

HEALTH CARE SERVICE CORPORATION CORPORATE POLICY

DEPARTMENT: Ethics & Compliance	POLICY NUMBER 5.06	ORIGINAL EFFECTIVE DATE: (if known)
POLICY TITLE: Non-Retaliation Policy		EFFECTIVE DATE: June 26, 2020
		LAST REVISION DATE: June 2020
EXECUTIVE OWNER: SVP Chief Ethics, Compliance and Privacy Officer	BUSINESS OWNER: Sr. Dir Corporate Compliance	LAST REVIEW DATE: June 2020

I. SCOPE

The Policy applies to each employees' role to ensure their duty to report ethical concerns or violations, that reports can be anonymous (to the extent allowed by law) and confidential, and that HCSC prohibits retaliation.

II. PURPOSE

- A. Health Care Service Corporation's ("HCSC") leadership believes that it is essential to conduct business operations in full compliance with applicable laws and regulations and to comply with and enforce established policies and the Code of Ethics and Conduct ("the Code"). Any failure to comply with these laws, regulations, policies and the Code seriously threatens the business and reputation of HCSC, shakes the confidence of HCSC's customers, employees, and other constituents, and is contrary to HCSC's purpose and obligations to the communities in which it does business.
- B. Further, to better ensure compliance with these laws, regulations, policies, and the Code, employees and contingent workers must fulfill their obligation to report potential issues or violations, and HCSC must remove impediments, which may otherwise discourage employees and contingent workers from reporting potential issues or violations.
- C. Accordingly, HCSC prohibits retaliation against an employee, contingent worker or other individual who, in good faith, reports a potential issue or violation, participates in the investigation of an alleged issue or violation, conducts a self-evaluation or audit, implements remedial action, or reports to appropriate officials. This policy is to provide guidance on reporting compliance issues and to protect employees or other persons who report such matters from retaliation for reporting such matters.

III. POLICY:

- A. All employees of HCSC promptly report, through proper channels any activity or issue which the employee or contingent worker believes, in good faith, may be a violation of a law, regulation, HCSC policy, the Compliance Program or the 6 Code. This includes activities conducted by the employee or contingent worker. In addition, each employee and contingent worker must cooperate with any investigation conducted or sponsored by HCSC in connection with any alleged issue or violation of policy, law regulation, the Compliance Program, or the Code.
- B. Further, neither HCSC nor any of its employees or contingent workers will retaliate against any employee, contingent worker or other individual for reporting, in good faith a potential issue or violation, for participating in the investigation of an alleged issue or violation, for conducting a self-evaluation or audit, for implementing remedial action, or for reporting to appropriate officials. The term "other individual" refers to consultants, contractors, members, providers, vendors, and producers and other similar entities with whom HCSC does business.
- C. It is the responsibility of all employees and contingent workers to report any potential issue or violation of which they may be aware and cooperate fully with any HCSC-related investigation. To the extent possible, these actions will be considered mitigating circumstances in connection with corrective action taken against an employee or contingent worker based on his or her participation or involvement in the alleged issue or violation.

IV. DEFINITIONS:

Retaliation means the taking of any unfavorable employment action or other negative action against an employee, contingent worker or other individual because the employee, contingent worker or other individual reported a potential issue or violation, participated in the investigation of an alleged issue or violation, conducted a self-evaluation or audit, implemented remedial action or reported to appropriate officials. Employees and contingent workers are defined according to the Workforce Classification Policy in the HCSC H.R. Policies.

V. CONSEQUENCE OF VIOLATION

- A. Employees or contingent workers who fail to report known issues or violations or who fail to cooperate with HCSC officials engaged in an investigation of potential issues or violations, are subject to corrective action up to and including termination of employment or end of engagement.
- B. Any supervisor, manager, office, or other employee or contingent worker who retaliates against an employee, contingent worker or other individual who reports a potential issue or violation participates in the investigation of an alleged issue or violation, conducts a self-evaluation or audit, implements remedial action, or reports to appropriate officials is also subject to corrective action up to and including termination of employment or end of engagement. An employee or contingent worker or other individual who believes that he/she has been retaliated against in violation of this Policy should report his/her concern consistent with the process stated in the following Process for Reporting.

VI. EMPLOYEE AND CONTINGENT WORKER OBLIGATION TO REPORT

Each employee and contingent worker is obligated to promptly and forthrightly report any potential issue or violation of applicable laws, regulation, company policy, or the Code that comes to the employee's or contingent worker's attention, even if the potential issue or violation involves wrongdoing on the part of the employee or contingent worker making the report. In addition, the employee or contingent worker must cooperate fully with any investigation of a potential issue or violation.

VII. PROCESS FOR REPORTING VIOLATIONS:

There are many reporting options:

- A. Discuss the issue with an immediate Supervisor. This is usually the most effective way to address a concern. If the employee or contingent worker is not comfortable doing this, they may go to any other Supervisor or choose the next resource.
- B. Discuss the issue with another Corporate Resource or the Chief Ethics and Compliance Officer. If the employee or contingent worker is not comfortable doing this, they may choose the next resource.
- C. Call HCSC's Corporate Integrity HOTLINE at 1-800-838-2552 or report the concern using one of the other options listed below. The call can be anonymous; and the employee or contingent worker does not have to give their name. However, identifying is preferred, as this allows the Ethics and Compliance Department to interact directly with the employee or contingent worker and obtain information to help resolve their concern. For more information, see the section of the Code titled Corporate Integrity HOTLINE.
- D. Issues may also be reported in writing and emailed to the Ethics and Compliance Department at CorporateCompliance@bcbsil.com or faxed to (312) 938-5431. For anonymous web reporting, go to <https://hcsc.alertline.com> and follow the prompts to file a report or follow up on an existing report.
- E. Note: HCSC will preserve the anonymity of an employee or contingent worker subject to the limits imposed by law and the specific circumstances surrounding the complaint.
- F. Any violation of this policy may result in appropriate corrective action, up to and including termination of employment or end of engagement.

VIII. RELATED DOCUMENTS

- 1. Workforce Classifications Policy
- 2. Compliance with the Law, 5.02
- 3. Confidential Information, 5.03
- 4. Conflict of Interest, 5.04
- 5. Fair Competition, 5.05
- 6. Internal Controls, 3.03
- 7. Code of Ethics and Conduct
- 8. Corporate Integrity and Compliance Program Charter

IX. SOURCES/REFERENCES

N/A

X. POLICY REVIEWERS

Person Responsible for Review	Title	Date of Review
Carrie O’Gara	Sr. Dir Compliance Investigations	4/8/2020
Jon Anderson	Sr Mgr. Compliance Investigations/Hotline	6/12/2020
Chris Walker	DVP & Sr Managing Counsel	6/26/2020
Kelly Jacks	Sr. Director Workforce Solutions	6/26/2020

XI. POLICY REVISION HISTORY

Description of Changes	Revision Date
New template utilized	March 2020
Updated Hotline Reporting Process to align with Code of Conduct	May, 2020

XII. POLICY APPROVALS

Company, Division, Department and/or Committee	By: Name	Title	Approval date
CASSIP	Tom Lubben	SVP Ethics, Chief Compliance and Privacy Officer	6/26/2020