

# Anthem<sup>®</sup>



## **Anthem Code of Conduct** January 2020

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## Our commitment to integrity



### Our Mission

Improving lives and communities. Simplifying health care. Expecting more.

### Vision

Be the most innovative, valuable and inclusive partner.

At Anthem, we are a company grounded in ethical behavior. Each of us is responsible for creating a work environment that promotes accountability, integrity and trust – both for ourselves, as well as for the consumers, care providers, regulators and communities who depend upon us. As we work together to simplify and improve the healthcare experience, we must exercise the highest standards of ethics and professional behavior by carrying out our **Code of Conduct**.

Our Code serves as the foundation of our Ethics, Compliance and Privacy Program. It provides clear guidelines for acting morally and with integrity in our decisions, our operations and the execution of all of our work and responsibilities as Anthem associates. With this in mind, I encourage you to read and understand the Anthem Code. Even if you've read the document before, please review it again. By thoroughly reviewing and following the Code, you are building upon Anthem's long-standing commitment to delivering the highest level of excellence in all that we do.

### Our Code supports our Anthem values

- **Leadership:** Redefine what is possible
- **Community:** Committed, connected, invested

- **Integrity:** Do the right thing, with a spirit of excellence
- **Agility:** Deliver today – transform tomorrow
- **Diversity:** Open your hearts and minds

Modeling our values in all areas of our business is core to who we are as a company. This focus strengthens our consumers' confidence in knowing that we will always conduct ourselves ethically as we partner to navigate and simplify the health care system. If you identify something you believe is not in accordance with our Values or our Code, please speak up. Anthem associates have several ways to seek guidance or to anonymously report concerns, which are specifically outlined in our Code. We are grateful to associates who take the initiative to report unethical behavior, and associates should know that retaliation of any kind is unacceptable.

As an enterprise, we can only achieve our Vision of leading our industry as the most innovative, valuable and inclusive partner if we remain committed to ethical conduct. Thank you for your continued commitment to doing the right thing – without compromise – for those whom we are privileged to serve.

**Gail Boudreaux**  
President and Chief Executive Officer  
Anthem, Inc.

## Be bold, be accountable



Anthem is on a bold journey both to simplify and to improve the health care experience for all Americans. Each of us plays a key role with accountability in ensuring our collective success. The way in which we perform our work, interact with our customers and collaborate with each other contributes to the environment here at Anthem. As an Anthem associate, we all have the opportunity to influence our reputation and culture through our personal example and behaviors. Choosing to act with integrity and shadowing the right thing is fundamental to delivering on our promise to the stakeholders who depend upon us.

Anthem's Code is a critical resource defining how our organization has established an environment that promotes doing the right thing. While each of us is required to read and understand how the Code guides us and our work, more importantly, the Code explains our responsibility to promote an ethical and compliant workplace.

After reviewing the Code, if you have any questions, there are resources available to assist you:

- Your manager
- Ethics and Compliance HelpLine  
1-877-725-2702
- [www.anthemethicshelpline.com](http://www.anthemethicshelpline.com)
- [ethicsandcompliance@anthem.com](mailto:ethicsandcompliance@anthem.com)
- Contact me directly 303-764-7277

Additionally, it is important to remember, as an Anthem associate, you have a responsibility to report any potential violation of our Code through one of the above resources. All reports are taken seriously and any retaliation for reporting in good faith is strictly prohibited.

Thank you for the active role you play in creating an ethical and accountable environment. Anthem's culture is built and nurtured by every action we choose every day, together. Let's hold each other accountable to be extraordinary!

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A handwritten signature in black ink that reads "Sarah J. Lorance". The signature is written in a cursive, flowing style.

**Sarah J. Lorance**

Senior Vice President, Chief Compliance Officer  
Anthem, Inc.

## Why we have the Code

The Code is a resource for all of us and is not a comprehensive policy or rulebook. Our Code provides us with guidance on conducting our business ethically. It also helps protect our reputation, customers, shareholders, suppliers and other business partners.

