

Code of Conduct

What you need to know
about compliance, ethics,
and privacy at work.



The world is changing. Our commitment to ethics isn't.

We're on a mission to truly fix health care.
Yes, it's bold. But our organization has
the motivation, the technology, and, most
importantly, the people to drive this change.

To our team members:

Highmark Health's brand stands for trust and confidence. This trust is based on our persistent commitment to our mission: **to create a remarkable health experience, freeing people to be their best.**

The people we serve have been, and always will be, our moral and strategic compass. In a business of trust, we believe behaving ethically, lawfully, and with integrity is the only way to be.

The Highmark Health Code of Business Conduct (referred to as "the Code") provides an overview of the legal requirements applicable to what we do, as well as how to act as corporate stewards to protect our name and reputation. If you observe, learn of, or, in good faith, suspect an action or situation violates a law, regulation, or a Highmark Health policy or any of its entities' policies or procedures, or breaches the standards of conduct defined in this Code, you must report it.

The information contained in this Code is the framework for making business decisions that will ensure we are fulfilling our responsibilities with integrity. Therefore, to encourage all workforce members to speak up when they have questions or concerns or experience wrongdoing, Highmark Health has a non-retaliation or intimidation policy. This means retaliation or intimidation against those who, in good faith, report concerns or wrongdoing to management, to the Enterprise Risk and Governance Division, or to a government agency is prohibited.

Highmark Health provides many resources to assist you. You may contact your leader, Human Resources, or the Enterprise Risk and Governance Division, or utilize the anonymous Compliance Helpline. All questions and concerns will be treated confidentially and will be promptly addressed.

We encourage you to read, become familiar with your responsibilities, and practice the guidance outlined in this Code. Highmark Health leaders have the additional responsibility to make compliance with this Code a vital part of our business. Every member of Highmark Health's Board of Directors and leadership team is fully committed to conducting business according to the Code and in setting the ethical tone of the organization. Thank you for supporting a culture of working with integrity.



David L. Holmberg
President and CEO,
Highmark Health



Joseph C. Guyaux
Chairman of
the Board,
Highmark Health



Melissa M. Anderson
Executive Vice President,
Chief Risk, Audit, and
Compliance Officer,
Highmark Health

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Welcome

At Highmark Health, we are reinventing health care.

The Highmark Health enterprise includes a network of leading companies and health care facilities committed to getting health care right for millions of Americans across all 50 states and the District of Columbia.

Through our diversified portfolio of businesses, the organization's workforce members proudly offer products, services, and solutions that meet the broad spectrum of health care needs of consumers, business customers, and government entities. Our portfolio includes businesses in health insurance, health care delivery, post-acute care management solutions, dental solutions, reinsurance solutions, and innovative technology-based solutions.

Highmark Health and our affiliated companies maintain a strong and historic commitment to the communities we serve, expressed through the philanthropic works of our charitable foundations, through our corporate programs, and our giving and volunteerism.

We recognize that it is not enough to merely comply with laws and regulations. We believe that it is imperative to abide by the highest ethical standards in serving our customers, patients, and communities, and dealing with our fellow workforce members. Therefore, it is important that we do not lose sight of one basic principle of integrity: We care not only for the result, but how it is obtained. This means conducting ourselves with integrity in everything we do. The responsibilities and expectations found in the Code of Business Conduct are not new. Highmark Health's Code of Business Conduct forms the foundation of our ethical culture. In fact, over the years, it has become the cornerstone of Highmark Health's commitment to integrity, one of our values.

All concerns deserve proper attention, no matter how small they are. If you are unsure about what to do in a given situation or feel like something just is not quite right, you are encouraged to consult with your manager or supervisor. You are also encouraged to contact the Enterprise Risk and Governance Division using the resources outlined in this guide. We are counting on your assistance in preserving and strengthening our long-standing tradition as an ethical organization.

Core Behaviors

Our four core behaviors are what we value and how we act each and every day to bring our mission and vision to life.

We place the customer at the center of everything we do.

- We put ourselves in our customers' shoes.
 - We anticipate our customers' needs.
 - We simplify the customer experience.
 - We deliver solutions that go a step beyond.
 - We appreciate our customers' loyalty to Highmark Health.
-

We are driven to create the future of health care.

- We inspire through vision and action.
 - We are proactive in driving change.
 - We are authentic in who we are and what we do.
 - We embrace courageous conversations.
 - We challenge ourselves to continuously improve.
-

We collaborate to achieve shared success.

- We involve the right partners at the right times.
 - We treat each other with honesty and respect.
 - We influence through relationship and not through position.
 - We trust one another to make the right decisions and do the right things.
 - We share risks and rewards.
-

We value outcomes, not activity.

- We set clear priorities and expectations.
- We take ownership of our commitments.
- We take calculated risks.
- We are relentless in our pursuit of excellence.
- We recognize and celebrate results.

CHAPTER 1

Committing to Integrity and Compliance

If you're wondering if all of this applies to you and your role within Highmark Health, the answer is yes. We're all responsible for promoting a culture that encourages ethical behavior and a commitment to comply with applicable federal and state laws, rules, regulations, and local guidance. Not just because we're required to, but because it's the standard we hold ourselves to.

Ethical Leadership and Accountability

Leaders at all levels have the responsibility to set the example by always being role models of appropriate behavior. Ethical leadership at Highmark Health begins with the Board of Directors and senior leaders setting the ethical direction. Our leaders aspire to maintain a corporate culture that not only embraces the principle of doing the right things, but also doing things the right way.

Leaders will maintain a working environment that is free from harassment; coercion of any kind, especially to perform illegal or unethical acts; discrimination; and retaliation. Our leaders must ensure that workforce members, vendors, and contractors have a platform to freely express ethical concerns and provide mechanisms for discussing and addressing such concerns. Leaders are also charged with ensuring that they have sufficient information and resources to maintain compliance with regulatory standards and the Code standards.

Leaders must encourage open communication about ethical and compliance issues that may arise. A vital component of this responsibility is to communicate regularly with each person on your team and to actively promote Highmark Health's values and ethical standards so that all your workforce members, vendors, and contractors understand how the Code and the Integrity and Compliance Program guide them in their decision-making process.

