

STANDARDS FOR ETHICAL BEHAVIOR
Code of Ethical Business Conduct



Just as our building's blue lights signify our presence and stability in the community, our Code of Ethical Business Conduct symbolizes our commitment to doing the right thing.

We place high value on our standards of ethical behavior because we want to always be here for our members and community.



President and Chief Executive Officer, Blue Cross and Blue Shield of Kansas City

A Message from David Gentile

Blue Cross and Blue Shield of Kansas City (Blue KC) has been, and always will be, a symbol of stability in Kansas City – for our members and our community. Our success can be attributed to our strong leadership, caring employees, innovative products and excellent customer service. But there is a source of success that is often less emphasized, although it has a direct impact on a company’s longevity and strength. The level of commitment to ethical practices and conduct can make or break a company. At Blue KC, we take this commitment seriously.

The Blue KC Code of Ethical Business Conduct is the foundation of our Ethics and Compliance Program and guides our actions and decisions. Our Ethics and Compliance Program establishes behavioral standards and ensures that we are in compliance with laws and regulations. It also provides a means for employees to ask questions or voice their concerns.

Our success is built upon our commitment to being Blue KC: customer focused, trusted, empowered, innovative, committed to health and wellness, and proud to be Blue KC. Our customers, communities, business partners, coworkers, and regulators expect that we will conduct our business with integrity. Every interaction, every decision and every goal must be approached with a dedication to ethical business conduct.

While our Code applies to our Board of Directors, officers, management, and employees, we expect all Blue KC agents, business partners, vendors, contractors, and consultants to understand the importance of our Code when doing business with our company.

In conclusion, our Code is only meaningful if it is used. That’s why it’s important to apply these standards every day and review them from time to time. As you read our Code, always remember that your job involves more than your day-to-day accountabilities. It involves a commitment to integrity.

Thanks for all you do for Blue KC.

A handwritten signature in black ink that reads "David Gentile". The signature is written in a cursive, flowing style.

David Gentile

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ETHICAL CONDUCT

We must perform our jobs in a manner consistent with the Code of Ethical Business Conduct.

Each of us has a responsibility to act honestly and ethically. Our Code of Ethical Business Conduct (Code) provides the framework to put Blue KC's values into action.

We all have a responsibility to act with integrity, comply with applicable laws and regulations - both in letter and spirit - and live up to the Code of Ethical Business Conduct. We expect every person associated with Blue KC to act with these standards in mind.

The Code does not address every possible ethical or legal issue that you might encounter. If there is a law, regulation or policy to guide your decision in a particular situation, follow it. If there isn't, ask yourself:

Is there something about the situation that could damage Blue KC financially?

Could my action appear wrong to others?

Would my action hurt my reputation or the reputation of Blue KC?

Do I have enough information to make a good decision?

Would I be embarrassed if my actions were published on the front page of the newspaper or on the Internet?

FOLLOWING THE CODE OF ETHICAL BUSINESS CONDUCT

Everyone must adhere to the Code.

Adherence to the Code is mandatory for all employees (includes officers, management and non-management), contractors, and members of the Board of Directors (Board Directors) – no one is exempt. Additionally, corporate policies and procedures are in place to provide more detailed information.

Anyone who violates the Code, corporate policies and/or corporate procedures will be subject to disciplinary action, which could range from a verbal reprimand up to loss of employment. If at any time you are aware of actual or potential non-compliance with the Code, you must report it to your immediate supervisor or to the Ethics and Compliance Office (ECO) as soon as possible, and you may do so without fear of retaliation or discrimination.

Neither the company, nor any of its employees, may retaliate or discriminate against an employee, who in good faith, lawfully provides information regarding any conduct, which the employee reasonably believes is non-compliant with the Code, regulations, or state or federal laws.

If you have any questions about whether your actions might violate the Code of Ethical Business Conduct, questions about a possible incident of non-compliance, or you need to report an incident of non-compliance, discuss the issue with your immediate supervisor or contact the ECO.