Anthem prohibits retaliation against anyone reporting in good faith a known or suspected ethical or compliance concern. Anyone found to have retaliated against someone for making such a report will be subject to corrective action, up to and including termination of employment. By reporting misconduct, you are contributing to Anthem's ethical culture and upholding Anthem's values.

Unless otherwise noted, the Code applies to associates, officers and directors of Anthem, Inc. and its affiliates and subsidiaries, first tier, downstream or related entities, and our business partners. Certain business units may approve supplements to this Code. For example, if you work in our Federal Government Solutions business (including Federal Health Products & Services, National Government Services and WellPoint Military Care) or DeCare Ireland, you must also comply with supplements or Codes applicable to those entities.

If you work with third parties, such as consultants, agents, brokers, suppliers, vendors, independent contractors, or first tier, downstream or related entities (third parties), you must require these parties to comply with relevant aspects of Anthem's compliance policies; provide these parties with information about policy requirements; and take action, up to and including terminating a contract, after learning a third party failed to abide by Anthem's compliance policies.

The Code does not create any contractual rights between you and Anthem. It may be changed or modified by Anthem at any time without notice. We should not interpret the Code as a promise of employment or continued employment.

Anthem's Ethics, Compliance and Privacy Program is led by the Chief Compliance Officer. The Anthem, Inc. Audit Committee of the Board of Directors oversees the program and receives periodic direct reports from the Chief Compliance Officer, as well as from business unit Compliance Officers, as appropriate. The Board of Directors may only grant a waiver of all or part of the Code under exceptional circumstances. Any waivers will be disclosed as required.

**Anthem's Code is the foundation of our Ethics, Compliance and Privacy Program. It guides our actions and our decision-making process. By understanding and following the Code, you help safeguard Anthem's integrity and reputation as an ethical, caring company.**



### When assessing whether our actions align with our Code, keep in mind Anthem's Guiding Principles:

1. Follow the Code and live Anthem's values
2. Report suspected or observed misconduct
3. Promote a safe and healthy work environment
4. Protect confidential and proprietary information
5. Adhere to policies when using Anthem assets
6. Disclose and manage conflicts of interest
7. Conduct Anthem's business with fairness and honesty
8. Comply with the laws and regulations wherever Anthem conducts business



## Our shared responsibilities

Our Code puts our company's values into action. We have a responsibility to comply with our policies and applicable laws where Anthem does business. By following the Code and living our values, we protect our reputation. Remember, we are all individually responsible for Anthem's integrity.

### Knowing and complying with our policies

We are responsible for knowing, understanding and complying with our policies and applicable laws. By committing to these responsibilities, we will continue to conduct our business with integrity and maintain the trust and high level of service expected from us.

To locate key company-wide policies, go to Pulse and enter keywords to search for the policy you need or see the list of [our policies](#) under Tools & Resources.

### Making ethical decisions

The Code and our policies cannot replace our own sense of integrity and good judgment. We are each responsible to do what is right. We should act with unquestionable ethics in all business matters and never commit, or ask others to commit, unethical or illegal acts. Immediately report any request or direction to commit an act you think may be illegal or unethical.

### Associate training

All associates are required to complete the training assigned to them within the time period provided.

Managers must ensure their associates complete their assigned training. Failure to complete required training subjects associates to corrective action, up to and including termination of employment.

### Enterprise risk management

We have a responsibility to understand and follow company policies that address our business risks. Managers have an additional responsibility to identify and properly manage risks. Managers and associates should work together to help ensure effective controls and mitigation strategies are in place to minimize risks.

If you are aware of business risks not being managed appropriately, discuss them with your manager, [Internal Audit](#) or [Enterprise Risk Management](#).

# Reporting violations and seeking advice

We all have a responsibility to speak up and report issues. We must all foster a culture where everyone feels comfortable raising issues or concerns in good faith without fear of retaliation.

## How do I know if doing something may be unethical or violate the spirit of our Code?

Ask yourself the following questions:



If you answered “no” to any of these questions seek guidance from your manager before you act, or you may also contact [Human Resources](#) or the [Ethics Department](#) for advice.

