



Code of Conduct

Leading with integrity

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Integrity in everything we do

Blue Shield of California is a nonprofit health plan with a mission to help ensure all Californians have access to high-quality healthcare at a sustainably affordable price. We are innovating to improve our products and services, lower costs, improve quality, and enhance the member and physician experience. We continue to drive value for our members with our ambitious plan to transform the healthcare system. We are committed to addressing health disparities and integrating health equity in all we do.

We are a team of extraordinary individuals dedicated to providing the highest quality health coverage and service to our members. To do this and remain #1 against our competitors in reputation, each of us must live up to that reputation by showing integrity in every action and decision we make. Our Code of Conduct is designed to guide us. It is our playbook for making good choices for our organization and everyone we serve – choices that make us stronger, reflect our values, and show the world what we stand for.



The Code walks us through common situations and helps us handle them ethically. It also empowers us to stand for what is right – with our core values always in mind. When we need help navigating difficult decisions, the Code points us to additional Blue Shield resources. That is how we best care for our members: one team, with one mission, holding ourselves and each other accountable.

Thank you for your ongoing commitment to our Code and the passion and integrity you bring to your daily work. With your help, we'll never stop leading with integrity, giving our members our best, and building an organization and culture we can be proud to call our own.

Paul Markovich
President and Chief Executive Officer

Bring our values to life

While our culture forms the framework for the way we work at Blue Shield, our values are the essence of who we are and what we believe. When we embrace our values, they come to life in our daily actions and help us do what is right.

Our Mission To ensure that all Californians have access to high-quality healthcare at an affordable price.

Our Values



Human

- We connect with and treat everyone we interact with – inside and outside the company – with dignity and respect.
- We strive to be our authentic selves, listening and communicating effectively, and showing empathy toward others by walking in their shoes.
- We are part of a high-performing team and adopt a learning mindset, keeping our members at the center of everything we do to create a personal, high-quality experience.



Honest

- We hold ourselves to the highest ethical and integrity standards. We build trust by doing what we say we are going to do and by acknowledging and correcting where we fall short.
- We are open and transparent, getting sustainable results the right way and helping others make better, more informed decisions.



Courageous

- We are industry leaders, thinking creatively and critically, and constantly innovating to transform healthcare.
- We stand up for what we believe in and are committed to the hard work necessary to achieve our ambitious goals.
- We continuously learn by stepping out of our comfort zones to conquer our fears, lead change, and challenge the status quo.

Get started

Leading with integrity is about more than following the rules. It is about internalizing our values so they become second nature. Blue Shield gives us the support and the tools we need to succeed.

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Understand our Corporate Compliance and Ethics Program

We are all responsible to those we serve, to each other, and to those who require us to comply with complex laws and regulations. Blue Shield's Corporate Compliance and Ethics Program ("the Program") is designed to:

- Help us comply with the rules that apply to us
- Educate us about ethical issues
- Promote a culture of integrity
- Give us avenues to ask questions
- Provide options for speaking up about concerns without fear of retaliation

While compliance is something we are responsible for as a company, it is something we each "own" as individuals and demonstrate in our actions.




Can we talk?

One of the policies in my business unit seems to differ from Blue Shield's policies. Which one should I follow?


Sometimes our business units may adopt policies or procedures that differ from company policies. They may even be more strict. If policies ever conflict with each other, always follow the stricter requirement. If policies ever conflict with the law, always follow the law. We expect our business partners to do the same.

How our Program works

Our Chief Risk and Compliance Officer...


 **Manages our Corporate Compliance and Ethics Program**



 **Works closely with:**

- Legal professionals
- Senior leaders
- Other Blue Shield personnel



 **Updates our Board of Directors on how we are doing**



Our Code of Conduct is the foundation on which the Program stands.



Know our Code and our Cornerstones

It is not enough to say we do what is right. We need to make sure we are all following the same set of rules. That is where our Code of Conduct and Cornerstones play a vital role.

Our Code is... the written expression of our expectations, not only requiring compliance with the law and our policies, but also helping us keep sight of our values and translate them into everyday actions.



Our Cornerstones are... the four categories around which we organize our Code. Each Cornerstone highlights a different aspect of how we conduct our daily business:



Cornerstone 1:

Using the Code as our guide and asking for help



Cornerstone 2:

Providing a safe and supportive environment for our workforce members



Cornerstone 3:

Promoting the best interests of Blue Shield and our members



Cornerstone 4:

Conducting business in a fair and honest manner

Uphold our responsibilities

Each of us, every day, makes an impact at Blue Shield. The actions we take as individuals show the world who we are as a company. That is why we take our responsibilities seriously to protect our company, our customers and members, and our good name.

It is up to you

If you are an employee:



Live and lead by our values – Let our values become a part of who you are and inspire you to work honestly and ethically.



Commit to following the rules – We follow federal, state, and local laws and regulations; federal healthcare program requirements; licensing requirements; and requirements of the Centers for Medicare & Medicaid Services. Our Code and our policies and procedures will help you be compliant. Know them, follow them, and [ask questions](#) if anything is unclear.



Speak up – Do not ignore misconduct. If you suspect a violation of our Code, policies, or the law, you are required to [speak up](#) immediately.



Be part of the solution – If you are asked to help with an internal or external investigation, audit, or inquiry be cooperative and honest.

Special requirements

Being a member of Blue Cross Blue Shield Association (BCBSA) comes with the added responsibility of upholding BCBSA's standards for:

- Protecting our brand
- Marketing our products
- Reporting misconduct
- Reporting financial performance
- Monitoring and disclosures

To learn about these and other requirements, visit the [BCBSA's Blue web portal website](#).

If you are a manager:



Be a role model – Lead with integrity every day, in every action. Maintain the highest standards and expect the same from your team, always staying true to our Code and our values.



Promote the Code – Keep the Code top-of-mind by referring to it often. Also make sure everyone you lead knows our Code and completes required training, including your Blue Shield employees, leased workers, contractors, and business partners.



Open your door – Make sure your team knows you are there to listen and help. Be able to answer their questions (or find answers) and give them confidence to speak up.



Take action – If you are aware of possible misconduct, you are required to report it – do not delay. [Speak up](#) to Corporate Compliance & Ethics or other Blue Shield resources.

Commit to our Cornerstones

Leading with integrity is a journey that begins with our Cornerstones. When you embrace them, you commit to the Blue Shield way of working.



Cornerstone 1:

Using the Code as our guide and asking for help



Cornerstone 2:

Providing a safe and supportive environment for our workforce members



Cornerstone 3:

Promoting the best interests of Blue Shield and our members



Cornerstone 4:

Conducting business in a fair and honest manner

1

Using the Code as our guide and asking for help

Every journey is full of unexpected turns. Our journey together is no different. We all need help along the way to stay on course. We rely on our Code and our company to show us the way.

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Follow the Code

At Blue Shield, we recognize that to lead with integrity, we must do what is right for our members and our company in every action, every transaction, every conversation. We succeed when we follow our Code.

The Code is your best resource for navigating common ethical situations, but given how complex our work can be, the Code cannot cover every possible situation you might face. This Code provides general direction on a broad range of issues; however, laws and regulations may exist that have specific requirements for your job. Blue Shield of California has adopted policies and procedures that apply to your job and how you conduct yourself at work. It is your responsibility to know which policies apply to you and make sure that you comply with them.

The Code applies to...

Each of us – everyone who represents Blue Shield in any way. That includes:

- All full- and part-time employees of Blue Shield and Blue Shield affiliates (including Promise Health Plan, the Blue Shield Foundation, and Blue Shield of California Life Insurance Company)
- Contractors
- Members of our Board of Directors
- Business partners
- Anyone else working on our behalf

We are all responsible for upholding the Code and our company policies. Begin by reading the Code carefully and refer to it whenever you have questions.

