

HEALTH CARE SERVICE CORPORATION

CORPORATE POLICY

DEPARTMENT: Ethics & Compliance	
POLICY NUMBER: 5.06	POLICY TITLE: Non-Retaliation Policy
EXECUTIVE OWNER: EVP, Chief Administrative Officer & Chief Ethics, Compliance and Privacy Officer	BUSINESS OWNER: Executive Director, Corporate Compliance
ORIGINAL EFFECTIVE DATE (IF KNOWN):	COMMITTEE APPROVAL DATE: 05/02/2024

I. SCOPE

This policy applies to all employees and contingent workers as defined in the HR Workforce Classifications Policy (“Workers”) of Health Care Service Corporation, a Mutual Legal Reserve Company, as well as its majority-owned (greater than 50%) subsidiaries (collectively “HCSC”).

II. PURPOSE

1. The leadership of HCSC 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, procedures, the Compliance Program and the Code of Ethics and Conduct (“the Code”).
2. Each Worker plays an important role in ensuring compliance with applicable laws, regulations, policies, and the Code and all Workers must report potential issues or violations of applicable laws, regulations, policies and procedures, the Compliance Program and/or the Code (collectively referred to herein as “violations”).
3. HCSC is committed to allowing and encouraging Workers to report potential issues or violations. Accordingly, HCSC prohibits retaliation against a Worker or other individual who, in good faith, reports a potential violation, participates in the investigation of an alleged violation, conducts a self-evaluation or audit, implements remedial action, or otherwise makes a good faith report to appropriate officials.
4. This policy is to provide guidance on reporting compliance issues and to protect Workers or other persons who report such matters from retaliation for reporting such matters.

III. DEFINITIONS

Retaliation means the taking of any adverse employment action or other negative action against a Worker or other individual because the Worker or other individual reported a potential issue or violation, participated in the investigation of an alleged

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issue or violation, conducted a self-evaluation or audit, implemented remedial action or reported to appropriate officials.

Retaliation does not mean an adverse employment action, other negative action or change in responsibilities that is based on performance, misconduct or changing business needs.

IV. POLICY

A. OVERVIEW

1. All Workers must promptly report, through proper channels, any activity or issue that the Worker believes, in good faith, may be a violation, including activities conducted by the Worker.
2. Neither HCSC nor any of its Workers will retaliate against any Worker or other individual for reporting, in good faith, a potential issue or violation, for participating in the investigation of an alleged violation, for conducting a self-evaluation or audit, for implementing remedial action, or for reporting in good faith to appropriate officials. The term "other individual" refers to consultants, contractors, members, providers, vendors, and producers and other similar persons or entities with whom HCSC does business.
3. It is the responsibility of all Workers to report any potential violation of which they may be aware and cooperate fully with any HCSC-related investigation. These actions may be considered mitigating circumstances in connection with corrective action taken against a Worker based on their participation or involvement in the alleged issue or violation.

B. CONSEQUENCE OF VIOLATION

1. Workers who fail to report known violations or who fail to cooperate with HCSC officials engaged in an investigation of potential violations, are subject to corrective action up to and including termination of employment or end of engagement.

C. OPTIONS FOR REPORTING VIOLATIONS

The following are options for reporting potential violations:

1. Discuss the potential violation with the reporting Worker's immediate Supervisor. This is usually the most effective way to address a concern. If the Worker is not comfortable doing this, they may go to any other Supervisor or choose the next option below.
2. Discuss the potential violation with another [Corporate Resource](#) or the Chief Ethics, Compliance and Privacy Officer. If the Worker is not comfortable doing this, they may choose the next option below.
3. Call HCSC's Corporate Integrity HOTLINE at 1-800-838-2552. The call can be anonymous; and the Worker does not have to give their name. However, providing

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identifying information is preferred, as this allows the Ethics and Compliance Department to interact directly with the Worker and obtain information to help resolve their concern. For more information, see the section of the Code titled Corporate Integrity HOTLINE.

4. Potential violations 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.
5. Note: HCSC will preserve the anonymity of a Worker subject to the limits imposed by law and the specific circumstances surrounding the complaint.
6. Any violation of this policy may result in appropriate corrective action, up to and including termination of employment or end of engagement.

V. CONTROLS/MONITORING

Control Document or Control Description	Control Owner
As part of orientation, and on an annual basis thereafter, all Workers are required to complete computer-based training on the Compliance Program. This training is assigned by the Ethics and Compliance Department.	Ethics and Compliance
All Workers are required to sign the Commitment to Ethics Certification at the time of New Hire Ethics and Compliance training and annually thereafter. Required certifications are signed electronically. The signed Certification is maintained in HCSC's Learning Management System.	Ethics and Compliance

VI. RELATED DOCUMENTS

1. [HCSC Corporate Policy Manual](#)
2. [Compliance Program Charter](#)
3. [Corporate Policy 5.01 - Compliance Program](#)
4. [Corporate Policy 5.02 - Compliance with the Law](#)
5. [Corporate Policy 5.03 - Confidential Information](#)
6. [Corporate Policy 5.04 - Conflict of Interest](#)
7. [Corporate Policy 5.05 - Fair Competition](#)
8. [Code of Ethics and Conduct](#)
9. [Code of Ethics and Conduct for Vendors](#)
10. [Code of Ethics and Conduct for Directors](#)
11. [Code of Ethics and Conduct for Subsidiary Directors](#)
12. [HR Workforce Classifications Policy](#)

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VII. POLICY REVIEWERS

Person Responsible for Review	Title	Date of Review
Carrie O'Gara	Executive Director Corporate Compliance	2/26/24
Jon Anderson	Director Compliance Investigations/Hotline	3/12/24
Kelly Jacks	Sr. Director Workforce Solutions	3/11/24
Norm Beck	Vice President Litigation	4/11/24
David Culberg	Managing General Counsel	3/11/24

VIII. POLICY REVISION HISTORY

Description of Changes	Revision Date
Annual review with minor updates	5/2/24

IX. POLICY APPROVALS

Company, Division, Department and/or Committee	By: Name	Title	Approval date
CASSIP	Jill Wolowitz	EVP, Chief Administrative Officer & Chief Ethics, Compliance and Privacy Officer	4/24/24
EPP Committee			5/2/24