## Reporting misconduct and ethics concerns

We have an obligation to report to the Ethics Department any suspected or observed misconduct, including violations of the Code, company policies and procedures, laws and regulations, or any other ethical concerns. Reporting suspected or observed misconduct or other ethical concerns is a condition of our employment. We all must be committed to “do the right thing”.

The Ethics Department provides us with various channels to submit reports or to ask questions. You may first contact your manager for help, or if a concern raised with your manager is not resolved, the matter may be reported directly to the Ethics Department.

You may submit your report confidentially and anonymously by contacting the [Ethics Department](#) as follows:

- Calling the Ethics and Compliance HelpLine
  - From United States: 877-725-2702
  - From India: 000-8000-4022-65
  - From Israel: +1-317-287-5699
  - From the Philippines: 02-8299-3864
  - For FGS associates: 800-438-4427
- Submitting an online report at [www.anthemethicshelpline.com](http://www.anthemethicshelpline.com)
- Sending an email to: [ethicsandcompliance@anthem.com](mailto:ethicsandcompliance@anthem.com)
- Sending a letter to:
 

Ethics Department  
c/o Chief Compliance Officer  
Anthem, Inc.  
Post Office Box 791  
Indianapolis, IN 46206 United States

- Or report your concerns directly to the Chief Compliance Officer by telephone or by email.

Additional contact information for FGS associates is available in the FGS Supplemental Code of Conduct.

### Living our values: Leadership

Managers should contact the [Ethics Department](#) when suspected or observed misconduct is reported to them.



## Reporting misconduct and ethics concerns – managers’ responsibility

Managers are role models and lead by example. Associates often rely on their manager for guidance in difficult situations. Managers must foster an ethical and compliant culture, and encourage their associates to bring concerns to their attention. Managers are expected to:

- Embrace the Code and be an example of an ethical leader.
- Maintain a workplace environment supportive of the Code.
- Maintain an [“open door” policy](#) so associates feel comfortable bringing concerns to you.
- Periodically remind associates about our [non-retaliation policy](#).
- Talk openly about ethical behaviors whenever possible.
- Ensure associates timely complete required training.
- Ensure associates know the importance of reporting concerns and misconduct.
- Enforce the Code and apply consistent corrective action for violations.
- Educate and reinforce with associates the meaning and application of the Code.

Also, see [Manager’s Guide to Ethical Leadership](#) for additional guidance on being a role model for our associates and how to encourage our associates to conduct Anthem business with integrity.

“ *The first law of leadership is that your foundation is built through integrity, character, and trust.* ”

– Brian Cagneey, *Leadership: The 7 Laws Of Leadership*

## Does the Ethics Department investigate all concerns reported?

Yes, all reports are investigated. When a concern is reported that is more appropriately handled by another business unit (e.g., Human Resources, Internal Audit, Special Investigations Unit, Compliance or Privacy, etc.) the concern will be referred to them.

## What are some examples of misconduct resulting in potential corrective action?

Some examples include, but are not limited to:

- Submitting false timesheets or expense reports
- Inappropriately accessing another associate's or member's confidential information
- Lying or failing to fully cooperate in an investigation
- Not reporting a known or suspected Code violation
- Making an intentional false report of a Code violation
- Inappropriate use or disclosure of confidential or proprietary information
- Not completing required ethics, compliance and privacy training

Reporting concerns timely is critical so they can be addressed at the earliest possible stage.

## When is the Ethics and Compliance HelpLine available?

The HelpLine is available 24 hours a day, seven days a week and 365 days a year and is managed by a third party. All calls are confidential. Calls are not traced and no attempt is made to identify callers who request anonymity. Callers may remain anonymous to Anthem, even if they provide their identity to the third party HelpLine vendor.

You may also submit a report online at [www.anthemethicshelpline.com](http://www.anthemethicshelpline.com). If you submit a concern via the online form or HelpLine, you can check the status by going to [www.anthemethicsreportstatus.com](http://www.anthemethicsreportstatus.com), or you may contact the HelpLine directly.