Workforce Responsibilities

Annually, all members of the Board of Directors, officers, and workforce members are required to attest that they have read, understand, and agree to abide by the Code and the policies within their respective organization. Employee attendance and participation in compliance program activities, including fraud, waste, and abuse training, is a job performance expectation and a condition of continued employment.

Additionally, all workforce members are expected to cooperate and assist in the resolution of identified compliance issues. Failure to do so may result in disciplinary action up to and including termination of employment. Highmark Health provides information and training to all workforce members so that they understand fraud, waste, and abuse laws including the False Claims Act, whistleblower protections, and the role workforce members play in the organization's compliance program. By committing to these responsibilities, we will continue to meet the expectations of conducting our business with integrity.

Vendors' Responsibilities

Highmark Health seeks to partner with those who share our values and ethical standards. Contractors, vendors and their workforce members, agents, and subcontractors are expected to support the standards of conduct as described in this Code and to demonstrate adherence to Highmark Health's commitment to ethical business practices.

Contractors and vendors working with or on behalf of Highmark Health are obligated to conduct business activities and interactions ethically and in full compliance with applicable federal, state, and local laws, regulations, and contractual obligations; avoid actual or perceived conflicts of interest while doing business on behalf of Highmark Health; protect, use, and disclose confidential information only as permitted or required by law and their contract with Highmark Health; and report any questionable behavior, potential violations of this Code, or suspected fraud, waste, and abuse to the Highmark Health Enterprise Risk and Governance Division.

Compliance Officer and Enterprise Risk and Governance Division

The Compliance Officer is appointed by and has direct access to the Board of Directors of Highmark Health, has overall responsibility for the Highmark Health Integrity and Compliance Program ("the Program"). The Enterprise Risk and Governance Division is responsible for administering the Program under the direction of the compliance officer. The Compliance Officer and Enterprise Risk and Governance Division staff are available to offer guidance and support for ethics or compliance questions or concerns.

CHAPTER 2

Conducting Business

Highmark Health is revolutionizing health care. Help us do that by serving our community and conducting business with honesty and integrity.

Our customers include patients; individuals; local, state, and federal government; and public and private businesses. They expect our products and services to live up to our mission: to create a remarkable health experience, freeing people to be their best. We must deliver on this promise in every single interaction with them.

Commitment to Quality Patient Care

Our primary mission is to make high-quality health care accessible, understandable, and affordable. We treat all patients with respect and dignity and provide care that is both necessary and appropriate. We will respect and support each patient's right to competent, considerate, and courteous treatment or service within our capacity without discrimination due to sex, race, disability, age, religion, veteran status or military status, color, creed, national origin, ancestry, sexual orientation, or source of payment for care. While we strive to render care in an efficient manner, clinical care decisions are not based on patient financial means or business economics.

Please see the following content for more information on PolicyWeb:

- Civil Rights/Nondiscrimination in the Provision of Health Related Services for AHN
- 13.26 Nondiscrimination Grievance Highmark Health/Highmark

We provide treatment environments where patients and their families understand their individual illnesses and make informed decisions concerning their medical care. Each patient or patient representative receives a clear explanation of care, including a diagnosis, a treatment plan, and an explanation of the risks and benefits associated with each available treatment option or with no treatment. We inform patients of their right to make advance directives regarding treatment decisions, financial considerations, and the designation of a surrogate decision-maker for health care.

We believe all health care services or items recommended should be medically necessary as determined by the accepted professional standards of the relevant health professional. Medical necessity is the standard for making all care decisions and we believe that all patients have the right to be involved in all aspects of their care. Therefore, we encourage patients' participation in the development of their plan of care. Furthermore, we provide patients with sufficient information through the informed consent process for surgery and other significant or invasive treatments or procedures.

Trained Professionals

We contract with and employ health care professionals with appropriate credentials, experience, and training to meet our patients' needs. Only licensed and, where applicable, credentialed/privileged personnel will perform clinical assessments and procedures or will be supervised by those who are. All health care practitioners shall be duly licensed or certified and shall only provide health care services or items to patients within the scope of their license and/or credentials/privileges. All providers and health care professionals are expected to be current with their respective privileges by maintaining their licenses/certifications/boards or other credentials, as applicable and through relevant educational training and teaching experiences.

Research Compliance

The AHN Research Institute oversees all human and animal research activities conducted at Allegheny Health Network (AHN).

Research with human subjects has proven invaluable in advancing knowledge in biomedical, behavioral, and social sciences. Such research is strictly regulated, with laws at the federal, state, and local levels. Further, professional societies have developed discipline-specific standards, policies, and guidelines to protect research subjects and to maintain the integrity of the research.

Research must be conducted in strict conformity with the applicable policies, research procedures and approvals, and requirements of all governmental and private research sponsors, as well as compliance with federal, state, and local laws.

- Billing for clinical research subjects shall conform to AHN Research Institute policy, regulations, and laws.
- AHN Research Institute policies provide local guidance for compliance with federal, state, and local laws and regulations, including protection of the rights and safety of research participants, possible conflicts of interest and/or commitment, regulatory noncompliance, and scientific misconduct.

Proper Use of Company Assets

By using Highmark Health assets only for business-related purposes, we can deliver products and services more efficiently and cost effectively. Company assets include such things as equipment, including computers and phones, materials inventory, medical devices and supplies, corporate funds, and office supplies, as well as intangible items such as concepts, business strategies and plans, customer and patient information, financial data, intellectual property rights, and other business information. Highmark Health workforce members, officers, and members of

its Board of Directors are prohibited from using company assets, property, information, or positions for personal gain.

Communications delivered via corporate systems are not private and are, as such, subject to management review and can be subpoenaed to serve as evidence in a court of law.

What are some examples of company assets?

- Computer hardware and software
- Copiers and scanners
- Telephones and voicemail systems
- Email, intranet, and internet access
- Office supplies
- Buildings and fixtures

Company assets may not be used for:

- Personal gain
- Solicitation of personal business
- Harassment of any type
- Sexually explicit material
- Communications that are inappropriate, inflammatory, or derogatory
- Illegal activity
- Activity which violates corporate policies, procedures, or standards

Proper Use of Company Brand and Logos

Our brands and logos are vital to the Enterprise. For example, there are strict usage guidelines regarding the use of our brand in accordance with the Blue Cross and Blue Shield Association licensee rules as well as the Blue brand strategy. Contact the Legal Department for guidance. For additional information, please refer to 07.06 Corporate Brand Compliance on PolicyWeb.