You may contact the ECO using any of the methods below:

CALL the ECO directly at 816-395-CALL (816-395-2255)

E-MAIL your question or concern to the ECO at [_ECO](#) (internal e-mail system)

Use the Report an Incident link located on the front page of Inside Blue KC (you can report anonymously if you desire)

Contact the Audit Committee of the Board of Directors on the Audit Committee Hotline at 816-395-2408 (anonymously if you desire)*

** Use this resource if you have reason to believe that Blue KC or an individual has submitted, or attempted to submit, a false or fraudulent claim for payment to the United States Government; or if you have reason to believe that Blue KC has engaged in improper financial or accounting practices or reporting.*

OUR WORK ENVIRONMENT

Employees will be treated with fairness, dignity and respect.

Our greatest and most valuable asset is our workforce. All employees should be committed to maintaining a safe and professional working environment and to ensuring we are all treated with fairness, dignity and respect.

We must observe all government regulations and rules promoting protection of workplace health and safety. We must also comply with all laws and policies related to non-discrimination in all our personnel actions.

How we treat each other in our daily work is as important as how we treat our customers and business partners. We should remember that, while clearly improper activities such as discrimination and harassment will not be tolerated, seemingly innocent behavior such as spreading gossip and rumors can cause distress and ill will among coworkers.

Any conduct that creates a hostile or offensive atmosphere will not be tolerated. This applies to all employees and all forms of communication. If you observe these behaviors, please remember your responsibility to report them to your immediate supervisor and/or Human Resources. Please see the Employee Handbook for additional information related to our work environment.

“It’s not enough that we do our best, sometimes we have to do what’s required.”

Sir Winston Churchill

YOUR RESPONSIBILITIES UNDER THE CODE

All employees and Board Directors must:

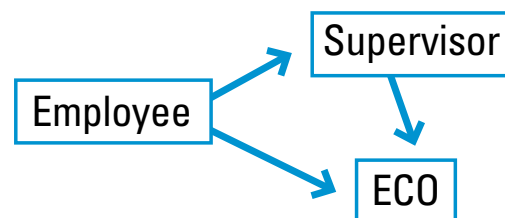
- Follow our Code and Blue KC policies
- Ask if you don’t know how to handle a situation
- Report incidents of non-compliance
- Fully cooperate with inquiries and investigations

Employees with management responsibility have additional responsibilities related to the Code.

They are expected to:

- Disclose all employee-reported incidents of non-compliance to the ECO
- Embrace the Code and model the behavior of an ethical leader
- Maintain a workplace environment supportive of the Code
- Educate employees in the meaning and application of the Code
- Enforce the Code

Reporting Incidents of Non-Compliance



CONFLICTS OF INTEREST

We must not engage in any activities that conflict or appear to conflict with our responsibilities as employees or members of the Board of Directors.

Conflicts of interest exist when a person's personal or private interests interfere, or appear to interfere, in any way with the interests of the company. We must all be alert to, and generally avoid, situations that are an actual conflict or could cause a reasonable member of the public to perceive a conflict.

Since the appearance of a conflict may cause our business partners and customers to question our motives, we must monitor our activities so that our personal interests do not create such a situation. Remember, if it looks like someone has an unfair advantage or might gain financially, then it could be a conflict. Consider the following examples, but know that other conflicts may also exist. If you are unsure if there is a conflict, talk to your immediate supervisor or contact the ECO.

Example 1: Financial interests (self or family member) in a competitor, companies doing business with our organization or companies seeking to do business with our organization

Example 2: Secondary employment

Example 3: Gifts and entertainment (giving or receiving - discussed further in Dealing with Customers, Suppliers and Third Parties)

Example 4: Vendor and third party sponsored workshops, seminars and training sessions (discussed further in Dealing with Customers, Suppliers and Third Parties)

Everyone should avoid outside activities (owning, operating or volunteering) that unreasonably encroach on work time, interfere with regular duties, adversely affect the quality of work performed or negatively impact our company's reputation. Pursuing business opportunities that are discovered through the use of company property, information or position is prohibited. All outside activities that could appear to be conflicts of interest should be reported to your immediate supervisor and the ECO.

We must avoid any situation where our personal relationships or activities could influence, or appear to influence, our actions.