## Q&A

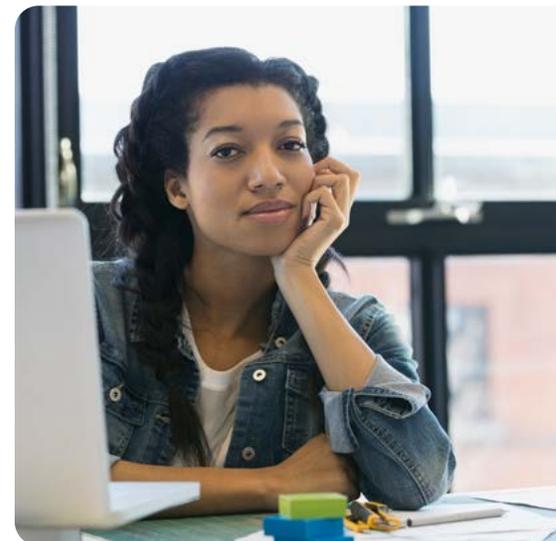
### Q. What is a "good faith" report?

A. A good faith report is one where the reporter has a reasonable belief the information provided relates to possible misconduct.

### Q. I am an employee of a vendor working on an Anthem contract. How can I make a report?

A. You may send a written report to the post office box address, send an email to the [Ethics Department](#), call the Ethics and Compliance HelpLine, or submit an online report. You may also report concerns to any team member of the [Ethics Department](#) or the Chief Compliance Officer directly by telephone or email. In addition, the Ethics Department will accept international calling charges. Translation services will be arranged as necessary.

This Code is published under the Corporate Governance section on our public Internet site at [www.antheminc.com](http://www.antheminc.com). The [Anthem Supplier Code of Conduct](#) is also published on our public Internet site and contains the [Ethics Department](#) contact methods.





## Reporting accounting, auditing and internal accounting control concerns

Concerns regarding accounting, auditing and internal accounting controls deserve special mention because they could affect our financial reporting obligations. We must report concerns about accounting, auditing and internal accounting control deficiencies or non-compliance to the [Ethics Department](#) using one of the channels previously identified. Some examples include, but are not limited to: false statements or deliberate errors in the recording and maintaining of Anthem's financial records; false statements or deliberate errors in the preparation, evaluation, review or audit of any Anthem financial statement; and deficiencies in or non-compliance with Anthem's internal accounting controls or policies.

## Reporting fraud, waste and abuse

Anthem recognizes the importance of preventing, detecting and investigating fraud, waste and abuse, and is committed to protecting and preserving the integrity and availability of health care resources. Anthem accordingly maintains a comprehensive program to combat fraud, waste and abuse.

Fraud, waste and abuse, dishonesty or criminal conduct involving our business operations is not allowed and will not be tolerated.

Actual or suspected crime, fraud or other misconduct in violation of the law or the Code by the company, or any associate or affiliate acting on behalf of the company, must be promptly reported to the company as follows:

To report member or provider fraud, waste and abuse concerns, contact the Special Investigations Unit directly, call the applicable state SIU hotline number or complete the online [Fraud and Abuse referral form](#). NGS associates should complete the [Contract Services Referral form](#).

**“ Knowing what's right doesn't mean much unless you do what's right. ”**

**– Franklin Roosevelt**

## Non-retaliation and non-intimidation

Anthem prohibits retaliation against any person for reporting in good faith any suspected or observed misconduct, non-compliance or other ethical concerns, and accounting, auditing or internal accounting control concerns.

Acts of retaliation in violation of this [policy](#) should be reported to the [Ethics Department](#).

## Investigating reported violations, confidentiality and duty to cooperate

The Ethics Department reviews all reports received and fully investigates, as appropriate, all ethics and compliance concerns, or ensures the appropriate business area, if applicable, reviews the matter. Appropriate corrective action will be taken to address and correct reported concerns. We treat all reports confidentially. The information provided will be shared only on a “need-to-know” basis with those responsible for resolving a concern.

We all have a duty to fully cooperate with an Ethics and Compliance investigation. We must provide all known information and must not withhold, destroy, or tamper with any records or other potential evidence related to the matter under investigation.