A Code for business partners

We are honored to do business with suppliers that support our mission, operate fairly and ethically, promote diversity and inclusion, and take care of the environment. Our [Supplier Code of Conduct](#) upholds the highest standards of ethical conduct and management practices and includes such topics as:

- Workplace Standards
- Ethical Behavior
- Privacy and Compliance
- Supplier Diversity
- Environmental Sustainability

Our customers include...

Members, insureds, subscribers, employer groups, patients, and prospective customers

Our business partners include...

Providers, suppliers, vendors, producers, consultants, contractors, subcontractors, and agents

Our employees include...

All employees, officers, Board members, and contingent workers, including leased (or employed by a staffing company) workers, independent contractors, and consultants

In case of violation...

We do not see our Code as a rule book. It is something we proudly uphold as our guide to integrity. When someone violates the Code, our policies, or the law, it harms us all – breaking the trust we have worked so hard to build. Any violations can lead to serious consequences, including disciplinary action, up to and including termination of employment, assignment, or contract. Violations of law can lead to more serious consequences, involving law enforcement, government agencies, and civil or criminal penalties.

Do we ever make exceptions?

There may be rare instances when we might waive a provision of our Code. Any requests for waivers must be submitted in writing to our Chief Risk and Compliance Officer or General Counsel. The request may also be required to be approved by an executive officer of Blue Shield or our Board of Directors and properly documented and disclosed, if required by law.

Keep in mind, laws and requirements often change. Blue Shield may modify the Code to respond to these or any other changes at any time, along with our policies, procedures, or conditions of employment. We will promptly communicate any changes or updates and explain why they are needed.

Make good decisions

Our daily decisions determine the direction Blue Shield takes. Choices grounded in integrity and a commitment to our values steer us toward a future where our company and our customers continue to thrive.

If you are unsure whether a particular decision is the right one, ask yourself:



Is this action legal?



Does it align with our values?



Does it align with our Code and policies?



Does this help us build trust?



Do I have enough information to make a good choice?



Would I be proud to share this action with others?

Make sure you can answer YES to every question. If you can, it is probably OK to proceed. If even one answer is NO or MAYBE, stop and [ask for help](#).



Speak up

If we stay silent about misconduct at Blue Shield, the results can be devastating – to us and everyone we serve. Our Code shows us the kind of conduct to report, but to address misconduct, we need to know about it first. That is where you play a critical role – not only by doing what is right, but by speaking up for what is right.

How do I speak up?

We know speaking up is not always easy, but it is essential. Blue Shield does all we can to make you feel confident and secure, knowing that you will be heard. All we ask is that you report honestly and in good faith.

We offer a variety of ways to speak up.

Contact either:

- Your manager or another manager
- Human Resources
- Corporate Compliance & Ethics – to submit a Compliance Inquiry Report
- Blue Shield Law
- Internal Audit
- Corporate Finance
- Senior Leadership



Lead with integrity

Speak up whenever...

- You are not sure what to do.
- You believe someone may be violating our Code, policies, or the law.
- You think you may be involved in misconduct.

Remember, speaking up is not optional – it is your responsibility.



Or, if you prefer, you also may contact:

Blue Shield's Compliance Hotline



By phone
Toll-free at **1-855-296-9083**



By email
CorpComp@blueshieldca.com



Or online
bscomplianceandethics.alertline.com

The Compliance Hotline is available 24 hours a day, 365 days a year and is operated by an independent third party. An operator or online form will help you document your concern and forward it to the appropriate resource at Blue Shield. Even though you have the option to remain anonymous, giving us your name helps us conduct a more effective and thorough investigation.

Speak up

What happens next?

- However you choose to speak up, we will take your report seriously, and we will not tolerate any retaliation against you.
- We will promptly investigate, if necessary, keeping your report as confidential as legally possible while protecting your rights and the rights of anyone involved.
- We may ask for your help with an internal or external investigation. If so, we expect you to cooperate honestly and completely.
- If we discover a violation of the Code, our policies, or the law, we will take appropriate action. And because investigations and outcomes are confidential, you may not be notified of all actions taken.

Could I face retaliation?

Short answer – no. Our values inspire us to hold each other to the highest standards and stand up for our beliefs. That means we are grateful – not spiteful – when someone speaks up in good faith with a concern or helps with an investigation. We will not tolerate retaliation of any kind, even if their report turns out to be unfounded. Retaliation is a serious violation of our Code and can lead to disciplinary action, even termination of employment.

Retaliation might look like:

- Threats of termination or other consequences
- Undeserved negative job reviews
- Creating a hostile work environment
- Pay reduction
- Demotion or reduced responsibilities
- Removal of opportunities
- Exclusion from activities

If you suspect retaliation of any kind or you believe you have experienced it after speaking up about a possible violation of our policies or the law, [report your concerns](#) immediately.



What if?

I have a concern I'd like to report, but I don't have all the details. If I'm wrong, I'm worried I might face retaliation. Does that mean I shouldn't speak up yet?

No, just the opposite. You shouldn't wait. It is not necessary to confirm the activity you are reporting or to do any investigating on your own. What is most important is that you speak up honestly and immediately. We will not stand for any retaliation against you.

A leader has instructed me to participate in something that I believe is both illegal and violates our policies. Should I proceed?

No, you shouldn't. No one – not even a leader – has the authority to ask you to do anything that violates our policies or the law. Report your concern and ask for guidance to make sure compliance remains a top priority in your daily work.



2

Providing a safe and supportive environment for our workforce members

Our work environment impacts everything – our morale, motivation, performance, and much more. That is why we cultivate a workplace that gives each person a sense of well-being and belonging.

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Promote diversity, equity, and inclusion

Blue Shield is powered by diverse employees – each individual contributing their unique talents, ideas, and perspectives. We welcome that diversity and work to maintain an inclusive and fulfilling environment.

Encouraging equity

Help ensure equal access. If you make employment decisions for Blue Shield, make sure every person has the same chance to contribute and thrive. That includes having access to the same work tools and resources for training and development.

Promote equal opportunity. Follow employment laws to the letter to ensure equity throughout our business. When interviewing applicants and hiring, promoting, and dismissing employees, make decisions based only on business requirements and a person’s skills and qualifications.

Ask for help. If you are ever unsure how a law or requirement applies to you, including our Affirmative Action Program, contact Human Resources or Corporate Compliance & Ethics.



Lead with integrity

Unconscious biases can skew your thinking and decisions. To check your actions for bias, ask yourself:

Am I relying on the same people for input?

Am I responding without listening?

Have I dismissed anyone’s input?

Am I excluding anyone from meetings or activities?

Any **YES** or **MAYBE** answers may be a warning sign of bias. Work to identify and minimize them.

Preventing discrimination

Practice fairness and respect. In your daily work, treat each individual fairly. Never discriminate against or favor anyone based on personal characteristics that are protected by law. These include:

- Race or color
- National origin or ancestry
- Religion or creed
- Gender expression, identity, or sexual orientation
- Age
- Marital status
- Pregnancy
- Disability or medical condition
- Veteran status

Be open and welcoming. Appreciate the unique qualities of each person. Invite everyone’s input and help them feel appreciated and included.

Take a stand. If you are aware of discrimination or disrespectful or unfair treatment anywhere in our organization, [speak up](#) about it immediately.



Can we talk?

I’m concerned that a job description we have posted might be discriminatory. Since it only affects applicants and not employees, does this matter?

Yes, it does. Discrimination can happen at any point in the employment process. We want to know about it if it is occurring. Help us follow the law and live up to our values by speaking up immediately.



Find out more

Employee Handbook: Equal Opportunity



Keep harassment out

Harassment takes a toll on all of us – on our relationships, our work, and ultimately, our business. It is up to each of us to keep our workplace safe and positive for everyone.

Be respectful in every interaction. You may interact with many different people each day: our colleagues, members, business partners, affiliates, and others. Base every interaction on respect – never let harassment, intimidation, bullying, or other harmful treatment play a part.