Organizational conflicts of interest occur where another activity or relationship (yours or your family members) may cause, or appear to cause, the company, its subsidiaries or joint ventures to be unable to:

- Give impartial assistance or advice
- Perform contractual obligations without impairment
- Avoid an unfair competitive advantage

Compliance with this standard requires full disclosure on the part of all employees and members of the Board of Directors. All employees and Board of Directors will complete an Annual Conflicts of Interest Survey. New employees will complete the survey upon completion of New Employee Training.

Each employee must disclose all actual or potential conflicts of interest on this survey so that the company can determine whether a conflict exists. If it is determined that a conflict exists, the company will determine what actions should be taken to eliminate or avoid the conflict.

If something in your status changes, you must report it immediately. You can do this using the Report an Incident button on the front page of Inside Blue KC.

If you are unsure if you have a conflict, report it just to be on the safe side, or talk to the ECO to clarify the situation. See the corporate Conflicts of Interest policy for additional information.

SCENARIO: My spouse recently started a new position with a hospital that does business with Blue KC. My position at Blue KC requires me to interact with this hospital. Do I need to report this information to the ECO?

ANSWER: Yes. In addition, you need to inform your immediate supervisor of the situation. The ECO will work with you and your supervisor, if necessary, to mitigate any potential risks created by your situation.

DEALING WITH CUSTOMERS, SUPPLIERS AND THIRD PARTIES

Business decisions should not be influenced by accepting or offering favors.

When dealing with customers, suppliers, brokers and other third parties, Blue KC employees and Board Directors must consider how our activities could be viewed by others. This section of the Code will discuss Entertainment, Gifts, Bribes and Kickbacks, Routine Business Courtesies, and Honoraria.

Entertainment (e.g., sporting, arts, cultural or charitable events) must be part of a legitimate business activity based on the scope and responsibilities of your job, and be within the bounds of reason and moderation. If the host will not be present, then the event is not a legitimate business activity and is subject to the gift criteria outlined below. All entertainment must be reported to your immediate supervisor and the ECO (in advance whenever possible). Meals follow the same guidelines as entertainment but are not required to be reported.

Gifts of nominal value (defined as \$100 or less) may be accepted by Blue KC employees and Board Directors. If you are offered a gift valued at greater than \$100, you must obtain approval from the ECO before accepting it. The ECO will evaluate the gift and provide guidance on the appropriate manner in which to decline, accept and/or distribute the gift.

Employees and Board Directors should never accept cash or cash equivalents. Gift cards issued by a bank are considered cash equivalents. Gift cards or certificates from retailers are not considered cash equivalents but are subject to the gifts standards outlined above. Door prizes, raffle items and prizes won due to participation are allowed.

Employees of the government are subject to strict rules concerning gifts, meals and other business courtesies. Therefore, we must all take special precautions to ensure that no Blue KC employee offers or provides any gifts, entertainment, meals or anything else of value to a government employee without prior approval of the ECO.

Things to remember when evaluating a gift:

- *You should not accept entertainment, gifts or courtesies that may appear to compromise your ability to act in Blue KC's best interests.*
- *If a gift exceeds \$100 in value, you must obtain approval from the ECO prior to accepting.*
- *Gifts, entertainment and courtesies must be part of a legitimate business activity based on the scope and responsibilities of your job, and be within the bounds of reason and moderation.*
- *You cannot accept cash or a cash equivalent.*
- *You must disclose entertainment to the ECO.*
- *You must receive approval from the ECO prior to accepting non-routine business courtesies or Honoraria.*
- *If you work in Procurement or are involved in purchasing decisions, you cannot accept any gifts.*
- *If you work in a business unit administering a government contract (Medicaid, FEP, TriWest), you cannot accept any gifts.*

“ It takes 20 years to build a reputation and 5 minutes to ruin it. ”

Warren Buffet

Bribes and Kickbacks - Offering or accepting a gift or gratuity in exchange for favorable treatment or to secure business could subject you as an individual and Blue KC as an organization to criminal prosecution. Blue KC employees are strictly prohibited from offering, giving, soliciting and/or accepting gratuities, bribes, and kickbacks.

A **Routine Business Courtesy** will be reasonably related to a legitimate business activity based on the scope and responsibilities of your job and within the bounds of reason and moderation. Examples would include a meal at a local restaurant with business associates or a coffee mug with the company logo given to a non-government customer.