## Corrective action

If we approve or participate in actions violating the Code, company policies and procedures, laws or regulations or fail to fully cooperate in an investigation, we are subject to corrective action. Corrective action may include termination of employment in the case of an associate, or termination of assignment or relationship with Anthem for those in other roles.

## Disclosure

We are committed to making appropriate disclosures to regulators, business partners, government agencies and law enforcement authorities.



Violation of this Code may result in corrective action including termination of employment or contract.

“ *Your ethical muscle grows stronger every time you choose right over wrong.* ”

– Price Pritchett



## Our work environment

We are committed to a safe and healthy work environment. Creating an atmosphere of honesty and respect enhances our relationships with our coworkers, customers and business partners.

The policies mentioned in this section should be read by going to the [Human Resources](#) site.

### Alcohol and drug-free workplace

We are expected to report to work free from the influence of illegal drugs and alcohol. Possessing, selling, manufacturing or distributing illegal drugs on company property at any location is prohibited. The only exception is if senior management has specifically approved the possession and serving of alcoholic beverages for special events.

In addition, keeping illegal substances in our vehicles while on company-owned or leased property is not allowed. Searches of personal and company property located on company-owned or leased property may occur at any time. A violation of the company's [policy](#) on alcohol and drug-free workplace may result in corrective action including termination of employment.

### Drug/alcohol testing

If your manager has reasonable suspicion you are under the influence of drugs and/or alcohol, you may be required to submit to alcohol and/or drug testing. In addition, possession of paraphernalia is reasonable suspicion to support testing. Refusing to submit to testing may result in corrective action, including termination of employment.

The Drug-Free Workplace law requires anyone working on a government contract to notify their manager within five days of any drug-related criminal conviction.

Anthem has an Employee Assistance Program (EAP) for associates who are seeking drug counseling, rehabilitation and other employee assistance programs.

### Workplace violence

If we experience or have knowledge of any threatening behavior, we should immediately report it to our manager or Human Resources. Our work environment is expected to be free from acts of violence, threats, harassment, intimidation or other disruptive behavior.

This [policy](#) applies while we are at work or while conducting company business. All threats (even in jest) are serious and may result in corrective action including termination of employment.

### Weapons

Weapons are prohibited on company-owned or leased property (subject to individual states' laws) and while conducting company business.

## Qualification of associates

We believe hiring the best-qualified applicants contributes to our success. Background checks are conducted on all associates and temporary workers.

## Employment of government personnel

Federal government personnel hiring is governed by federal law. Contact the [Ethics Department](#) before discussing employment or consulting arrangements with current or former federal government employees.

When considering hiring former state government employees, the hiring Manager is responsible to ensure no conflicts of interest exist with their Anthem duties and the individual's previous state employment. Contact the [Ethics Department](#) with questions.

## Equal employment opportunity and affirmative action

We provide equal opportunity in employment to all associates and applicants. Nobody shall be discriminated against in employment because of race, color, religion, sex, gender (including gender identity), age, national origin, marital status, sexual orientation, veteran status, disability, genetic information, or any other status or condition protected by applicable federal, state or local laws, except where a bona fide occupational qualification applies.

## Solicitation and distribution of materials

We may not solicit other associates or distribute non-work-related literature or materials during work time and in work areas. Solicitation or distribution for any purpose by non-associates is not allowed on company property unless approved by senior management. Distribution includes the distribution or posting of literature, pamphlets, chain letters, personal business cards or any other written or printed material of any kind, including electronic mail. In addition, the use of office supplies for non-company sponsored solicitation activities is prohibited. There are limited exceptions to this [policy](#). Contact [Associate Relations Resource Team \(AART\)](#) with questions.

## Discrimination and harassment

We are committed to a work environment free from discrimination and harassment. We forbid discriminatory harassment with respect to race, color, religion, sex, gender (including gender identity), age, national origin, marital status, sexual orientation, veteran status, disability, genetic information, or any other status or condition protected by federal, state or local laws. In addition, we are prohibited from retaliating against others for reporting what they believe to be a violation of this [policy](#).