Learn to spot harassment. In whatever form it comes, harassment is never OK. It can involve physical, verbal, or sexual behavior that creates a hostile or negative work environment. Harassment can be subtle, even unintentional. If you observe harassment, report it.

Lead with integrity

Check to see if conduct might be harassment. It could be if it:

- Is unwanted
- Involves inappropriate physical contact or gestures
- Involves derogatory jokes, names, (or nicknames), comments, or intimidation
- Is perceived as offensive
- Involves offensive material
- Negatively impacts someone's work

What is sexual harassment?

It is a type of harassment that can involve:

- Employees or non-employees
- Anyone of any gender
- On- or off-site activities
- Unwelcome or repeated sexual advances
- Unwanted physical contact
- Sharing of sexual materials
- Sexual requests

Take a stand. If you see signs of harassment anywhere in our business or if you experience it yourself, do not ignore it. [Speak up](#) immediately and remember, we will not tolerate retaliation against you.

Watch your own behavior. Be aware of how your behavior affects others. Always remain professional and helpful.



Find out more

Employee Handbook: Harassment



Maintain a safe and healthy workplace

Our people give their best to care for Blue Shield’s members. Blue Shield, in turn, cares for our people by providing a safe and healthy place to work. Each of us has a responsibility to help keep it that way.

Know the rules, use the tools. Blue Shield sets out the health, safety, and environmental rules, procedures, and equipment we need to stay safe at work. Know our rules and follow them carefully – no shortcuts. Also take all required safety training and wear personal protective equipment when required.

Speak up for safety. If you are aware of any unsafe conditions, emergencies, injuries, or health, safety, or security threats, speak up immediately to Blue Shield’s Security Operations Center so we can take action.

When should I speak up?

When you are aware of anything that could cause harm, such as:

- Possible substance abuse
- Violations of safety rules or requirements
- Hazardous work conditions
- Weapons on company premises
- Unauthorized individuals in our facilities
- Verbal or physical threats
- Intentional damage to company or personal property

Be at your best. Blue Shield expects us to be fit and ready to work – not under the influence of alcohol or drugs (both illegal drugs and controlled substances). Being impaired could put yourself and others at risk.

Help keep violence out. Threats, acts of violence, or weapons, have no place at Blue Shield (including inside vehicles in our parking lots). Watch for and speak up immediately about these and any other signs of workplace violence if you see or experience them. Do not stay silent – someone could get hurt.



What if?

A coworker seems depressed lately but doesn’t want to talk about it. It’s a pretty significant personality change, but since this person hasn’t made threats or acted violently, should I keep this to myself?

No, you shouldn’t. Although there doesn’t seem to be a threat involved, we should be advised of the situation. Let your manager know right away. We might be able to offer resources for support before the problem gets worse.



Find out more

- Corporate Safety and Security Site
- Employee Handbook: Health and Safety



3

Promoting the best interests of Blue Shield and our members

By conducting our business and ourselves with integrity, we demonstrate our respect for our company and our stakeholders. We also build our reputation as an industry leader, worthy of the trust placed in us.

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Handle records with care

Behind Blue Shield’s business are countless records. When we manage every record responsibly, we can track our performance, meet our obligations, and make well-informed decisions for our company.

Ensuring accuracy and integrity

Highlight honesty and transparency. Our company, customers, stakeholders, and others trust that our records are reliable. Any time you contribute to a Blue Shield record, be accurate and thorough. Never make (or pressure others to make) a false or misleading entry – it can damage our reputation and lead to civil or criminal penalties.

Follow the rules. Be sure you know and follow the law, our policies, and generally accepted accounting principles without exception. When you do, you help ensure that every record and disclosure is timely, accurate, and transparent.

Speak up for accuracy. If you are aware of suspicious activity involving our records, [speak up](#) immediately. And if requested, cooperate fully with any audits or investigations. You could prevent fraud and protect the Blue Shield name.



What do our records include?

A few examples are:

- Expense reports
- Accounting records
- Purchase orders and invoices
- Timesheets
- Statements of benefits
- Performance reviews
- Contracts
- Bids and proposals
- Emails and other correspondence
- Claims data
- Appeals and grievances
- Member correspondence
- Prior authorization requests

Good records management

Focus on accuracy and accessibility. Whether it is a medical or business record, we need to store and handle them properly. Carefully follow our policy on proper handling, retention, and disposal of records.

Follow our retention rules. Never alter, destroy, or hide a record that has a legal hold or is needed for a lawsuit or investigation without permission from Blue Shield Law. Follow instructions if you receive a legal hold and keep all supporting documentation, including receipts or emails. Contact Blue Shield’s Records Management Team with any questions.



Find out more

- Employee Handbook
- Travel and Expense Reimbursement Policy
- Gifts and Entertainment
- Anti-corruption Policy
- Records Management Policy
- Records Retention Schedule
- Legal Hold Process

Lead with integrity

Check to make sure you NEVER:

- Intentionally create a false record
- Alter records or fail to make correct entries
- Guess at an answer in a document
- Omit or conceal relevant information
- Create secret “slush” funds for any purpose

Prevent fraud, waste, and abuse


We know that funds lost to fraud, waste, and abuse are a loss to the healthcare system, Blue Shield, and our members. That is why we work to fight and prevent this activity in all its forms.

Keep our mission in mind. Remember, we want to ensure that every Californian has access to high-quality healthcare at an affordable price. Acts of fraud, waste, and abuse challenge that mission and subject us to legal, financial, and reputational risks. Learn to identify this activity so you can help prevent it.

Follow the rules. Remember, Blue Shield establishes company-wide rules and guidelines to make sure payments and transactions are properly authorized and fully and accurately recorded. Know and follow our policies and the regulatory requirements that apply to us to prevent fraud, waste, and abuse.

[Ask questions](#) if any rule is unclear.

Speak up immediately. If you become aware of actual or suspected fraud, whether it involves a colleague, a healthcare provider, a member, a business partner, or any other party, we rely on you to help us detect and investigate it. Contact Blue Shield’s Special Investigations Unit (SIU), Medicare Compliance, Promise Health Plan Compliance or our toll-free [Fraud Hotline](#) right away.

 **Find out more**
Anti-corruption Policy
Employee Handbook

What should I watch for?

Fraud, waste, and abuse often involve false claims and can include:

- Submitting a claim for someone other than the member
- Billing for services, procedures, or supplies that have not been provided
- Providing services that are not medically necessary
- Forging a physician’s signature to obtain medicine or treatment
- Failure to provide supporting documentation
- Misrepresenting or manipulating information to bill for services that were not provided or are different than those provided



Protect our assets

Our assets, along with our people, keep Blue Shield’s business running and growing. It is up to each of us to understand the value of our assets, use them responsibly, and protect them from loss or harm.

Be a good steward. Blue Shield has invested a great deal in the assets we use to do our daily work, including physical and information assets and our brand and reputation. Regardless of your job or where you work, we trust you to use these resources legally, professionally, and in accordance with our policies.

Protect what is ours. Focus on good security. Follow our policies to prevent unauthorized access to our facilities, systems, and information. Treat our assets respectfully – never borrow, lend, or dispose of them without authorization, or use them for personal gain. Limit personal use – never use our assets to share inappropriate content, and do not let your use interfere with your work or violate our policies or the law.

What are Blue Shield’s assets?