Employees and Board Directors must be especially vigilant in their business dealings with actual or potential business partners or customers to ensure that what you may construe as a routine business courtesy is not, in fact, a bribe or a kickback. This includes giving and receiving of courtesies. You must avoid giving or accepting travel, lodging, and/or entertainment that is not a reasonable adjunct to a business relationship. All Blue KC-owned tickets distributed to our actual or potential business partners or customers should be documented in the internal ticket tracking system.

If you are offered a non-routine business courtesy, or a courtesy that could be perceived as outside the bounds of reason and moderation, you must receive approval from the ECO prior to accepting.

Honoraria are payments, such as cash, gifts, travel and lodging expenses (including vendor-paid travel), for speaking engagements, vendor conferences, or participation in a panel/focus work group on behalf of Blue KC. Honoraria could be perceived as conflicts of interest. Employees and Board Directors cannot accept Honoraria that are not outlined in a vendor's contract.

To disclose any concerns, you may use any of the methods below:

Use the Report an Incident link located on the front page of Inside Blue KC

CALL the ECO directly at 816-395-CALL (816-395-2255)

E-MAIL your question or concern to the ECO at _ECO (internal e-mail system)

SCENARIO: As part of my job, I help evaluate the companies that provide goods and services to Blue KC. A vendor that we do not currently do business with has offered to fly me to their headquarters and pay for my meals and lodging so that I can meet their senior staff and evaluate some new products they wish to demonstrate. I'm not sure if I can accept this?

ANSWER: We are not to give or accept gifts that exceed nominal value in exchange for favorable treatment or to secure business. In this case, the cost of this trip clearly exceeds nominal value and could be viewed as an improper inducement to give our business to this vendor. If there is a legitimate business purpose to travel to evaluate goods and services, Blue KC will pay for the traveling expense.

COMPETING ETHICALLY AND FAIRLY

We must take special care to avoid engaging in anti-competitive activities or unfair practices.

Blue KC is committed to ethical professionalism. We treat employees, customers, business partners and competitors in a fair and honest manner.

All information about our competitors must be obtained in compliance with the law and the standards of the Code of Ethical Business Conduct. Do not solicit or obtain confidential information about a competitor in a manner that would be illegal, unethical or would require a person to violate a contractual agreement, such as a confidentiality agreement with a prior employer.

We must be especially careful not to get drawn into discussions of inappropriate topics, such as pricing, labor costs, marketing plans, etc., when meeting with competitors or potential competitors. If you find yourself in such a situation, immediately end the conversation. If appropriate, ask that your refusal to participate in the discussion be documented in the meeting minutes. You should also immediately report any such incident to the ECO.

Finally, be mindful of this standard as it also applies to our external communications to customers and the community at large. Make certain that all information we provide about our products and services is truthful and accurate and does not contain misleading or deceptive information.

You must never discuss or be involved in a discussion that includes the following activities:

- *Collaborating with a competitor or other Blue Plans to decide what to charge for a product*
- *Advertising which is untruthful or misleading*
- *Agreeing with competitors or other Blue Plans to refuse to deal with particular vendors*
- *Agreements to allocate the market for our goods and services among ourselves, other Blue Plans and/or our competitors*
- *Discussing pricing or supplier relationships with a competitor or other Blue Plans*
- *Discussing pricing, labor costs or marketing plans at Association or Trade Association meetings*
- *If you find yourself in any of these situations, immediately remove yourself from the situation and report it to the ECO*

“Always do right. This will gratify some people and astonish the rest.”

Mark Twain

CONFIDENTIAL INFORMATION

Each of us must safeguard confidential information at all times.

Confidential information is a general term indicating business information that needs to be protected by Blue KC employees. Additional information regarding confidential information can be found in the Confidentiality of Business Information policy.

