

Standards of Conduct

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Introduction

Liberty Advantage maintains certain policy and reference documents to guide its Plan employees, contractors, officers, governing body, and First-Tier, Downstream, and Related Entities (FDRs) with respect to their day-to-day conduct and performance. For purposes of these Standards, “employees” include all permanent, temporary, full-time, part-time, and volunteer employees who 1) have primary job duties related to Liberty Advantage’s Part C and Part D operations and/or sales; and/or 2) are members of the Liberty Advantage Board of Directors.

This document represents Liberty Advantage’s Standards of Conduct (hereafter referred to as “Standards”). These Standards describe the overarching principles and values of the organization. Compliance with these Standards is the responsibility of all Liberty Advantage employees and business associates, as well as first tier and downstream entities performing services on behalf of the Plan. The document outlines expectations of employee conduct in areas where improper activities could negatively impact Medicare Advantage beneficiaries and Medicare funds; damage Liberty Advantage’s reputation and otherwise result in serious adverse consequences to Liberty Advantage and to the involved parties.

Liberty Advantage is committed to comply with all applicable Federal and State standards and expects all Plan employees to conduct themselves in an ethical manner, and to report all instances of noncompliance and potential fraud, waste, and abuse (FWA) through appropriate mechanisms. These Standards identify how issues can be reported and that such reporting can be done anonymously and confidentially, and without fear of retaliation. Liberty Advantage has a widely-published and enforced no-tolerance policy for retaliation or retribution against any person who reports potential FWA. Reported issues will be addressed and corrected in a timely manner. In addition, compliance and ethics are valued at the highest levels of authority within the organization.

As Liberty Advantage continues to grow, and as federal and state laws change, the need may arise and Liberty Advantage reserves the right to revise, supplement, or rescind any policies or portion of these Standards as it deems appropriate, in its sole and absolute discretion. Employees will be notified of changes to these Standards as they occur.

As a condition of employment, all new Plan employees, officers, and governing body members will receive these Standards along with the required compliance training within the first 90 days of hire. Existing Liberty Advantage employees will receive these Standards at least annually or upon revisions.

The actions of a Plan employee under these Standards are significant indications of the individual’s judgment and competence. Accordingly, those actions constitute an important element in the evaluation of the employee for position assignments and promotion. Correspondingly, insensitivity to or disregard of these Standards’ principles will be grounds for appropriate management disciplinary action per the *Disciplinary Standards* policy.

Business Ethics and Conduct

The successful business operation and reputation of Liberty Advantage is built upon the principles of fair dealing and ethical conduct of Plan employees. Simpra Advantage's reputation for integrity and excellence requires careful observance of the spirit and letter of all applicable laws and regulations, as well as a scrupulous regard for the highest standards of conduct and personal integrity. Liberty Advantage's success is dependent upon its members' trust, and we are dedicated to preserving that trust. Employees are expected to conduct themselves in a way that will merit the continued trust and confidence of members. Liberty Advantage will comply with all applicable laws and regulations. As such, employees are expected to conduct business in accordance with the letter, spirit, and intent of all relevant laws and to refrain from any illegal, dishonest, or unethical conduct.

In general, the use of good judgment, based on high ethical principles, will guide each employee with respect to lines of acceptable conduct. If a situation arises in which it is difficult to determine the proper course of action, the matter should be discussed openly with the resource's immediate supervisor and, if necessary, with the Liberty Advantage Compliance Officer. Disregarding or failing to comply with this standard of business ethics and conduct could lead to disciplinary action, up to and including possible termination of employment.

Conflict of Interest

Employees have an obligation to conduct business within guidelines that prohibit actual or potential conflicts of interest. Conflict of interest is defined as a situation in which a person has a financial interest, personal interest, or relationship that could impact the person's ability to act impartially and in the best interest of the Plan when performing his or her duties. These Standards establish the framework and general direction within which Liberty Advantage wishes the business to operate. Where necessary, employees should seek further clarification on issues related to the subject of acceptable standards of operation. Contact the Liberty Advantage Compliance Officer at compliance@libertyadvantageplan.com for more information or for any questions concerning conflicts of interest.