## Sexual harassment

Sexual harassment is prohibited. It may take many forms, including unwelcome sexual advances, requests or demands for sexual favors and other visual, verbal or physical conduct of a sexual or gender-based nature when:

- Submission to or rejection of such conduct is used as a basis for employment decisions such as, but not limited to promotions, transfers, appraisal ratings, corrective action, training opportunities, salary treatment or job assignments.
- Submission to such conduct is made either explicitly or implicitly as a term or condition of employment.
- Such conduct has the purpose or effect of unreasonably interfering with an associate's work performance or creating an intimidating, hostile, or offensive work environment.



### Living our values: Diversity

Anthem has an open door policy. This means we should feel free to voice any concerns to managers at any time. We are encouraged to report any incident of alleged discrimination, discriminatory harassment or sexual harassment to our manager, any member of the management team or the [Associate Relations Resource Team \(ARRT\)](#).



## Protecting our information

We have many types of information vital to conducting our business. This includes material and nonpublic information as well as other [confidential and proprietary information](#) about our:

- Strategies, products, processes, services and financials.
- Members, providers, associates, vendors, agents, business partners and government contracts.

We must never use or disclose our confidential, proprietary, private and/or material non-public information (Confidential Information) unless authorized by company policy in connection with a legitimate business need. In addition, we must never use or disclose a third party's Confidential Information learned in the course of doing business with them without proper authorization and approvals.

### Confidential and proprietary information about our business

Anthem's confidential and proprietary information includes any information not shared with individuals outside of the company, and any information useful to our competitors.

It is everyone's responsibility to help ensure our confidential and proprietary information is used only when authorized by policy and for valid business purposes. We are obligated to protect this information from improper use or disclosure even after our employment ends.

Work product developed as an Anthem associate remains Anthem property. We may not take customer/member lists, formulas, processes, contracts, trade secrets, intellectual property, sales-related information, or any other company confidential or proprietary information with us when our employment with Anthem ends.

### Living our values: Agility

In order to achieve the correct business results, never compromise your value of integrity, honesty and ethics to achieve them.

## Confidential information about our members

Federal, state and local laws govern our use and disclosure of our members' and beneficiaries' health, financial or any other private information.

Never access or share any member or beneficiary confidential information, unless authorized by policy and our assigned job duties require us to do so. We must maintain the trust of our members and beneficiaries and keep their information confidential.

In addition, never access claims or confidential information about ourselves, family members, or those with whom we have a personal relationship, including, but not limited to, significant others, roommates, friends, in-laws or neighbors regarding health coverage or other services provided by Anthem. You, and those with whom you have a personal relationship, must utilize the appropriate Customer Service channels to address any matters.

## Confidential information about our associates

Never access or provide confidential associate information unless it is: authorized by policy, for a valid business purpose, and required by our assigned job duties. Nothing in this section or the company's policies intends to or will be applied in a manner to limit associates rights to discuss and share wage/salary data, claims and medical information, employment agreement, Social Security number, financial and banking information and other personnel information with each other and with outside entities as protected by the National Labor Relations Act and other relevant laws.

## Q&A

**Q. I work in Sales and my job duties allow me to access claims data. My sister wants copies of all her Explanation of Benefits (EOBs) for the current year. She asked me to get copies for her. Can I do this?**

**A.** No. Although your sister has given you permission, you are not authorized as part of your job responsibilities. Your sister must contact Customer Service.

**Q. I worked long hours for Anthem developing my customer contacts. I recently accepted a similar position with a competitor. Can I keep the client lists I worked so hard to develop?**

**A.** No. Anthem customer/member lists and other proprietary information developed while at Anthem are owned by Anthem. Anthem reserves the right to contact your new employer if we have reason to believe you have taken proprietary information. This could impact your relationship with your new employer. In addition, you must return all Anthem provided equipment and records upon departure.

**Q. What is material information?**

**A.** Information is generally considered material if a reasonable investor would consider it important in making a decision to buy, sell or hold company securities.