In general, Blue KC defines confidential information as follows:

Classification	Description
Restricted	Highly confidential or sensitive information. Information that is not kept on any Blue KC system unless it is encrypted at all times. <i>An example includes credit card information.</i>
Confidential	Information that needs to be limited based on the duties of your job. This information must be encrypted during transmission over the public Internet. <i>Examples include Protected Health Information (PHI) and Personally Identifiable Information (PII).</i>
Corporate	Information considered by management to be business sensitive or needing additional controls. <i>Examples include marketing plans or financial information.</i>
Internal Public	This information is available to all employees, contingent workers, vendors and any other users on the Blue KC internal network or systems. This information should only be used for business purposes.

No one should disclose confidential information to persons within or outside the company unless they have a legitimate need for the information and have been properly authorized by management or the ECO to receive it. To protect confidential information, you should take reasonable steps so that persons who don't legitimately need to know the information cannot intentionally or inadvertently discover it.

SCENARIO: I work in Claims and can access my customers' claims data. My sister wants copies of all her Explanation of Benefits (EOBs) for the current year. She is not a member of a group I service, but wants me to pull copies for her. Can I do this?

ANSWER: No. Although your sister has given you permission, this is not an authorized part of your job. Your sister must call Customer Service and request the copies directly from them.

Reasonable steps to safeguard confidential information include keeping confidential data in a secured location in your office or work area, filing information in secured locations on Blue KC systems, and not discussing confidential information with coworkers in public areas such as cafeterias or elevators. You must protect this information from improper use or disclosure even after your employment ends.

Ways to protect confidential information:

- Keep confidential data in a secured location in your office or work area.
- Ensure confidential information is appropriately secured in Blue KC information systems.
- Do not discuss confidential information with coworkers in public areas such as elevators and restaurants.
- Immediately report any disclosures of confidential information to the ECO.

The federal privacy laws* prohibit improper uses and disclosures of Protected Health Information (PHI) and Personally Identifiable Information (PII). It is critical that you follow Blue KC's privacy policies and procedures at all times. Any use or disclosure of PHI is subject to potential civil and/or criminal fines and penalties. Please see the HIPAA Resource Center for additional information about protected information.

**Federal Privacy Laws:*

HIPAA – the Health Insurance Portability and Accountability Act of 1996

HITECH – the Health Information Technology for Economic and Clinical Health Act of 2009

USE OF BLUE KC RESOURCES

Company assets should be used for the benefit of the company.

Company assets should generally be used for business purposes and should be safeguarded against loss, theft or destruction. Contingent workers utilizing Blue KC systems should refrain from any personal use of Blue KC networks or systems. If there is any uncertainty on appropriateness of use, employees and contingent workers should consult their immediate supervisor. Additional information can be found in the Acceptable Electronic Systems Use corporate policy.

Company assets include, but are not limited to:

- Equipment
- Materials
- Furniture
- Office Supplies
- Computer Equipment
- Electronic Mail System
- Telephone Equipment
- Office Machines
- Computer Software
- Work Product

Use of Blue KC Internet and e-mail resources is not private, nor anonymous. Blue KC users should not have an expectation of privacy at any time while using equipment or computing resources.

Blue KC assets may not be used for:

- Any illegal activity
- Personal gain
- Unapproved solicitation of personal business
- Unapproved sale of any services or products other than Blue KC's
- Violations of the rights of any person or company protected by copyright, trade secret, patent or other intellectual property
- Harassment of any type
- Sexually explicit material
- Solicitation for religious or political causes, commercial enterprises, outside organizations or other activities not related to an employee's services to Blue KC
- Communications that are inappropriate, inflammatory or derogatory

“Real integrity is doing the right thing, knowing that nobody's going to know whether you did it or not. ”

Oprah Winfrey

RECORDS MANAGEMENT

Each of us is responsible for managing all business records in accordance with company policies.

Blue KC's business records, including medical records, must be retained in accordance with the law and Blue KC's Record Management policy. The term "Corporate Record" is defined as all documents and electronic information (stored in any medium) created or received during the course of Blue KC's business. Corporate Records are the sole property of Blue KC and do not belong to employees.

A Legal Hold Order will be issued for certain records when normal retention guidelines do not apply due to litigation, government investigations or audits. The Legal Division will provide additional information related to any Legal Hold Order.

You may contact the ECO with any questions related to records management.