Physical assets

The tangible things we can see and touch, including:

- Buildings
- Furniture
- Office equipment, tools, and vehicles
- Office supplies
- Blue Shield’s funds



Information systems

The devices, systems, and information that support our business, including:

- Computer systems and software
- Internet access
- Email, voicemail, and instant messaging
- Intranet sites
- Video/web conferencing, phones, and mobile devices
- Networks and databases
- Confidential, proprietary, and personal information



Our brand and reputation

The Blue Shield name, legacy, and what we stand for, represented by our:

- Interactions
- Decisions
- Quality of service
- Commitment to our mission and values
- Activities outside of work

Practice good cybersecurity. To prevent unauthorized access to our electronic and information assets, use our systems properly. Watch for potential cyberthreats and carefully follow our IT policies and cybersecurity rules, such as:

- Create strong passwords, update them regularly, and never share them.
- Never click on suspicious links or downloads.
- Only use hardware, software, and applications that are approved by Blue Shield.
- Do not access Blue Shield information on unsecured networks, such as public Wi-Fi (for example, a hotel, café, or other public venue network). Follow our policies to protect [confidential and proprietary information](#) as well as [personal information](#).
- Contact Information Security, Risk, and Operations (ISRO) if you see or suspect unauthorized access to our systems or data.
- Follow Blue Shield’s procedure to report suspicious emails. Reach out to Blue Shield’s Information Security, Risk, and Operations (ISRO) for more information.



Can we talk?

I used my work email to send a personal email to a friend. Could someone at Blue Shield read it?

Yes, they could. Our email systems are company property, and we may monitor and access them at any time, without notice. There is no expectation of privacy when using BSC systems for personal use. Never send messages or content that you would not feel comfortable with others seeing.



Find out more

Employee Handbook: Company Property
Information Security Policy

Secure confidential and proprietary information

One way we earn trust is by securing all the information we collect and create at Blue Shield. In so doing, we do not just prevent disclosure, we protect our reputation and our competitive edge.

Know what is confidential. Your job may put you in contact with information that is not available to the public. That information might relate to Blue Shield, our customers, or our business partners, and exposing it could cause harm. That is why we rely on you to recognize what is confidential and protect it, even after your employment ends. It includes:

Confidential information...

Nonpublic information that is vitally important to our business, such as:

- Research
- Acquisition or investment plans
- Projected sales or earnings
- Employee, customer, or business partner lists
- Contracts

Proprietary information, (or intellectual property)...

Anything created – the ideas and information that set a company apart, such as:

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

Handle with care. Only use confidential and proprietary information that you are authorized to access, and only use the minimum amount you need to do your job. Handle this information legally and in accordance with our policies, including our Records Management Policy. Do not share it with anyone who is not authorized, whether online or in public. If it is not clear to you if information is confidential, treat it like it is.

Protect others' information, too. Keep in mind, the same rules apply to protecting confidential and proprietary information belonging to others. Whether that information belongs to our business partners, customers, or other organizations, follow all laws, licenses, and policies that apply before using someone's intellectual property. Ask Blue Shield Law if you need guidance.

Use special care with personal information and personal health information. Blue Shield collects a great deal of individually identifiable personal information ("IPI") and protected health information ("PHI") that belongs to our members, patients, customers, business partners, and employees. Follow data privacy laws carefully as well as storage guidelines (if any) to protect it. To learn more, see [Preserve privacy](#).



It could happen

A member of my team came to me in confidence to explain a health condition that might have a temporary effect on their performance. Should I mention this to the other members of my team so they can understand and possibly help out?

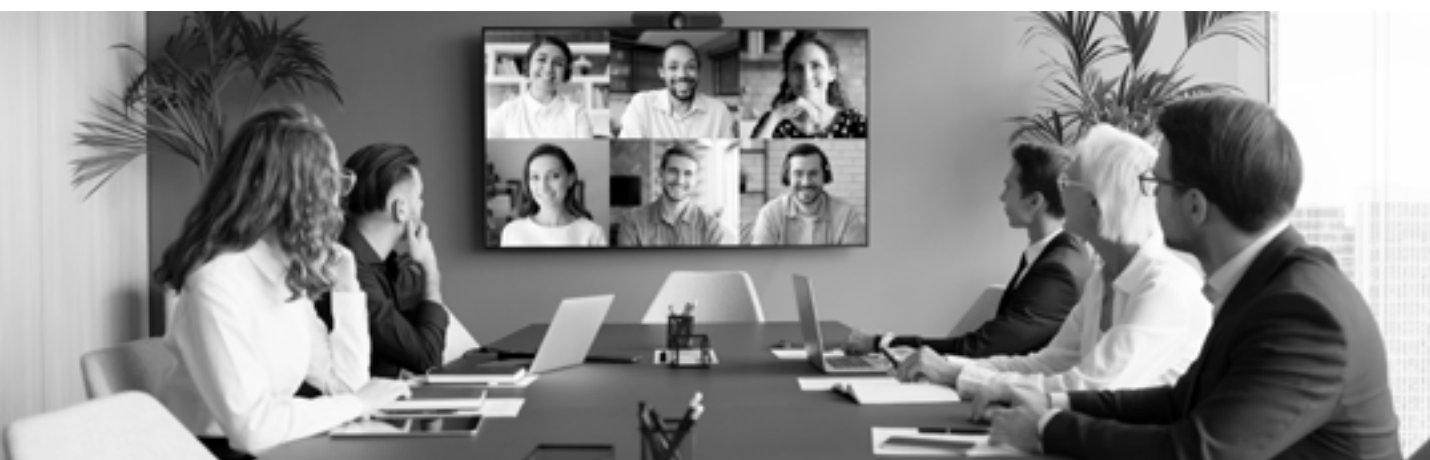
No, you shouldn't. Personal health information is sensitive and confidential, and you have a responsibility to keep it private. Work with Human Resources to accommodate the employee and only offer your team the information they need to know to do their jobs.



Find out more

- Employee Handbook
- Information Security Policy

- Privacy Policies
- Records Management Policy



Preserve privacy

We recognize that privacy is a basic human right. That is why we respect the personal information we collect, handling it with care, and following all laws designed to protect it.

Know what is required. Connecting people with the care they need is personal business, involving personal information. Whenever we collect or handle personal information from members, patients, customers, business partners, or employees, we follow all data privacy laws that require us to preserve plan privacy and protect data from misuse, loss, or unauthorized disclosure. Know how these laws and our policies apply to you. [Ask questions](#) if any requirement is unclear.

Know what is personal. Personal information is anything that can be used to identify someone. At Blue Shield, that can include individually identifiable personal information (IIPI), protected health information (PHI), and other sensitive information. It includes:

- 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
- Claims payment and benefit information
- Location data
- Company payroll data
- Employee identification numbers

Privacy is a right

We recognize that each person has a say in how their data is...

- Collected
- Stored
- Used
- Deleted

Treat personal information with respect. Recognize your responsibility to handle personal data respectfully and securely – as you would treat your own. That means collecting, accessing, and storing or disposing of personal data properly and legally. If you are aware of a possible breach of personal data, contact Blue Shield Law immediately.



Find out more

- Employee Handbook: Information Privacy
- Information Security Policy
- Privacy Policies



Lead with integrity

When you handle personal data, ask yourself:

Am I...

Carefully following our cybersecurity policies?

Using personal information for true business purposes?

Collecting only the information I need?

Only sharing it with authorized sources?

Honoring each person's privacy rights?

Make sure you can answer **YES** to each of these questions. If you cannot, stop and seek guidance.

Communicate responsibly

The way we talk about our company says a lot about us. It shows others who we are and what we stand for, so we represent Blue Shield professionally, consistently, and with integrity in every communication.

Speaking on Blue Shield’s behalf

Send a unified message. It is critical that our communications never harm or mislead anyone or violate any law or policy. To ensure consistent and appropriate messaging, always let authorized Blue Shield representatives do the talking – do not speak on our behalf. Sending the wrong message could also put you (and Blue Shield) at risk of [anti-competitive conversations](#), disclosing [confidential or proprietary information](#) or [inside information](#).

Handle requests with care. If you receive a request from the media or any other source, never claim to speak for Blue Shield or attempt to handle the request if you are not authorized. Refer the request to the proper Blue Shield resource.

Lead with integrity

Know how to handle requests



For media calls or interview requests

Refer them to Communications, Corporate Citizenship & Reputation.



If you are approached by a reporter

Get the person’s name and affiliation and contact Communications, Corporate Citizenship & Reputation – do not comment.