Accurate and Timely Records and Financial Reporting

Our patients and customers depend on Highmark Health to maintain and provide accurate information. Maintaining information and records accurately and completely is vital to the success of Highmark Health's businesses. A record is defined as a book, document, or any other data, regardless of the type or form. A record may be written or electronic including emails. Records may contain financial, clinical, operational, or safety data.

Documentation of accurate medical charts allows health care practitioners to provide high-quality care to our patients. Our billing practices comply with all applicable federal and state payer requirements as well as all private payer contracts and agreements. We shall not submit claims that contain information known to be false or unsupported by the medical record.

We are obligated to accurately and truthfully document our work and to not make false or misleading oral or written statements regarding such work. Highmark Health workforce members, officers, and members of its Board of Directors are prohibited from taking any action to manipulate, mislead, coerce, or inappropriately influence any independent auditor engaged in an audit of the financial statements of any Highmark Health organization.

When preparing source documents for financial transactions, it is important to provide accurate information so that costs can be allocated to the appropriate product lines. No payment may be approved or made with the intention or understanding that any part of the payment is to be used for a purpose other than company business. Failure to maintain accurate books and records may expose Highmark Health to significant fines, as well as civil and criminal penalties.

Contracts and subcontracts on government projects often require Highmark Health to submit various certifications. These contracts usually contain clauses wherein Highmark Health is required to make affirmative representations about a variety of matters in addition to financial data, such as compliance with socioeconomic programs, contract specifications, environmental laws, and various procurement regulations. These certifications and representations are serious matters. Highmark Health relies upon the truthfulness and accuracy of the information it receives from its workforce members, vendors, contractors, and covered personnel when it submits these certifications.

It is a criminal offense to destroy records that are subject to a subpoena or government investigation. Records must be maintained in accordance with departmental and corporate records' retention guidelines and must not be destroyed before the prescribed retention period has expired or until threatened or pending litigation or government investigations are concluded. In addition, always check with your manager, the Enterprise Risk and Governance Division, and/or the Legal Department to determine if the records are the subject of a Legal Hold Notice. Records that are the subject of a Legal Hold Notice must continue to be preserved and may not be altered or destroyed without approval from the Legal Department, even if the regular retention period that would otherwise apply to such records has expired. For additional information, please refer to 23.03 Enterprise Records Management on PolicyWeb.

Fair Dealings

Customer and supplier relationships should be based on the cost and the quality of the products and services and should not be influenced by personal relationships. Those of us involved in the purchasing or bidding process must ensure that communications and representations made to prospective suppliers and customers are true and accurate.

In addition, we shall not take unfair advantage of our customers and suppliers through manipulation, coercion, misrepresentation of information, or abuse of privileged information.

Conflicts of Interest

Conflicts of interest may arise when outside personal interests, employment, or affiliations influence or create the appearance of influencing business decisions. Business affiliations and financial interests by immediate family members or by persons with whom a workforce member, officer, or member of the Board of Directors has a close personal relationship may also create a possible conflict of interest. To view the enterprise policy on Conflicts of Interest, please see Enterprise Conflict of Interest on PolicyWeb.

Gifts, Gratuities, and Entertainment

It is the policy of Highmark Health to preserve integrity and objectivity in dealing with patients, customers, vendors, auditors, government personnel, and others with whom the organization conducts business. Workforce members must be free from influence created by unauthorized gifts or business entertainment. To view the policy on gifts, gratuities, and entertainment in its entirety, please see 13.18 Enterprise Gifts and Entertainment on PolicyWeb.

Non-Monetary Compensation/Business Courtesies and Incidental Benefits Provided to Physicians

The linked policy is intended to provide direction on the internal and external requirements governing Non-Monetary Compensation/Business Courtesies to physicians and/or to their immediate family members: refer to Non-Monetary Compensation/Business Courtesies and Incidental Benefits Provided to Physicians on PolicyWeb.

Speaker Programs and Transparency (Sunshine Act)

The Physician Payments Sunshine Act (Sunshine Act) requires pharmaceutical and medical device companies to publicly report payments and other transfers of value they make to physicians and teaching hospitals. This means that any payments physicians receive — from speaking fees and consulting to research grants, travel reimbursements, meals, gifts, and royalties — must be reported. Providers must continuously monitor their interactions with pharmaceutical and medical device companies to ensure all relevant payments and transfers of value are accurately captured and reported. The goal is to increase transparency and reduce potential conflicts of interest. Please contact Enterprise Risk & Governance for questions related to the Sunshine Act.

Marketing and Advertising

Highmark Health uses marketing and advertising activities to educate the public and increase awareness of our products and services, and to provide information to the community.

Highmark Health will present truthful, fully informative, and nondeceptive information in these materials and announcements. All advertising material content must be clear, honest, and fair.

The Centers for Medicare and Medicaid Services (CMS) imposes certain requirements related to the advertising, marketing, and enrollment of current member and prospective members in Medicare Advantage and prescription drug plans, Medicaid plans, and Children's Health Insurance Program (CHIP) plans. Individual state Medicaid contracts include additional regulations that must be adhered to, as well. Applicable federal and state laws must be adhered to at all times.

Public Representation of Highmark Health

When communicating publicly, you must be cognizant of keeping your personal views separate from communications you make and actions you take on behalf of the company.

Communications with Government Officials

Workforce members who are part of personal membership groups (examples include, but are not limited to, local or state medical societies, specialty physician societies, pharmacist trade association, etc.) and are planning to participate in an advocacy action on behalf of that trade group must notify the Government Affairs Department. For example, an employee who is called to testify or write a letter in support or opposition of regulation is not permitted to represent the company in any form unless expressly permitted by Government Affairs. For more information, please see 22.02 Communications with Government Officials on PolicyWeb.

Interacting with the Media

To ensure that the views of Highmark Health are accurately depicted and appropriately and consistently represented in public, and to comply with applicable laws and corporate policies, procedures, and standards, all news media communications must be coordinated through Corporate Communications and Public Relations. You should not be interacting directly with the media on behalf of Highmark Health. You should not be interacting directly with the media on behalf of Highmark Health or AHN. For additional information for Highmark Health, please refer to 07.07 Communications to News Media on PolicyWeb. For additional information on communications regarding media communications for AHN, please see News Media Relations on PolicyWeb.