SCENARIO: Last week, a coworker and I went to the Association in Chicago for a meeting. We rode the train from the airport to our hotel. My coworker suggested that we submit a cab fare on our expense report and get reimbursed for the higher amount.

ANSWER: Though your coworker has put you in a difficult situation, it is a violation of the Code of Ethical Business Conduct to falsify an expense report. Additionally, as an employee, you have an obligation to report any violations of the Code (see Standard #5 – Reporting Non-Compliance, Duty to Report).

TRUTHFUL AND ACCURATE REPORTING

We must take special care to record and report information accurately and honestly.

Each of us is responsible for ensuring that the information we record and report as part of our daily job duties is truthful and accurate. This includes the correct reporting of time worked, business expenses, performance data and any other business-related activities. If you are ever asked to report data that is not accurate or truthful, or to wrongfully or illegally alter data in any Blue KC records or documents, refuse the request and immediately contact your immediate supervisor or the ECO.

KNOWING AND COMPLYING WITH LAWS, REGULATIONS AND POLICIES

We must conduct our business in accordance with the law at all times.

Blue KC is subject to a variety of federal, state and local laws. In order to comply with these requirements, we must each be knowledgeable about the laws and policies applicable to our individual roles and responsibilities.

We are also responsible for asking questions when we are uncertain about the legality or propriety of an action or request. If you think a law, regulation or policy is not being followed, you must report it. If you have any doubt as to the appropriateness of any action, be sure to seek advice from your immediate supervisor or the ECO.

GOVERNMENT AS A UNIQUE CUSTOMER

We must follow unique rules applicable to government contractors.

As a government contractor, we have a special obligation to the government and the public to ensure the highest degree of integrity. Examples of government contracts include, but are not limited to, Medicaid, FEP, and TriWest.

When the government is our customer, there are additional laws and regulations involved in the areas of cost records, price estimation, time charging, gratuities, kickbacks, and classified information. Therefore, special care and attention must be given to ensure we understand and comply with these additional laws and requirements.

If you work in a business unit administering a government contract (federal, state or local), you need to be aware of the applicable statutory, regulatory and program requirements. If you are unsure of these requirements, contact your immediate supervisor or the ECO for guidance.

Under the Federal False Claims Act and the Federal Program Fraud Civil Remedies Act of 1986, it is a crime

to knowingly make a false claim for payment to the government or to knowingly make a false statement to the government. If you falsify data that is submitted to the government, you have committed a crime. This is true even if you are not doing so in an attempt to obtain payment. Both you and the company could be subject to criminal prosecution for non-compliance and could be subject to severe penalties and fines. In addition, both you and the company could be prohibited from working on government projects in the future.

If you have any questions about the unique requirements related to government contracts, contact your immediate supervisor or the ECO for guidance.

POLITICAL ACTIVITIES

Do not engage in improper political activities.

You must not conduct your activities in a manner which gives others the impression you are speaking on behalf of Blue KC or otherwise representing Blue KC, unless authorized to do so by the CEO or General Counsel.

Blue KC will not reimburse any employee for political contributions, and employees should not attempt to receive or facilitate such reimbursements. Employees may not contribute to or endorse any political campaign on behalf of Blue KC without prior approval of the General Counsel or Deputy General Counsel. Generally, no contribution may be made with the expectation of favorable government treatment in return.

If your position in Blue KC requires you to have personal contact with governmental entities and officials on Blue KC's behalf, be sure that you are aware of and understand all relevant regulatory provisions applicable to such contacts.

If you have questions about your actions, please contact the ECO or the Vice President & Deputy General Counsel.

GOVERNMENTAL INVESTIGATIONS

We will cooperate with government investigations and reasonable requests for information.

Blue KC may be asked to cooperate with a government investigation or to respond to a request for information from the government about how we conduct our business.

When Blue KC receives official requests for information or cooperation, someone will notify you of your responsibilities and duties in connection with providing such information and cooperation. If you are contacted by government investigators, and are asked to meet with them individually to discuss activities in connection with your employment by Blue KC, Blue KC requests that you immediately notify the ECO of this contact.

The decision of whether to cooperate with their inquiry is up to you alone. You will not be disciplined, punished or otherwise retaliated against due to this decision. However, if you decide to speak with government investigators, be sure that you are accurate and truthful in all your answers because if you are not, both you and Blue KC could be subject to criminal prosecution.