For requests for articles, speeches, endorsements, or public appearances

Get approval from your manager and Communications, Corporate Citizenship & Reputation.

Using social media

Participate responsibly. Remember, anything you post on social media can be read by anyone, anywhere, for a long time, so use caution. In any social media post, remain professional, helpful, and follow our values and policies. Never post anything false, harmful, harassing, dishonest or discriminatory or share confidential, proprietary, or personal information. Never post about specific members, patients, or business partners. If you do mention Blue Shield on social media, make it clear that you work for us, but you do not speak for us.



What if?

I saw a discussion on social media where several people were disparaging our company and making false claims that I could easily correct. If I replied carefully, helpfully, and professionally, would it be OK to correct them?

No, you shouldn’t. Your intentions may be good, and you may be able to effectively correct their statements, but doing so is risky if you are not authorized. Notify Communications, Corporate Citizenship & Reputation instead so we can address it properly through our established process.



Uphold our social responsibility

We are good neighbors, engaging with people and businesses to preserve human dignity, support communities in need, and preserve our environment. Together, we build a better world for everyone.

Community involvement

Help fulfill our commitment. Our business is all about people. We have a passion for improving lives and the communities where we live and work. We live our commitment through Blue Shield Cares and the [Blue Shield of California Foundation](#), which help us target issues, such as:

- Healthcare accessibility
- Affordability
- Quality
- Domestic violence prevention
- Environmental responsibility and health and wellness

We encourage, but do not require, you to get involved in these or other efforts to support people and communities.

Environmental stewardship

Make a positive impact. When it comes to our environment, we challenge the status quo and lead positive change in our world. We rely on you to help Blue Shield comply with and exceed the environmental laws, rules, and regulations that apply to us. Help us run a cleaner business by conserving and using resources efficiently and using sustainable methods whenever you can. Expect the same from our business partners.

How do we help?

Blue Shield sponsors initiatives and programs that promote:

- Ethics and compliance
- Social and economic sustainability
- Environmental stewardship and achieving zero waste operations
- Strong corporate governance
- Health and safety
- Employee wellness
- Corporate philanthropy

Watch for volunteer opportunities in your area.

Protecting human rights

Ensure fair treatment for all workers. As a socially responsible company, we believe every individual deserves fair, free, and safe employment. They should have reasonable working hours, safe working conditions, and fair wages. We prohibit child or forced labor or human trafficking anywhere in our operations, and we will not work with anyone who allows these practices.

Stand up for our world and our communities. If you are aware of human rights or environmental violations, or any activity that harms people or communities in any aspect of our business, [speak up](#) to your manager, Human Resources, Corporate Compliance & Ethics, or any of the resources listed in the Code.



4

Conducting business in a fair and honest manner

Dealing fairly and honestly in every action is a matter of pride at Blue Shield. By focusing on integrity and refusing to compromise our principles, we build trust and drive our business forward.

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Avoid conflicts of interest

We all want to do what is best for ourselves, but sometimes what is good for us may be harmful to our company. These situations are conflicts of interest – something we watch for, steer clear of, and disclose.

Put your commitment to Blue Shield first. Avoid getting involved in any situation that might influence the way you do your job or your ability to make unbiased decisions at work. Conflicts of interest (or even the appearance of a conflict) can harm our reputation and call your loyalty into question, especially if it is a situation that unfairly benefits you.

Do not ignore it – disclose it. If you think you might be facing a situation that pits your interests against Blue Shield’s interests, disclose it immediately to Corporate Compliance & Ethics – whether it is a real conflict or just the hint of a conflict. Letting us know about the situation allows us to work with you to avoid it or even resolve it – before it causes problems.

Be able to recognize conflicts. Conflicts of interest may not be obvious, but it is important that you learn to spot them. Conflicts can involve a variety of different situations, including:

- Accepting or requesting inappropriate gifts or entertainment – see [Follow the rules for gifts and entertainment](#)
- Accepting a second job or consulting engagement with a competitor, customer, or business partner
- Serving on a Board of Directors for a competitor or a company that does business with (or wants to do business with) Blue Shield
- Supervising a friend or family member or making employment decisions that benefit them
- Being involved in a personal or romantic relationship that could influence your duties or decisions
- Investing significantly in a customer’s company or in a vendor or other business partner
- Taking a business opportunity for yourself that belongs to Blue Shield
- Using Blue Shield’s contacts, resources, or information for personal gain

Am I facing a conflict?

The situation you are in may be a conflict of interest if it:

- Could affect your judgment
- Might interfere with your duties at Blue Shield
- Involves family members or friends
- Benefits you, a relative, or a friend, but not Blue Shield
- Requires you to use Blue Shield assets or information for personal benefit
- Looks like a conflict to someone else
- Could potentially damage our reputation

If any of these statements might be true, disclose the situation now.



It could happen

My aunt owns a business that’s applying to be a Blue Shield vendor. Since I just heard about this, and I don’t select our vendors, do I have to disclose this?

Yes, you should. While it’s helpful that you are not involved in selecting our vendors, conflicts could still arise if you’re given work that involves managing, monitoring, or working with this vendor in any way. Let your manager or Corporate Compliance & Ethics know about this situation so we can plan accordingly.

I have started my own web design business, working mostly for local small businesses. If this work doesn’t compete with Blue Shield’s business, that’s not a conflict of interest, is it?

That depends. If your web design work interferes with your work at Blue Shield or begins to compete with our business, then it could cause a conflict down the road. Keep this work completely separate from your Blue Shield job. Don’t use Blue Shield time or resources. Always disclose outside employment before it happens to Corporate Compliance & Ethics so we can evaluate the situation for an actual or perceived conflict of interest.



Find out more

- Conflicts of Interest Policy
- Employee Handbook: Personal Relationships at Work
- Gifts and Entertainment Policy



Follow the rules for gifts and entertainment

We base every relationship on honesty and mutual trust, treating each person with respect and never allowing a relationship or our reputation to be tarnished by inappropriate offers or gifts.

Use caution with any offer. Showing thanks is a good way to build relationships, but in business, the line between a token of thanks and a bribe can sometimes blur. When you are interacting with customers, vendors, or business partners, avoid any offers that could appear to influence someone’s decisions or look like a [conflict of interest](#).

Gifts are... tangible or intangible benefits, favors or opportunities, such as prizes, tickets, goods, travel, or meals or entertainment when the giver does not attend.

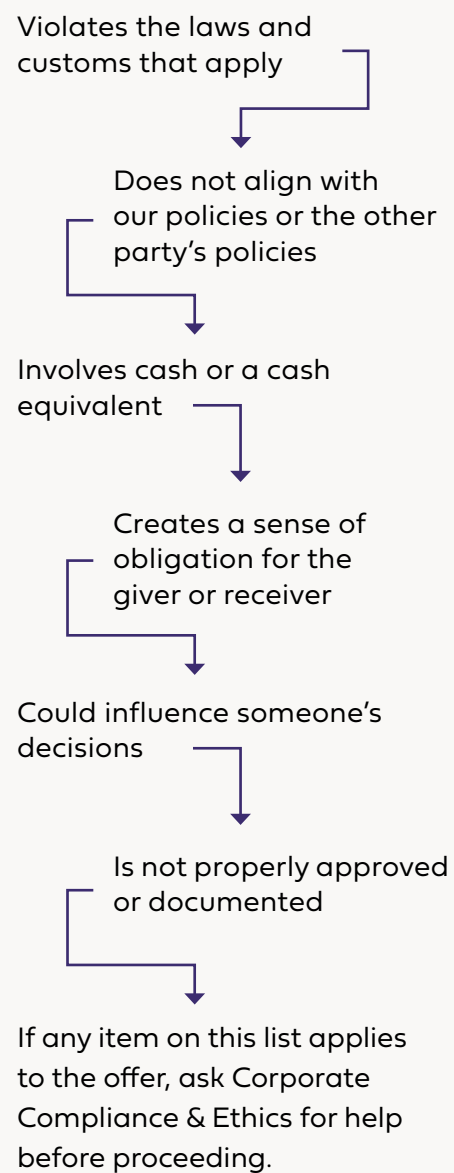
Entertainment is... an event where both the giver and recipient attend, such as meals, sporting events, and golf outings.