Participating in Social Media

Participation in social media on behalf of the company must be coordinated through Corporate Communications and Enterprise Social Media. For additional information, please refer to 07.09 Enterprise Social Media on PolicyWeb.

Endorsing Other Organizations or Products

As a general rule, Highmark Health directors, officers, and workforce members shall not provide testimonial statements that could be used as an advertisement for suppliers or their products unless supported by Highmark Health. If you receive a request for an endorsement of an external entity, you must consult with the Enterprise Risk and Governance Division before you respond to such request. For the purpose of this Code, an endorsement means any promotional message reflecting opinions or experiences of a third party's services or products that the third party could use for advertising purposes. References provided for suppliers in the ordinary course of business are not considered endorsements.

Gathering Information About Competitors

Obtaining public information about other organizations, including our competitors, through legal and ethical means such as public documents, public presentations, journal and magazine articles, and other published information is not unusual nor is it restricted. We are not permitted to use and should always avoid using improper means, such as misrepresentation, theft, bribery, or improper infiltration to gather competitive intelligence.

CHAPTER 3

Protecting Highmark Health's Information

Our customers, clients, and patients trust us with some of their most personal information and data. Highmark Health has strict policies, procedures, and standards in place to protect that confidential information. It is crucial that you follow these safeguards for the protection of our company and customers.

We must safeguard all of the company's Confidential Information, including, but not limited to, Protected Health Information (PHI), Personally Identifiable Information (PII), Proprietary/Trade Secret Information, and Competitively Sensitive Information (CSI). All of us must strive to prevent improper use or disclosure of, or access to, that information. Even after our employment ends, certain obligations remain in effect, as outlined in the agreements we signed when we began employment. For additional information, please refer to Privacy & Confidentiality of Information Policy; 16.04 Information Use, Management & Disclosure policy; and 13.30 Citizenship and Global Delivery on PolicyWeb.

All information that is maintained by the company is classified into three major categories: Public Information, Government Information, and Confidential Information. The information within each category is subject to specific data-sharing requirements and approval processes.

- 1. Public Information:** Public information represents all information created or received by the company that is generally found in the public domain and is not otherwise sensitive, confidential, classified, or secret. There are no special use or disclosure requirements regarding this information.

2. **Government Information:** Most of the information relating to government contracts is government property. Certain government contracts prohibit the use of government-owned information or data to further Highmark Health's private business endeavors. Release of such data, even to our own subsidiaries, without the permission of the relevant government entity is not permitted.
3. **Confidential Information:** Confidential information includes information either generated by the company or made available to the company for purposes of conducting its business operations. Confidential information is further subdivided into the following categories: financial information, human resources information, group customer account information, proprietary information, provider information, CSI, PHI, PII, and personal data (under the European Union [EU] General Data Protection Regulation [GDPR] and the California Consumer Privacy Act [CCPA]). Please refer to the Highmark Health Data Ethics, Policy, and Privacy Handbook for additional information regarding the different categories of information and the requirements for protection during use, storage, and release of information.

Intellectual Property and Research

Intellectual property (IP) refers to intangible assets, rather than physical assets such as buildings, real estate, and equipment. IP includes patents and potentially patentable inventions, copyrights, trademarks, and trade secrets. Highmark Health has entity-specific policies and procedures which address IP and allow us to be competitive and constantly improve how we prevent, diagnose, and treat illness. For more information on Intellectual Property, please see Intellectual Property on PolicyWeb.

Highmark Health (or a third-party sponsor, if applicable) owns all IP rights in all inventions and copyrightable works that any workforce members, contractors, or students of AHN: (a) creates with use of resources of Highmark Health entities; or (b) creates that relates to their regular duties at

Highmark Health; or (c) develops under a federal funding contract or grant and that involves Highmark Health entities, including but not limited to their facilities; or (d) develops under any funding agreement with a third-party sponsor and that involves Highmark Health entities, including but not limited to their facilities; or (e) develops using any philanthropic funds provided to Highmark Health entities.

Reporting Phishing and Other Security Incidents

Phishing attacks are a constant threat to company data and are becoming increasingly sophisticated, as well as costly to mitigate. Workforce members who click on a malicious link can be responsible for data loss, financial loss, and reputational damage to the company, which could lead to disciplinary action, as well as put the employee's personal information at risk. If they believe they might have clicked on a phishing email or link, immediately report it to **phishing@highmark.com**.

Each individual in the company, from the CEO to the junior-most employee, must share the responsibility to avoid becoming the victim of a phishing scam. Immediately report suspected phishing emails by forwarding the email to **phishing@highmark.com**, or by pressing the **Report Phishing** button in company email systems (e.g., Outlook) to safeguard the company's digital assets.

Personal Use

Authorized users, defined as any person to whom the company has granted a unique user identification to gain access to the company's systems, should only use Highmark Health assets for business-related purposes. Highmark Health's information systems may never be used for personal gain or profit. The use of external personal email accounts (e.g., Hotmail, Gmail, Comcast, Verizon) to conduct company work or transmit company information is prohibited.

No Expectation of Privacy

Authorized users have no legitimate expectation of privacy regarding any communication that they create, receive, or store in Highmark Health's assets and systems, including, but not limited to emails, instant messages, and photographs. Authorized users should be aware that all information created or stored on the company's information systems is the property of Highmark Health, and is subject to monitoring and auditing. The company cannot and does not guarantee the privacy or confidentiality of any personal (i.e., non-business-related) information stored on Highmark Health's information systems. Personal (i.e., non-business-related) information that is intended to remain private and/or confidential should therefore not be created or stored in Highmark Health's systems.

Monitoring

All activity conducted on the network is monitored. Highmark Health maintains the absolute right to monitor all information used by any party, whether authorized or unauthorized, for any purpose, and particularly to ensure proper working order, to assure appropriate use, and to maintain the security and integrity of the company's information. Highmark Health may retrieve the contents of any communication or file created or stored on the company's systems.

Highmark Health may access any authorized user's files, including archived material of present and former authorized users, without the authorized user's consent, for any purpose deemed appropriate by the company.