Transactions with outside firms must be conducted within a framework established and controlled by the executive level of Liberty Advantage. Business dealings with outside firms should not result in unusual gains for those firms. Unusual gains refer to bribes, product bonuses, special fringe benefits, unusual price breaks, and other windfalls designed to ultimately benefit the employer, the employee, or both. An actual or potential conflict of interest occurs when an employee is in a position to influence a decision that may result in a personal gain for that person or for a relative as a result of Liberty Advantage's business dealings. For the purposes of these Standards, a relative is any person who is related by

blood or marriage, or whose relationship with the employee is similar to that of persons who are related by blood or marriage.

No “presumption of guilt” is created by the mere existence of a relationship with outside firms. However, if employees have any influence on transactions involving purchases, contracts, or leases, it is imperative they disclose any such relationships to Liberty Advantage management as soon as possible so that safeguards can be established to protect all parties. Personal gain may result not only in cases where the person or relative has a significant ownership in a firm with which Liberty Advantage does business, but also when the person or relative receives any reward, bribe, substantial gift, or special consideration as a result of any transaction or business dealings involving Liberty Advantage.

Prohibition of Improper Payments

Liberty Advantage expects all employees to use only legitimate practices in commercial operations and in promoting Liberty Advantage’s position on issues before governmental authorities. As stated below, “kickbacks” or “bribes” intended to induce or reward favorable buying decisions and governmental actions are unacceptable and prohibited.

According to the Anti-kickback Statute 42 U.S.C. § 1320a-7b(b), no Plan employee or any Network or Representative acting on Liberty Advantage’s behalf shall, in violation of any applicable law, offer or make directly or indirectly through any other person or firm any payment of anything of value (in the form of compensation, gift, contribution, or otherwise) to:

- Any person or firm employed by or acting for or on behalf of any customer, whether private or governmental, for the purpose of inducing or rewarding any favorable action by the customer in any commercial transaction; or any governmental entity, for the purpose of inducing or rewarding action (or withholding of action) by a governmental entity in any governmental matter;
- Any governmental official, political party or official of such party, or any candidate for political office, for the purpose of inducing or rewarding favorable action (or withholding of action) or the exercise of influence by such official, party or candidate in any commercial transaction or in any governmental matter.

In utilizing consultants, agents, sales representatives or others, Liberty Advantage will employ only reputable, qualified individuals or firms under compensation arrangements, which are reasonable in relation to the services performed. Consultants, agents, or representatives retained in relation to the provision of goods or services to the federal government must agree to comply with all laws, regulations, and Liberty Advantage policies governing employee conduct.

The provisions of this section are not intended to apply to ordinary and reasonable business entertainment or gifts not of substantial value, customary in local business relationships

and not contrary to the law as applied in that environment. Managers are expected to exercise sound discretion and control in authorizing such business entertainment and gifts.

When customer organizations, governmental agencies, or others have published policies intended to provide guidance with respect to acceptance of entertainment, gifts, or other business courtesies by their employees, such policies shall be respected.

Political Contributions

Liberty Advantage will not make any contribution to any political party or to any candidate for political office in support of such candidacy except as provided in these Standards and as permitted by law.

In the United States, federal law strictly controls corporate involvement in the federal political process. Generally, federal law provides that no corporation may contribute anything of value to any political party or candidate in connection with any federal election.

While similar laws apply in some states and their political subdivisions, in many jurisdictions in the United States, corporate contributions to candidates and political parties in connection with state and local election campaigns are lawful.

This policy is not intended to prevent the communication of Liberty Advantage views to legislators, governmental agencies, or to the general public with respect to existing or proposed legislation or governmental policies or practices affecting business operations. Moreover, under these Standards, reasonable costs incurred by Liberty Advantage to establish or administer political action committees or activities organized to solicit voluntary political contributions from individual employees are not regarded as contributions to political parties or candidates, where Liberty Advantage may lawfully incur such costs.