Acceptable offers are usually:

- Appropriate, customary, legal, and reasonable (below \$150 in value)
- Offered for a legitimate business reason
- Reasonable meals or entertainment that both parties attend
- Something other than cash or a cash equivalent

When is a gift NOT a gift?

It might be an inappropriate offer if it:



Follow the rules and use good judgment. Blue Shield does permit small, reasonable offers that have a legitimate business purpose, but you should never offer or accept anything with an expectation of something in return. If it is not appropriate, do not offer it or accept it. Always follow Blue Shield’s policies as well as the policies of the other party, especially when healthcare professionals are involved and rules can be stricter. If you have questions or if rules seem to conflict, ask Corporate Compliance & Ethics.

Be careful with government officials. When government officials are involved, even more restrictive rules apply. In short, never offer a government official anything of any value without proper approvals – no exceptions. Make sure our business partners follow the same rules. See [Prevent bribery and corruption](#) and [Work ethically with the government](#) to learn more.



Can we talk?

I’d like to invite one of my long-time business contacts who works for a government agency to a conference and pay for their travel expenses. Since it’s a legitimate business event and not a real gift, may I make the offer?

No, you may not. It doesn’t matter that it’s a business event. The rules we must follow with government officials are very strict and prohibit us from offering them anything of value.

At the end of the year, I received a gift basket from a supplier with a note of thanks for our business this year. The basket contains a nice assortment of food and wine – probably worth around \$100. May I accept it?

Yes, you may. As long as the gift is of reasonable value (below \$150) and only intended to maintain the business relationship (and not to influence you, your decisions, or a particular transaction), it’s acceptable.



Find out more

- Gifts and Entertainment Policy
- Anti-corruption Policy
- Travel and Expense Reimbursement Policy

Participate responsibly in charitable and political activities

Blue Shield encourages us to actively support the charitable and political causes that are meaningful to us. We are careful to show that support in a respectful, ethical, and independent way.

Political activities

Participate on your own. When you participate in political activities, do so in your own name. Do not support your political causes with Blue Shield’s name, funds, or resources (including computers or printers) without the approval of Corporate Compliance & Ethics. Your involvement must be on an individual basis, on your own time and at your own expense.

Charitable activities

Make a difference. Blue Shield is committed to the communities in which it does business and encourages employee volunteering or giving. You may participate in charitable activities and giving on an individual basis, on your own time and at your own expense. Blue Shield also participates in charitable activities that are aligned with our mission and values. See Employee Volunteering & Giving for more information on how you can participate.

What does lobbying involve?

For Blue Shield, it includes political activities, such as:

- Efforts to influence legislative or administrative action
- Communications with:
 - Legislators
 - Regulators
 - Executive branch officials or their staffs
 - Government officials, employees, or intermediaries
- Exchanging gifts, entertainment, or anything of value with government officials

Participate ethically. Never allow your personal activities to interfere with your obligations to Blue Shield or violate our policies or the law. Participate on your own time and never contribute to a candidate, campaign, or cause in our name or make statements on our behalf. Also remember, we work in a highly regulated industry and need approval from Blue Shield Law for any lobbying activities or political contributions involving government agencies with which we work.

Participate respectfully. Remain respectful of your colleagues. Remember, they have the right to hold their own opinions and support the causes of their choice. Never share or post political materials or pressure colleagues to support a charitable or political cause or purchase a product. And if you ever run for political office, notify your manager and Corporate Compliance & Ethics so we can help you avoid a potential [conflict of interest](#).



Find out more

- Employee Handbook: Solicitation
- Employee Volunteering & Giving



Ensure fair dealing

Committing to strong partnerships and a fair and honest way of working helps us make unbiased decisions, move ahead with confidence, and do our best for Blue Shield and our customers.

With business partners

Start relationships on an ethical note. If your work involves choosing Blue Shield’s business partners, research them carefully and work with applicable internal stakeholders to make sure partners share our commitment to the highest standards of conduct and compliance with the law and our policies.

Choose fairly. Do not let personal biases or discrimination influence your choice of business partner. Choose them based on factors such as their delivery record, reputation, and ability to fulfill Blue Shield’s needs leveraging the selection and contracting processes and working with the responsible internal process stakeholders.

Act ethically. Set high standards for business partners and never ask them to do anything improper. Protect their [confidential and proprietary information](#) and expect them to protect ours.

Pay attention. Watch the work of our suppliers, vendors, consultants, providers, and other business partners to ensure they are living up to our values and Cornerstones. Contact Global Business Services or our Provider Contracting Team with questions and [report](#) possible misconduct immediately.

Our business partners include...

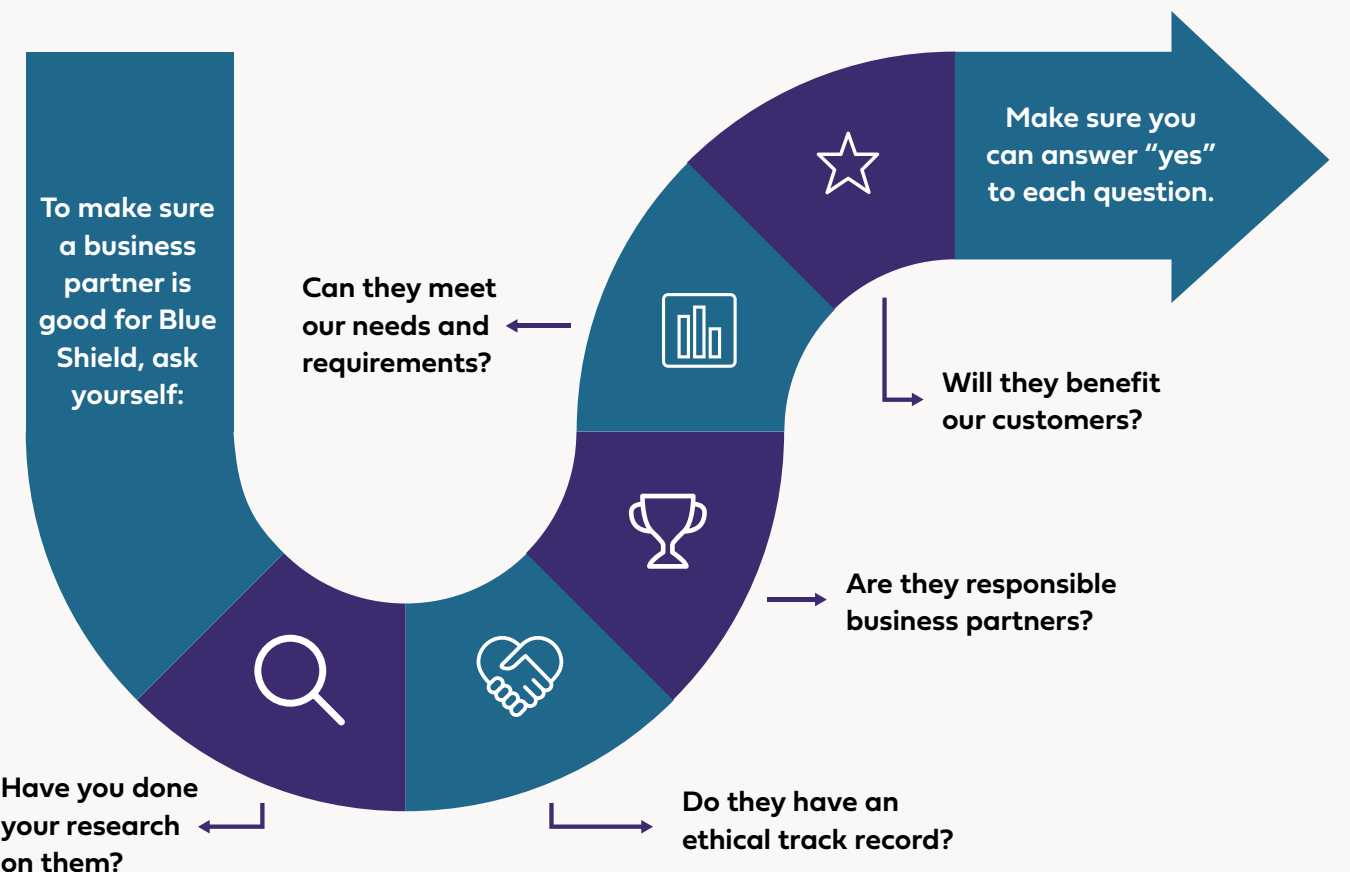
- Providers
- Suppliers
- Vendors
- Producers
- Consultants
- Contractors
- Subcontractors
- Agents