Acceptable Use of Electronic Communication and Information

The company's information systems are the exclusive property of Highmark Health and are to be used for business purposes only. Highmark Health has established rules and guidelines that govern acceptable access to and use of Highmark Health information systems, which includes computers, mobile devices, cloud environments, network equipment, software applications, telephones, and internet capabilities. The guidelines apply to any person whom Highmark Health has identified as an authorized user. An authorized user is any person to whom Highmark Health has granted a unique user ID so that the person can use Highmark Health's computer network equipment and, by virtue of the assigned user ID, gain access to Highmark Health's network systems.

For example, authorized users must take steps to prevent unauthorized access to their accounts by logging off or locking their workstations or logging out of or securely locking business or clinical applications when their computer will be unattended, consistent with the corporate policy on 14.05 Acceptable Use of Electronic Communication & Information, which can be found on PolicyWeb.

Acceptable and Impermissible Content

Authorized users must exercise good judgment and professionalism when creating, editing, publishing, storing, or transmitting content on or from Highmark Health's systems. This applies to all systems and applications, including but not limited to email, instant messages, video, audio, images, or pictures.

For more information, please review the corporate policy regarding acceptable use of electronic communication and information.

Responsible Use of Artificial Intelligence (AI)

The people we serve trust us to protect their private and personal data. Our team members and partners expect us to keep their private information safe, and there is data critical to our competitive advantage that we cannot risk leaking externally. It is our obligation to take all precautions to safeguard this information. This includes using company approved AI and generative AI (“GenAI”) tools responsibly and in accordance with our “Human at the Helm” approach to leveraging AI capabilities across the enterprise. The use of Confidential Information in a publicly available generative AI tool on your work device is prohibited. Likewise, confidential data may not be entered in a publicly available generative AI tool or application installed on your personal device. Refer to the Artificial Intelligence (AI) Use Policy on PolicyWeb for more information.

Privacy Resources

Additional information related to protecting Highmark Health’s information can be found in the Highmark Health Data Ethics, Policy, and Privacy Handbook or by contacting the Privacy Legal Team at [**privacy@highmarkhealth.org**](mailto:privacy@highmarkhealth.org).

CHAPTER 4

Complying with Legal and Regulatory Requirements

Whether you're a workforce member, vendor, or contractor, everything you do at Highmark Health must be done according to applicable laws, rules, regulations, and contractual obligations. We are required to obey all applicable laws, including United States laws that have application outside of the United States and foreign laws that have application within the United States. If you violate these laws, rules, or regulations, not only do you open up Highmark Health to civil or criminal liability or loss of business, but you may also be subject to individual, civil, or criminal liability.

This Code provides general direction on a broad range of issues; however, it is not intended to address every law and regulation in existence or in the future that could impact our jobs or Highmark Health.

Because of the wide range of health care services we provide, separate policies and procedures specific to the various operations of physician practices and hospital operations have been adopted. These policies and procedures are more specific and may be more stringent than the standards set forth in this Code. For example, the Department of Health or Joint Commission may require specific procedures that are not addressed in this Code but are detailed in the separate policies and procedures maintained by your department.

Competition and Antitrust Laws

The United States antitrust laws are designed to create a level playing field in the marketplace and to promote fair competition. Federal and state antitrust laws are intended to encourage such competition by prohibiting agreements that restrain trade, such as agreements by competitors regarding the price they will charge for their products. Other practices limiting competition, such as agreeing on product characteristics, dividing up markets, “rigging” bids or manipulating the bidding process for contracts, and agreeing to boycott competitors or suppliers, may also violate the antitrust laws.

Under antitrust laws, competitors may not make agreements on the prices they will charge for products or services, the territories in which each company will sell products, customers to whom each company will offer its products or services, how much they will pay workforce members, the sale of only certain types of products or services, or the amount of any product each company will produce or offer for sale in the marketplace. In addition, competitors may not agree on the use or nonuse of suppliers or on any contract terms and conditions except in the context of participating in a group purchasing organization that complies with all regulatory requirements.

Tying arrangements exist when one company conditions the sale of goods or services on the purchase of some other, unrelated good or service. In certain circumstances, antitrust laws prohibit these arrangements. Seek guidance from the Legal Department with any questions or concerns.

Members of trade associations and other industry groups are, by their very nature, competitors. You must be particularly sensitive about trade association activities that might be construed as leading toward an agreement concerning prices or services and should contact the Highmark Health Legal Department for advice when you have questions or concerns.

Detecting and Preventing Fraud, Waste, and Abuse

Highmark Health is committed to preventing, detecting, correcting, and reporting fraud, waste, and abuse committed either internally or externally against government entities, as well as against the company. For additional information, please refer to 13.20 Enterprise Fraud, Waste & Abuse on PolicyWeb.

Emergency Medical Treatment and Labor Act (EMTALA)

We comply with the provisions of the Emergency Medical Treatment and Labor Act (EMTALA). For additional information, please refer to Emergency Medical Treatment and Labor Act (EMTALA) on PolicyWeb.

Controlled Substances

Certain licensed practitioners employed by Highmark Health are registered to purchase, acquire, and dispense narcotics and other controlled substances. Improper use of these substances is illegal and extremely dangerous. Highmark Health complies with all federal and state laws regulating controlled substances.

Access to controlled substances is limited to persons who are properly licensed and who have express authority to handle them. No health care practitioner or researcher may dispense controlled substances except in conformity with state and federal laws and the terms of the practitioner’s license.

The unauthorized manufacture, distribution, use, or possession of controlled substances by Highmark Health workforce members, vendors, or contractors is strictly prohibited.

All workforce members, vendors, or contractors who know of any unauthorized handling of controlled substances should provide such information immediately to their supervisor or the Enterprise Risk and Governance Division. For additional information, please refer to 20.04 Alcohol & Drug Abuse Policy on PolicyWeb.

Compliance with Human Rights Laws

Highmark Health fully supports the elimination of human trafficking and the advocacy of human rights for all individuals. Highmark Health believes that respecting human rights and rejecting human trafficking are essential to our operations. In addition, certain of our U.S. Government contracts require that we comply with Federal Acquisition Regulation (FAR) 52.222-50 entitled “Combating Trafficking in Persons.” Highmark Health must adhere to regulations prohibiting human trafficking and comply with all applicable local laws in the country or countries in which they operate. For additional information, please see 20.63 Combatting Trafficking in Persons Policy on PolicyWeb.