Reporting Potential or Detected Noncompliance or Fraud, Waste, and Abuse

Liberty Advantage is committed to complying with all applicable laws, including but not limited to those addressing noncompliance and FWA. Employees are expected to immediately report any potential false, inaccurate, or questionable issues to their supervisors or the Liberty Advantage Compliance Officer in accordance with Liberty Advantage's policies. Any employee who is requested to engage in any activity which is or may be contrary to the intent and spirit of these Standards must promptly report such information to his or her manager, or, if the person was so directed by the manager, then to the Liberty Advantage Compliance Officer.

Likewise, any employee who acquires information that gives the employee reason to believe that any other employee is engaged in conduct forbidden by these Standards must promptly

report such information to his or her manager or, if the manager is engaged in such conduct, then to the Liberty Advantage Compliance Officer.

Liberty Advantage employees can use the following information to submit questions or reports of suspected or detected noncompliance or potential FWA.

Methods for Reporting Potential and Detected Noncompliance and Fraud, Waste, and Abuse (FWA)	
Anonymous Hotline	1-844-317-9059
Confidential E-mail	Compliance@libertyadvantageplan.com
Mailing Address	Compliance Officer Liberty Advantage P.O. Box 2190 Glen Allen, VA 23058

Liberty Advantage does not tolerate fraudulent or other dishonest behavior and will take appropriate and timely investigative and corrective action upon receiving such reports in order to conclude the investigation as applicable within a reasonable timeframe. Liberty Advantage is prohibited by law from retaliating in any way against any employee or contractor who in good faith reports a perceived problem, concern, or issue involving noncompliance or FWA, and will not take punitive action against an employee who reports such information.

Required Training and Education Activities

These Standards describe Liberty Advantage’s expectation that all employees conduct themselves in an ethical manner. To assist employees with understanding potential issues and to comply with CMS requirements, certain training and education activities are required.

Fraud, Waste, and Abuse

Liberty Advantage is committed to the responsible stewardship of our resources, the Medicare fund, and maintaining a comprehensive plan for detecting, preventing, and correcting FWA. To that end, Liberty Advantage requires any individual who is aware of or suspects acts of FWA of Liberty Advantage resources in any departmental area, by any provider, member or other individual, or with any entity that Liberty Advantage contracts with, such as in the Medicare program, to report such acts to the Liberty Advantage Compliance Officer.

In compliance with CMS requirements, all employees must complete the FWA training within 90 days of initial hiring or appointment, and annually thereafter. Job-related FWA training is provided at a department level.

General Compliance

General compliance training will address preventing, detecting, and correcting noncompliance issues; a description of the compliance program; and the requirements for and the methods to, report potential issues of noncompliance; and the assurance to protect confidentiality and anonymity for the reporter. Moreover, such training efforts will highlight that Liberty Advantage adheres to a standard of non-retaliation and non-intimidation for compliance-related questions or reports of potential noncompliance or FWA.

In compliance with CMS requirements, all employees and governing body members must complete general compliance training within 90 days of initial hiring or appointment, and annually thereafter.

Violations of the Standards of Conduct

Violations of these Standards are grounds for discharge or other disciplinary action, adapted to the circumstances of the particular violation and having as a primary objective furtherance of Liberty Advantage's interest in preventing violations and making clear that violations are neither tolerated nor condoned.

Disciplinary action will be taken, not only against individuals who authorize or participate directly in a violation of these Standards, but also against:

- Any employee who may have deliberately failed to report a violation of these Standards;
- Any employee who may have deliberately withheld relevant and material information concerning a violation of these Standards; and
- The violator's managerial superiors, to the extent that the circumstances of the violation reflect inadequate leadership and lack of diligence per the *Disciplinary Standards* policy.

Liberty Advantage Compliance Officer Contact Information

Compliance Officer	Brad Campbell
Phone	1-910-815-3123
Confidential E-mail	BradCampbell@libertyhcare.com
Mailing Address	Compliance Officer Liberty Advantage P.O. Box 2190 Glen Allen, VA 23058

Compliance Hotline and Compliance Contact Information

Phone	1-844-317-9059
Fax	1-800-335-0270
E-mail	Compliance@libertyadvantageplan.com