With customers

Keep our promises. In our interactions and contracts with customers, we always strive to exceed expectations. Be honest and help us fulfill our obligations reliably, transparently, and in accordance with the rules that apply to us.

Ensure honest promotions. If you sell, market, or promote Blue Shield’s products and services, be accurate and transparent and never make inaccurate or unfair comparisons to our competitors. Giving false or misleading information violates the law and our policies, so be able to back up every claim you make.

Lead with integrity



Follow trade compliance laws

California is our home, but we also interact with people and providers in other countries. Working internationally brings new opportunities, but it can also put us in unfamiliar territory, with differing rules and customs. That's why we carefully follow the laws that apply to our business.

Know the law. Although Blue Shield doesn't export products, we are subject to trade laws when providing information, technology, or software to anyone outside the United States. Violations carry serious penalties, so learn how these laws apply to you and [ask questions](#) if anything is unclear.

Check and double check. Trade rules change often, so know when and how to get necessary clearances, licenses, and government approvals. Classify and document imports and exports carefully, focusing on accuracy and completeness.

Choose ethical business partners. If you select international business partners, notably vendors, suppliers, or consultants for Blue Shield, [do thorough research](#) and engage with Global Business Services, to make sure every partner works with integrity and does not work with restricted or sanctioned countries or entities. Watch for and [report](#) possible trade law violations immediately.

What do trade laws do?

They govern how businesses:

- Sell
- Purchase
- Import
- Export or re-export
- Transfer
- Ship
- Purchase goods, services, software or technology

They include requirements for export:

- Classification
- Licensing
- Border clearance
- Reporting
- Recordkeeping

They also prohibit participation in boycotts, sanctions, and embargoes of countries or entities that are not approved by the U.S. government.



Can we talk?

A customer has asked that we not do business with a vendor, citing the country where they're located. Neither the country nor the vendor has been sanctioned by the U.S. government. What should I do?

You should notify Blue Shield Law or Global Business Services or Corporate Compliance & Ethics right away about this request.



Compete fairly

We view competition as a great motivator. It pushes us to be better and do better for our customers. We are also committed to competing fairly, following the law, and ensuring that everyone has a chance to compete.

Play by the rules. We work in a competitive industry, but we never use unfair or illegal practices to succeed. Know the antitrust and competition laws that apply to us. Remember, rules differ around the world and violations can lead to severe consequences. Contact Blue Shield Law if you are not sure how a law applies to you.

Remember, we succeed only through:

- The merits of our services
- The value we offer
- The hard work we do
- The trust we earn

Use care in every interaction. When dealing with Blue Shield’s competitors, customers, or business partners, do what is legal, fair, and ethical. Watch your conversations at industry conferences and trade association meetings. Never misrepresent yourself or make (or hint at) any improper agreements that give you or Blue Shield an unfair advantage or prevent anyone from competing. And when promoting Blue Shield, never make false claims or dishonest comparisons to the competition.



Do honest and ethical homework. When researching our competitors, gather information legally. Only use publicly available information, like what you might find online, in the news, or in industry journals. Never try to obtain (or accept) illegally sourced information, for example, [confidential or proprietary information](#) gathered from a former employee, a business partner, or anyone else who is violating a confidentiality agreement.



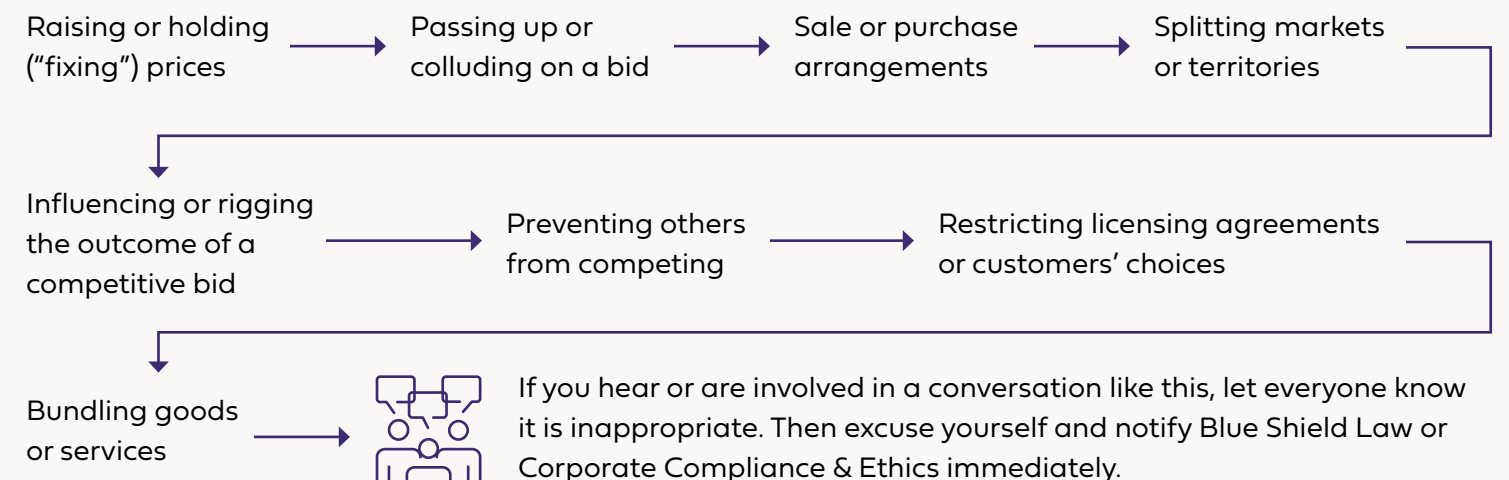
It could happen

Some competitors were chatting at a trade show. They invited me to lunch to discuss “making our pricing models more attractive.” If we do not discuss anything that hinders competition, is it OK to attend?

No, it’s not. Although your intentions may be good, the discussion could turn to fixing prices, which could violate both Blue Shield’s policies and the law. Politely turn down the invitation, letting the competitor know that the meeting would be inappropriate. Report the request immediately to Blue Shield Law.

Lead with integrity

Check yourself. Is a competitor discussing:



Protect inside information

We believe no one should have an unfair advantage in investing. That is why we follow the law to keep material, nonpublic information confidential – we never share, leak, or use it as a basis for trading.

Learn about insider trading. Insider trading happens when someone uses information that is not publicly available to make investment decisions, or shares it with someone else so they can invest – an act known as **tipping**. Insider trading can impact stock prices, destabilize markets, and lead to severe penalties for anyone involved.

Know your role and follow the rules. Being a Blue Shield employee can give you access to material, nonpublic, or inside information about publicly traded companies, including our customers, business partners, and competitors. Having that information can inform someone’s decisions to buy, sell, or hold securities – before others in the market. Always keep this information confidential, including:

- Corporate earnings
- Business performance or projections
- Mergers or acquisitions
- Leadership changes
- New product announcements
- Contract wins or losses
- Pending lawsuits or regulatory actions

Never share confidential, inside information with anyone who is not authorized. Follow our policies to keep it secure.