Anti-Kickback Statute

The Anti-Kickback Statute makes it a crime for any person to knowingly and willfully offer or pay any remuneration, directly or indirectly, overtly or covertly, in cash or in kind, to induce a person to make referrals for services that may be covered by a federal health care program or to purchase, lease, order, or arrange for or recommend purchasing, leasing, or ordering any services that may be covered by a federal health care program. Please see Non-Monetary Compensation/Business Courtesies and Incidental Benefits provided to Physicians on PolicyWeb, for more information related to Anti-Kickback.

Stark Law

The Stark Law prohibits a physician from making referrals to an entity for the furnishing of Designated Health Services (DHS), which include inpatient and outpatient hospital services, clinical laboratory, and radiology if the physician or an immediate family member has a financial relationship (ownership or compensation) with the entity (unless an exception applies). Further, the entity may not submit a claim to or bill for DHS furnished services pursuant to a prohibited referral, and no payment may be made under Medicare for DHS furnished services pursuant to a prohibited referral.

Because these laws and the accompanying safe harbor provisions are complex, leaders must follow Highmark Health and its subsidiaries’ policies when contracting with or offering/accepting anything of value to/from a physician or a physician’s immediate family member. You should refer any questions/concerns regarding a specific transaction to the Highmark Health Legal Department.

Export Restrictions

Workforce members involved with the export or re-export of goods and services must be familiar with and follow the regulations of those countries where any subsidiary conducts business. Workforce members are responsible for knowing with whom they are transacting business and must not facilitate business with entities or individuals specifically prohibited by law, or with countries that may fall under comprehensive trade embargoes or economic sanctions. Workforce members should seek guidance from the Highmark Health Legal Department concerning export or re-export of goods and services, including transactions involving a foreign subsidiary, if they have any questions or concerns.

Anti-Boycott

Any subsidiary that conducts international business must also comply with the anti-boycott requirements of the Export Administration regulations. These anti-boycott requirements prohibit certain conduct and actions that further boycott or restrict trade practices not supported by the United States, such as agreeing to boycott terms and conditions in a transaction. Generally, we are required by law to report a request to participate in an unapproved boycott to the United States government.

Political Activities

Federal law restricts the use of corporate funds in connection with federal elections. There are similar laws in many states governing state and local elections. Highmark Health is generally prohibited from using company resources or facilities to support fundraising activities of candidates for office.

In addition, personal, company, or affiliate contributions to political candidates, campaigns, and other donor solicited events in markets where the company conducts business may be subject to pre-clearance, legal limitations, attribution rules, and disclosure. Please see 22.03 Political Campaign Contributions and Activities on PolicyWeb for information related to Political Activities.

CHAPTER 5

Complying with Government Program Requirements

Certain Highmark Health subsidiaries are government contractors under both federal and state contracts. In the course of your employment, you may directly or indirectly perform services or work related to one or more of these contracts.

Be aware of any additional requirements and obligations imposed by the government when you're performing services related to any of these contracts. We go above and beyond the minimum requirements for legal and regulatory compliance to make sure we avoid impropriety. Regardless of your role, it's important to know what our legal and regulatory obligations are in these situations.

Government Investigations and Interacting with Government Personnel

Appropriate handling of government investigations is very important, both for Highmark Health and its workforce. For additional information, please refer to Government Investigations on PolicyWeb for more information.

Bidding on Government Contracts

When bidding on or negotiating federal or state contracts, Highmark Health is subject to specific legal requirements. For additional information, please see Business Inclusion Sourcing Policy on PolicyWeb.

Procurement Compliance

Highmark Health's subsidiaries and affiliates who are government contractors must adhere to a variety of government procurement laws and regulations such as prior notification and approval when amounts exceed certain dollar thresholds or when certain subcontracting requirements are met. For additional information, please refer to 18.90 Procurement on PolicyWeb.

Making Claims, Statements, and Representations to the Government

Contracts and subcontracts on government projects often require Highmark Health to submit various certifications. These contracts usually contain clauses wherein Highmark Health is required to make affirmative representations about a variety of matters in addition to financial data, such as compliance with government programs, contract specifications, environmental laws, and various procurement regulations. These certifications and representations are serious matters. Highmark Health relies upon the truthfulness and accuracy of the information it receives from its workforce members and covered personnel when it submits these certifications.

It is a violation of federal laws to knowingly make fraudulent claims or misleading statements to the government or to alter documents being processed in connection with claims against or with the government. A violation of these federal laws can lead to severe civil and criminal penalties against the individual and the company, and can lead, among other things, to sanction, debarment, or exclusion penalties.

It may also be a potential violation of federal law if an employee makes little or no effort to validate the truth and accuracy of statements, representations, or claims, or otherwise acts in a reckless manner as to the truth even if the individual is unaware that the data or information is false, or deliberately avoids finding out whether the statements, representations, or claims are true or false. Government officials rely on the accuracy of verbal and written statements of Highmark Health and its workforce members. These "statements" could include formal certifications, reports, or responses provided during audits and applied to conversations with government representatives. In every instance, it is the obligation of Highmark Health and all of its workforce members to provide accurate and complete statements to the government.

Allocating Appropriate Costs to Government Contracts

A cost that is a legitimate business expenditure for Highmark Health's subsidiaries and affiliates may be considered an unallowable cost under our contracts with the federal government. Under some government contracts, Highmark Health's subsidiaries and affiliates must certify that our cost submissions do not contain any unallowable costs.

We must charge all direct and indirect costs accurately to the appropriate contracts in accordance with the guidelines specified under the respective contract. Inflating time reporting or individual or department workload statistics is strictly prohibited as these statistics are often used as the basis to determine the cost allocation.

Hiring Former and Current Government Employees

The federal government regulates the employment activities of current and former government employees in order to restrict a company from gaining an unfair competitive advantage by hiring a current or former government employee.

The terms of these restrictions vary according to the employment status and function of the government employee and what the employee's role will be at Highmark Health. These restrictions can last for varying periods of time from one year to a lifetime.

It is Highmark Health's policy to comply with all laws concerning the recruitment and employment of former and current government employees, either as employees or consultants. Before entering into employment discussions or negotiations with former or current federal, state, or local government employees, legislators, or members of their immediate families, whether initiated by you or them, seek approval from Highmark Health Human Resources and the Highmark Health Legal Department.