All documents and data are the property of Blue KC. You may not provide documents or data in any form or format without first obtaining specific authorization from the Legal Division.

Remember these key points if you are contacted by a government investigator:

- *Please notify the ECO*
- *It is your decision whether to talk with an investigator*
- *Tell the truth and be accurate*
- *Don't release any documents (in any form—paper or electronic) without specific approval*
- *Blue KC policy prohibits retaliation*

DUTY TO REPORT

We all have a duty to inquire and report.

Anyone who violates the Code, corporate policies and/or corporate procedures will be subject to disciplinary action, which could range from a verbal reprimand up to loss of employment. If at any time you are aware of actual or potential non-compliance with the Code, you must report it to your immediate supervisor or to the ECO as soon as possible. You may do so without fear of retaliation or discrimination.

What types of things can result in termination or corrective action?

- Submitting a false timesheet, expense report or tuition reimbursement form
- Inappropriately accessing another associate's or member's confidential information
- Lying or not cooperating during an investigation
- Failure to report a known or suspected violation of the Code

Neither the company, nor any of its employees, may retaliate or discriminate against an employee who, in good faith, lawfully provides information regarding any conduct which the employee reasonably believes is non-compliant with the Code, regulations, or state or federal laws.

You can always contact the ECO for information or to report an incident of non-compliance.

CALL the ECO directly at 816-395-CALL (816-395-2255)

E-MAIL your question or concern to the ECO at [_ECO](#) (internal e-mail system)

*Use the [Report an Incident](#) link located on the front page of *Inside Blue KC* (you can report anonymously if you desire)*

Contact the Audit Committee of the Board of Directors on the [Audit Committee Hotline](#) at 816-395-2408 (anonymously if you desire)*

** Use this resource if you have reason to believe that Blue KC or an individual has submitted, or attempted to submit, a false or fraudulent claim for payment to the United States Government; or if you have reason to believe that Blue KC has engaged in improper financial or accounting practices or reporting.*

“ The time is always right to do what is right. ”

Martin Luther King Jr.



*Corporate Ethics,
Compliance and Privacy Officer
Blue Cross and Blue Shield
of Kansas City*

A Message from Sherilyn S. Fahlstrom

Thank you for reviewing the Code of Ethical Business Conduct. Your knowledge of and adherence to these Standards of Conduct help maintain Blue KC's reputation for conducting business in an ethical manner.

We are all faced with ethical questions at work. The Ethics and Compliance office is here to provide guidance, discuss your concerns, and help you work through these issues. I encourage you to contact us when you are not sure how to handle a situation, or if you just have a question. Remember to ask before you act!

Thank you for being Blue KC.

This Code booklet can be found online on Inside Blue KC or in Bluepoint. All of the resources and policies that are referenced in this document are hyperlinked in the online version.

- **On Inside Blue KC**, select Stuff We Do, Legal Services, Ethics and Compliance Office. You will find the link to the Code of Ethical Business Conduct at the top of the page.
- **On Bluepoint**, select the Corporate Site Collection, then the Ethics and Compliance Office. You will find the link to the Code of Ethical Business Conduct at the top of the page.

If you would like to locate the other references and policies without using the online version, these documents can be found in the following locations:

Employee Handbook – This document is located on the Blues HR page, which is accessible from the front page of Inside Blue KC (see the link at the top of the page). The Employee Handbook can be found under Featured Documents.

The HIPAA Resource Center can be found on Inside Blue KC or Bluepoint in the same location as the Code of Ethical Business Conduct.

The following corporate policies can be found under Corporate Policies and Procedures on Inside Blue KC. This link is accessible from the Tools page, which can be found on the front page of Inside Blue KC.

- Corporate Policy *I-4 Conflicts of Interest*
- Corporate Policy *I-20 Confidentiality of Business Information*
- Corporate Policy *X-1 BCBSKC Acceptable Electronic Systems Use*
- Corporate Policy *I-7 Records Management Including Retention and Destruction*

“Every job is a self-portrait of the person who does it. Autograph your work with excellence. ”

Author Unknown