“Material” information

Has the potential to influence investors and raise or lower stock prices.

“Nonpublic” information...

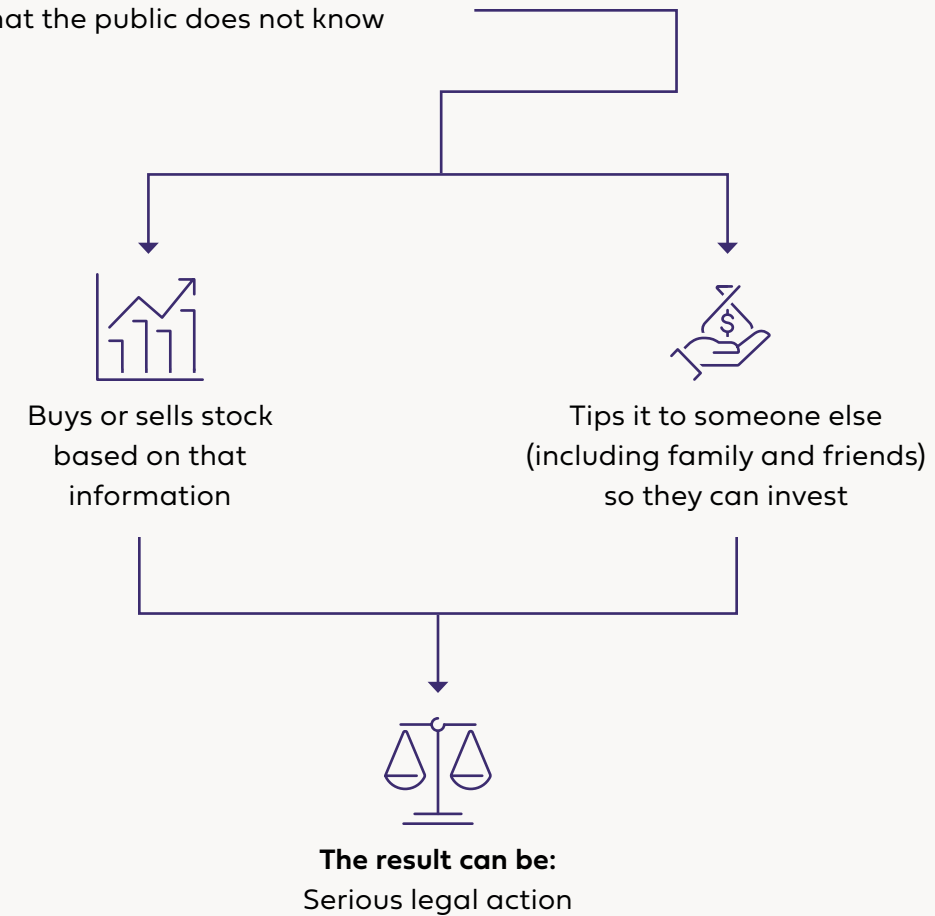
Has not been made public (such as through a press release or other official communication).

Invest carefully. Before you trade, make sure you are not using inside information to trade securities. Never share this information with anyone else, even inadvertently. If you are not sure if it is OK to trade, ask Blue Shield Law before trading.

Insider trading can happen ...

When someone:

Learns something about a business that the public does not know



Prevent bribery and corruption

We believe in hard work – succeeding honestly and never resorting to acts of bribery or corruption, which can damage Blue Shield’s reputation. Our commitment to working ethically and honestly helps keep this activity in check and out of our business.

Know and follow the law. Because we work in a highly regulated industry, we are subject to many anti-corruption and anti-bribery laws. Get to know these laws and how they apply to you, wherever you are conducting business. If you have a question about a law, or if different laws seem to conflict, reach out to Blue Shield Law for help.

Hold yourself to the highest standards. In your dealings with customers, business partners, or any other entity, follow our policies carefully. Never offer or accept inappropriate [gifts](#), [entertainment](#) or anything that might look like a bribe. Expect our business partners to do the same. Pay special attention when [government officials](#) are involved, as the rules are even more restrictive.



Lead with integrity

To make sure an offer is acceptable, make sure it:

- Complies with all laws that apply
- Aligns with local customs
- Follows Blue Shield’s policies
- Also honors the other party’s policies
- Has all necessary approvals in place
- Is properly documented

If you cannot check off each item on this list, stop and ask Blue Shield Law for guidance.

Help prevent money laundering. We are also committed to complying with the laws designed to prevent financial crimes, terrorist activities, and money laundering, which happens when funds earned from illegal activities are run through a company to make them look legitimate. Watch for and speak up about suspicious financial transactions and activities immediately to Blue Shield Law, and if required, to the appropriate government agency.



A bribe is...

Something of value that is offered with the goal of influencing someone’s business decisions or to gain an advantage



It can look like...

Improper offers, including:

- Cash or cash equivalents
- Lavish gifts, meals, or entertainment
- Stock
- Passes or promotional items
- Use of the giver’s name, materials, or equipment
- Loans or special discounts (not available to others)
- Charitable or political contributions
- Payment of travel expenses



It can involve...

Kickbacks – giving money or something of value in exchange for a business transaction

Facilitation payments – small payments made to expedite a routine government function or service



Find out more

- Anti-corruption Policy
- Gifts and Entertainment Policy

Work ethically with the government

Blue Shield proudly partners with a variety of government entities. We base these relationships on mutual trust and integrity and recognize our responsibility to meet the many special requirements that apply.

Honor our obligations. The government keeps a list of individuals and organizations that have been excluded or debarred from participation in federally and state-funded programs, such as Medicare and Medi-Cal. Blue Shield also may not lawfully employ individuals who have been convicted of certain specified felonies. Blue Shield routinely screens for employees and business partners who may be identified on these lists to ensure compliance. Persons identified on an exclusion list may be subject to termination of employment or assignment. If you are convicted of a felony or become aware that you have been added to government exclusion list, you must immediately report it to your manager.

Ask questions. If you are ever uncertain about the laws that apply to us or any other legal, regulatory, or contractual requirements that apply to our government contracts, contact your manager, Corporate Compliance & Ethics or Blue Shield Law.

Be honest and ethical. Highlight integrity in every interaction with government officials. Never offer them anything of value and be accurate and complete in all government records and certifications. Never falsify records or give misleading information. Charge all claims to the correct accounts, and never include improper costs. Immediately report violations of these requirements to the proper department manager.

Handle information with care. Never request classified, confidential, or proprietary government information without proper authorization. If you inadvertently receive this kind of information, do not use it or disclose it. Immediately notify the appropriate Blue Shield department.

How do these rules affect us?

Special government requirements can impact Blue Shield's practices such as:

- Bidding
- Accounting
- Invoices
- Subcontracting
- Recruiting and hiring
- Offering gifts or hospitality
- Contract performance
- Purchasing



Before you go

We appreciate you learning Blue Shield’s Code of Conduct. Being familiar with the Code helps us all uphold the high standards we set for ourselves.

Now it is time to...



If you have a question about anything in the Code or our policies, or if you cannot find an answer to a particular question, please ask your manager for help or contact one of the resources listed in the Code.

For more help

If you have questions or need guidance, access the following resources:

To ask questions or report potential misconduct or other ethical concerns:

- Your manager or another manager
- Human Resources
- Corporate Compliance & Ethics – to submit a Compliance Inquiry Report
- Blue Shield Law
- Internal Audit
- Corporate Finance
- Senior Leadership

Or you also may contact:

Blue Shield’s Compliance Hotline



By phone
Toll-free at **1-855-296-9083**



By email
CorpComp@blueshieldca.com



Or online
bsccomplianceandethics.alertline.com

The Compliance Hotline is available 24 hours a day, 365 days a year and is operated by an independent third-party provider.

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.