with them and their certificate. Also ensure we honor our commitments and obligations to them. Ask for guidance if anything is unclear.

Follow our processes. Our internal procedures are designed to deliver a consistent, positive customer experience (both internal and external). If you have a question about the way something is done, or if you have suggestions for how something can be done better, speak to your manager. Continuous improvement is part of everyone's job.

Be your best. Exceptional customer service isn't just a good idea, it's a differentiator. A positive interaction with you can influence the way a member views our whole Company. The reverse is true as well. Do your part to make life better for our members and enhance our reputation in the marketplace. Ensure we honor our commitments as a company and representatives of Blue KC. Remember to make it easy!

Tips for Communicating Effectively

- Listen and be both respectful and empathetic.
- Speak clearly.
- Repeat back what's being said, and ask clarifying questions.
- Promptly address concerns and strive to minimize wait time.



What If?



Q. A member contacts you and is very upset about not finding the information they need on our website. What can you do to defuse the situation?

A. Apologize for the member's frustration and work quickly to answer their question. Maintain a positive tone, thank them for calling, and ask if there's any additional assistance you can provide before ending the call.

Q. What if I get a question or member complaint that I am not sure how to manage?

A. It is difficult to know how to prepare for all situations, but resources are available to you. Access Blue Help or your Departmental SOP repository to assist with how to best manage a wide array of situations.

ENSURE ETHICAL POLITICAL PARTICIPATION

We believe everyone should have a voice in our political process. When we do get involved, as a company or as individuals, we do so with care and respect, keeping our Core Values in mind.

Show You Care

Participate independently. Your participation in political activities should be personal. That means:

- Contribute in your own name, using your own time and resources.
- Never make statements on Blue KC's behalf.
- Never use Blue KC's name, funds, or resources (such as computers and printers) without prior approval from the [Legal Department](#) or the Vice President of Government Relations.

Participate legally and ethically. While we support your personal political activities, make sure they remain legal and aligned with our policies, and they don't interfere with your obligations to Blue KC. Follow any laws that apply, including those related to lobbying.

- Don't lobby on our behalf. Our industry is highly regulated, so get approval before engaging in any lobbying activities or contributions involving our government partners.
- Be aware, lobbying includes political activities, such as:
 - Attempts to influence legislative action
 - Communications with legislators, regulators, and other government officials
 - The exchange of anything of value (like [gifts or entertainment](#)) with government officials

How Do I Participate With Respect?

Remember, political participation is a personal choice, so respect your coworkers' right to:

- Hold their own opinions
- Support causes and candidates of their choice

And remember:

- Never share or post political materials or messages in the workplace or with your coworkers.
- Never pressure coworkers to support a candidate or cause.
- If you choose to run for political office, talk to [Corporate Compliance](#) first so you can avoid a conflict of interest.

Find Out More

[Employee Handbook](#)



What If?



Q. I support a local candidate who openly supports Blue KC and the work we do. Would it be OK for me to speak out at this candidate's campaign event and identify myself as a Blue KC employee?

A. No, it wouldn't. While we support your right to help your preferred candidates, Blue KC doesn't endorse or contribute to political campaigns or causes, so it wouldn't be appropriate for you to use your position as an employee or speak on our behalf for this person's campaign.

GET SUPPORT

Thank you for reading Blue KC's Code of Conduct and learning what makes us a lifelong partner in health to our community. We hope you continue to use this Code of Conduct as a resource and reference. By embracing our Code, you're helping us build a better, more ethical company and a workforce that's truly Guided by Integrity. If you have questions, reach out to one of these Blue KC resources:

ISSUES OR CONCERNS	CONTACT
To ask questions or speak up about possible misconduct, ethical concerns, or policy violations	<p>Corporate Compliance: Email CorporateCompliance@BlueKC.com Report a Concern</p> <p>Or, you may report anonymously to: The Compliance Hotline: 1-844-227-1790</p> <p>While contacting the above resources is preferable in most situations, if you deem it appropriate, you also have the option to directly contact the Chairman of the Audit Committee of the Board of Directors. Audit Committee Hotline 1-855-461-2767 (anonymously if desired).</p>
For Human Resources	Contact the Human Resources Department Email Human_Resources@BlueKC.com
For Medicare Advantage and Part D Compliance	Contact the MA Compliance Officer Email MACompliance@BlueKC.com Visit the MA Compliance Homepage
For legal questions	Contact the Legal Department Email Legal@BlueKC.com
For information security	Contact the Information Security Team Email _IS_Security@BlueKC.com
For privacy	Contact the Privacy Officer Email Privacy@BlueKC.com Call 816-395-3784
For government-related questions	RegulatoryCompliance@BlueKC.com
For fraud, waste, and abuse concerns	Email _SIU@BlueKC.com Call 816-395-3151
For questions about volunteering	Community_Relations@BlueKC.com
For personal safety or physical security	816-395-2995
For facility concerns	Facilities@BlueKC.com

We support our employees' right to speak out publicly about matters of public concern and to participate in concerted activities and communications related to terms and conditions of employment. Nothing in any section of our Code or in any of our policies is intended to limit or interfere with that right. That includes activities protected under Section 7 of the U.S. National Labor Relations Act, such as discussions related to wages, hours, working conditions, health hazards and safety issues. The Code is also not intended as a contract or guarantee of employment.



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