Mandatory Disclosure Requirement

Contractor business ethics compliance program and disclosure requirements obligate federal contractors to disclose certain violations to the government. These provisions state that the agency suspension and debarment official may suspend or debar a contractor if it is determined that there was a knowing failure by a principal of the contractor of timely disclosure to the government, in connection with the award, performance or closeout of a contract or subcontract thereunder, credible evidence of (a) a violation of federal criminal law involving fraud, conflict of interest, bribery, or gratuity violations in Title 18 of the U.S. Code; (b) a violation of the civil False Claims Act; or (c) significant overpayments on the contract.

As federal government contractors, certain Highmark Health subsidiaries are obligated to timely disclose to the government, in writing, information regarding credible evidence of the conduct described above. For the purpose of this disclosure requirement, the term "principal" means an officer, member of the Board of Directors, owner, partner, or a person having primary management or supervisory responsibilities within a business entity (e.g., general manager, head of subsidiary, division, or business segment, and similar positions).

Prompt disclosure of all known facts and circumstances is to be made to the Enterprise Risk and Governance Division to enable Highmark Health to properly assess such information and to determine whether it has an obligation to further investigate and/or make a disclosure to the government.

Dealing with Excluded or Ineligible Persons

Highmark Health is prohibited by law or contractual provision from entering or maintaining certain relationships with individuals or entities that have been excluded from participation in federal health care programs. For additional information, please refer to 13.15 Exclusion Screening for Ineligible Individuals and Entities on PolicyWeb.

CHAPTER 6

Maintaining a Safe, Respectful, and Dignified Working Environment

Highmark Health is committed to maintaining a safe, positive, and healthy environment for all of our customers, business partners, and fellow workforce members.

Differences in backgrounds and experiences that each individual brings to Highmark Health are to be respected, as it is those differences that bring value to the company. As one of our guiding principles, we are expected to treat all people we encounter with professional respect and courtesy, regardless of their position, race, age, sex, religion, national origin, ancestry, creed, sexual orientation, mental or physical disability, veteran status, or any other status or condition protected by law, or other differences and we should expect the same level of respect in return whether they are our coworkers, patients, customers, or suppliers.

For additional information, please refer to these policies on PolicyWeb: 20.11 Employment & Equal Opportunity; 20.01 ADA (Americans with Disability Act) Accommodation Policy; and 20.16 Harassment & Unwelcome Conduct.

Safe and Healthy Environment

We have the right to a safe and healthy work environment, free of illegal drugs, alcohol, and workplace violence. Highmark Health will not tolerate actions or threats by anyone who disrupts business activities or places our patients, customers, workforce members, vendors, contractors, suppliers, or visitors at risk of harm. Possession of weapons, firearms, firearm ammunition, firearm replicas, or firearm components on owned or leased company property, regardless of whether the workforce member, vendors, and contractors possess a license to carry, is prohibited (unless required by their position as an employed police officer).

If you have a concern for your own or someone else's safety, please contact the Corporate Security and Employee Safety Department. Workplace safety also extends to our physical work environment. It is, therefore, important that you identify and promptly report any condition that could create a physical hazard in your area to the Corporate Security and Employee Safety Department. For more information, please refer to PolicyWeb, Lethal Weapons.

Sustainability

Our commitment to a healthy environment extends beyond the walls of our buildings. At Highmark Health, we know that creating a healthy environment helps to create healthier people. We are committed to being responsible corporate citizens by being active in the communities where we do business. We strive to make our communities stronger and healthier places to live through employee volunteerism, corporate philanthropy, and eco-friendly business practices to protect the environment.

CHAPTER 7

Seeking Advice and Reporting Concerns Without Fear of Reprisal

If you have concerns about suspected misconduct, you have an obligation to speak up and report it. While we do everything we can to keep information confidential, there are some cases where information may be shared as required by law.

Call our anonymous helpline to make a report: **1-800-985-1056**.

Types of Suspected Misconduct That Should Be Reported

Some examples are:

- Submitting false timesheets or expense reports.
- Identifying an overpayment.
- Lying or not cooperating during an investigation.
- An ethical dilemma or suspected violation of the Code.
- Policy violations.
- Knowledge of real or suspected privacy violations.

Personal Obligation to Report

It is important to remember that the designation of a Compliance Officer and the existence of an Enterprise Risk and Governance Division in no way diminishes your individual responsibility to comply with laws and regulations, the integrity process, the Code, and related policies and procedures. In carrying out our day-to-day business activities, we need to be sensitive to situations that could lead us or others to violate the Code or other Highmark Health policies. If you are aware, or become aware, of a potential or actual violation of the Code, you must report it to management or the Enterprise Risk and Governance Division as soon as possible.

If the potential or actual violation of the Code involves your immediate supervisor, you must report it to the next highest level of management or the Enterprise Risk and Governance Division. Failure to report a violation of the Code may subject you to disciplinary action.

Disciplinary or corrective action in response to substantiated allegations is an integral part of the Highmark Health Integrity Process. Knowledge of a possible violation of a law that is not reported may result in disciplinary action or termination of a contractor or vendor business relationship.

You are expected to fully cooperate with inquiries made by the Compliance Officer or the Enterprise Risk and Governance Division and respond completely and truthfully to any and all questions. You must refrain from discussing such inquiries with others to protect ourselves, the accused, and the integrity of the investigation.

Protection from Retaliation and Intimidation

Highmark Health maintains a reprisal-free environment and has a policy of non-retaliation and non-intimidation to encourage workforce members, vendors, and contractors to raise ethical or legal concerns in good faith. For additional information, please refer to 20.20 Non-Retaliation on PolicyWeb.

Conclusion

If you see something that violates our Code of Conduct, say something. Use the resources on the next page to make an anonymous report. Thank you for helping us maintain Highmark Health's integrity and brand reputation.

Making a Report

If you choose to make an anonymous report, you should provide enough information about the situation to allow us to properly investigate it. If you do not provide enough details, our ability to pursue the matter will be limited.

All reports will be promptly investigated and, when necessary, appropriate actions will be taken to reduce the potential for reoccurrence and to ensure ongoing compliance. Depending on the circumstances, corrective actions may include changes in business processes, employee coaching, or disciplinary actions.

