

HEALTH CARE SERVICE CORPORATION

CORPORATE POLICY

Title: Non-Retaliation	Policy No.: 5.06
Owner/ Approval by:	Vera Malone, VP, Ethics and Compliance
Date of Last Review:	February 2019
Approved by:	Thomas C. Lubben, SVP, Chief Compliance and Privacy Officer
Date of Last Review:	February 2019
New Policy <input type="checkbox"/>	
Revised Policy <input checked="" type="checkbox"/>	Replaces Policy No.: Policy Title:

POLICY:

It is a condition of employment and engagement that every employee of the Company and its subsidiaries (full-time, part-time, seasonal and temporary) and (staff augmentation/independent contractor) 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, Company policy, the Compliance Program or the Code of Ethics and Conduct ("the 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 the Company in connection with any alleged issue or violation of policy, law regulation, the Compliance Program or the Code.

Further, neither the Company 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 the Company does business.

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 Company-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.

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 Workforce & Employment Policies.

RATIONALE:

The Company's 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. Any failure to comply with these laws, regulations, policies and the Code seriously threatens the business and reputation of the Company, shakes the confidence of the Company's customers, employees, and other constituents, and is contrary to the Company's purpose and obligations to the communities in which it does business.

Further, to better ensure compliance with these laws, regulations, policies, and Code, employees and contingent workers must fulfill their obligation to report potential issues or violations, and the Company must remove impediments, which may otherwise discourage employees and contingent workers from reporting potential issues or violations.

Accordingly, the Company prohibits retaliation against an employee, 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.

CONSEQUENCE OF VIOLATION:

Employees or contingent workers who fail to report known issues or violations or who fail to cooperate with Company officials engaged in an investigation of potential issues or violations, are subject to corrective action up to and including termination of employment.

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. An employee or contingent worker 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.

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.

PROCESS FOR REPORTING:

This is the process for reporting a concern:

Step 1: The employee or contingent worker should discuss the issue with his or her **first level management**.

If the first level management cannot find the answer, or if the employee or contingent worker feels uncomfortable discussing the issue with his/her management, the employee or contingent worker can go to Step 2.

Step 2: The employee or contingent worker should discuss the issue with the next **higher-level management**.

If the first level management cannot find the answer, or if the employee or contingent worker feels uncomfortable discussing the issue with his/her management, the employee or contingent worker can go to Step 3.

Step 3: The employee or contingent worker should discuss the issue with **other available resources** for example Compliance, Audit Services, Special Investigation Department, Corporate Protection and Security, Information Security, Privacy, Performance Audit, as well as Human Resources, Legal, Government Program Compliance, Enterprise Risk Assessment or Governance.

Step 4: The employee or contingent worker should call the **Corporate Integrity HOTLINE** at 1-800-838-2552 or report your concern to one of the email options listed below:

Note: All calls will be treated confidentially. When calling the HOTLINE, the employee or contingent worker can remain anonymous. The Company will preserve the anonymity of caller's subject to the limits imposed by law and the specific circumstances surrounding the complaint. Issues may also be reported in writing and emailed to the Ethics and Compliance Department or faxed to (312) 938-5431. For anonymous email reporting, log into <https://hcsc.alertline.com> and follow the prompts to file a report or follow up on an existing one.

ADDITIONAL RESOURCES:

Policy Links

Workforce Classifications Policy
Compliance with the Law, 5.02
Confidential Information, 5.03
Conflict of Interest, 5.04
Fair Competition, 5.05
Internal Controls, Corporate Policy, 3.03