All matters will be handled with the appropriate level of confidentiality. However, if a matter necessitates the involvement of law enforcement, information may be shared as required by law.

In order to receive status updates on the matter or to provide additional information, you are encouraged to re-contact the Enterprise Risk and Governance Division, referencing the matter you have reported.

Amending the Code

Highmark Health reserves the right to modify the Code at any time when determined necessary. The most current version of the Code is always available on Highmark Health's websites.

Contact

You should speak with your supervisor or manager or contact the Enterprise Risk and Governance Division by any one of the following methods:

| | |
|---------|---|
| CALL | Anonymous Reporting Helpline Toll-free, 24/7: 1-800-985-1056 AHN workforce: 1-877-867-7325 |
| EMAIL | integrity@highmarkhealth.org integrity@highmark.com compliance@ahn.org |
| MESSAGE | Click below for the Secure Message Platform: highmarkhealth.org/hmk/responsibility/integrity/contact.shtmlv |

When contacting the Enterprise Risk and Governance Division:

- You will be treated with dignity and respect.
 - You do not have to give your name.
 - No caller ID is used when calling the toll-free Integrity Helpline number.
 - All matters will be handled with the appropriate level of confidentiality.
 - Your questions or concerns will be promptly reviewed and addressed.
 - You will be protected from any form of retribution or intimidation.
-

Definitions

These terms and phrases pop up a lot throughout this Code of Conduct. Use this as your cheat sheet if you're unfamiliar with any of them.

AFFILIATION(S)/ AFFILIATED PERSON

means any paid or non-paid position as officer, employee, board member, volunteer, or member of any other governing or advisory body; trustee of any entity; a consulting or other contractual arrangement; or any other significant relationship.

CONFLICT OF INTEREST

arises when a person in a position of authority over an organization, such as an officer, director/trustee, or manager, may benefit financially from a decision they could make in such capacity, including indirect benefits such as to family members or businesses with which the person is strongly associated. In these circumstances, conflicts arise between a person's private interests on the one hand, and their fiduciary and professional obligations to the Enterprise (and the community it serves) on the other hand.

COPYRIGHT

is an exclusive right to reproduce, distribute, create derivative works from, and otherwise disseminate a work of authorship that is fixed in a tangible medium. Copyright does not protect ideas, but rather the expression of ideas in a fixed form such as books, papers, reports, educational materials, recorded media, software code, etc. Securing a copyright does not require any formal action or examination by the government. However, registration may be required to stop others from infringing on a copyright.

COVERED PERSONS

includes any director or officer, any member of any committee of the Board of Directors, any key employee as designated by the Chief Legal Officer of Highmark Health, and any person who has authority to act on behalf of the Board of Directors.

CREATOR

is any employee, contractor, or student of a Highmark Health entity.

DESIGNATED HEALTH SERVICES (DHS)

means all inpatient and outpatient hospital services and other services as defined at 42 CFR (Code of Federal Regulations) 411.351. A DHS entity would be an entity that provides DHS services.

Designated Health Services (DHS) includes:

- Clinical laboratory services
- Physical therapy services
- Occupational therapy services
- Outpatient speech-language pathology services
- Radiology and certain other imaging services
- Radiation therapy services and supplies
- Durable medical equipment and supplies
- Parenteral and enteral nutrients, equipment, and supplies
- Prosthetics, orthotics, and prosthetic devices and supplies
- Home health services
- Outpatient prescription drugs
- Inpatient and outpatient hospital services

FAMILY MEMBER

includes spouse, domestic partner, parents (including stepparents), grandparents, parent-in-law, siblings (whole, step, or half), children (natural or adopted), stepchildren, grandchildren, great-grandchildren, and the spouses of siblings, children, grandchildren, and great-grandchildren.

This also includes anyone living in the same residence as the director, officer, or employee; anyone who is financially dependent on the director, officer, or employee; and/or anyone whose investments are controlled by the director, officer, or employee.

INCIDENTAL BENEFITS

include compensation in the form of items or services (not including cash or cash equivalents) from a hospital to a member of its medical staff when the item or service is used on the hospital's campus.

INTELLECTUAL PROPERTY (IP)

refers to intangible assets, rather than physical assets, such as buildings, real estate, and equipment. IP includes patents and potentially patentable inventions, copyrights, trademarks, and trade secrets.

INVENTION

is a process, machine, article of manufacture, or composition of matter. To receive a patent, the invention must be new, non-obvious, and useful, and it must cover patent-eligible subject matter.

**NON-MONETARY
COMPENSATION/BUSINESS
COURTESIES**

for purposes of this policy, includes the provision of items of value given free of cost (gifts) by AHN, as well as invitations to social events sponsored or hosted by AHN such as meals, sporting events, theatrical events, and receptions. It would also include advertising or the promotion of activities for a physician's private practice. See Pol-7009809 Non-Monetary Compensation/ Business Courtesies in PolicyWeb.

OWNERSHIP INTEREST

means any ownership or investment interest that is equal to or more than 5% of the total ownership of an entity, including, but not limited to, stock, limited liability company membership interests, securities, options, warrants, debt instruments (including loans and bonds), private investment, partnership, proprietorship, or rights to acquire any of the foregoing; provided, however, that the term shall not include interests in mutual funds.

PATENT

is a government-issued document that provides the patent holder with a right to prevent others from making, using, or selling a patented invention for a limited period of time.

TRADEMARK

is an identifier of source of a product or service and is often referred to as a "brand." Trademark rights arise through use in commerce and/or registration with the United States Patent and Trademark Office (USPTO).

TRADE SECRET

is anything that is valuable to a business and not known to others outside of an agreement of confidentiality. Examples of trade secrets include formulas, patterns, know-how, and company policy and guidelines. The key to trade secret protection is to maintain the secret's confidentiality. Any disclosure of the trade secret must be made in confidence following the terms of an applicable non-disclosure agreement.

WORKFORCE MEMBERS

includes officers, workforce members, volunteers, trainees, and other persons whose conduct, in the performance of work for Highmark Health or its affiliates and subsidiaries, is under the direct control of Highmark Health or its affiliates and subsidiaries, whether or not they are paid by Highmark Health or its affiliates and subsidiaries.