**Q. What is nonpublic information?**

**A.** It is information that the public does not know. Generally, this means that the information has not been in a press release or media.

## Material nonpublic or inside information about our company

Laws and company policies do not allow us to use or disclose [material nonpublic](#) or inside information for your personal financial benefit or the financial benefit of family, friends or others.

We must not buy or sell Anthem or other publicly traded companies securities if we know material nonpublic or inside information. In addition, we must not share or disclose material nonpublic or inside information with coworkers, family, friends or others.

Before trading in Anthem securities, company directors, officers and all associates should consult and comply with our public company [policies](#).





## Confidential information about our providers, vendors and business partners

Never access or share confidential information about our providers, vendors and other business partners unless it is authorized by policy, for a valid business purpose and required by our assigned job duties.

## Requests for confidential information related to government contracts

Much of the information produced under government contracts belongs to the government entity for which the work is being performed. The Freedom of Information Act, HIPAA, Privacy Act of 1974 and other applicable state law equivalents govern the release, use and dissemination of this information.

## Third-party confidential and proprietary information

Anthem prohibits the use or disclosure of the confidential or proprietary information of prior employer, or other third party, whether or not a competitor at Anthem. Sharing such information can violate laws or contract requirements, damage our integrity and exposes us and the company to liability. Improper use of this type of information may result in corrective action including termination of employment and legal action.

If we receive any unauthorized nonpublic, confidential or proprietary information about any third party, we must immediately:

- STOP reviewing the document(s).
- Contact the [Legal Department](#). Be prepared to describe the specifics of receipt (time, date, means of receipt, people involved and extent of review/use).

Do not use, forward, copy, delete or destroy the information unless instructed to do so by the [Legal Department](#).

## Documenting and reporting information

Accurate, complete and truthful financial, operational and other business records are vital to our decision-making processes. They directly impact our reporting of financial, legal and regulatory information.

Inaccurate financial or operational information provided in connection with certifications of government contracts and other entities is strictly prohibited.

In addition, undisclosed or undocumented (unrecorded) accounts, funds or assets are not allowed. Company funds should never be placed in any personal or non-corporate account.

## Media relations

In order to provide accurate and complete information about Anthem's business to the media, investment analysts and the investor community, Anthem will respond to the news media in a timely and professional manner only through its designated spokespersons, per [policy](#). Associates should contact Corporate Communications if a media outreach is received.

## Use of company assets

We should only use company funds, equipment and other assets to conduct business, or for other reasons approved by your manager. Company assets, such as telephone and email, are to be used in a professional, productive, ethical and lawful manner. We must not use, sell or dispose of company assets unless allowed by policy.

### Electronic assets

We use a variety of equipment to conduct our business. We must follow policies relating to these assets. We may use some equipment for personal use, in a limited manner, as long as your manager approves and your personal use:

- Does not affect productivity.
- Does not result in a direct, material cost to the company.
- Follows applicable company [policies](#) and the law.

Anthem has the right to review, record, copy, audit, investigate, intercept, access and disclose any use of the computer, email, Internet, Intranet, instant messages, voicemail and telephone including all messages created, received or sent for any purpose. The contents of electronic storage (including but not limited to email) may be disclosed within the company to those who have a need to know and outside the company (including law enforcement or government agencies), without your knowledge or permission.

### Passwords and access codes

Never share passwords or access codes with anyone, per [policy](#).

We do not have an expectation of privacy in the electronic messaging systems used during our employment or assignment with Anthem. Our communications may be reviewed as part of a legal matter, Ethics and Compliance investigation or whenever deemed necessary at the company's sole discretion.

## Q&A

### Q. What are some examples of company assets?

- Cash, checks and company credit cards
- Buildings and fixtures
- Office supplies
- Computer hardware and software
- Documents, information/data and records
- Fax machines and copiers
- Telephones and voicemail systems
- Email, Intranet and Internet access

### Q. Company assets may not be used for:

- Illegal activity
- Personal gain
- Solicitation of personal business
- Sale of any services or products other than Anthem's
- Public advancement of individual views
- Harassment of any type
- Creating, viewing, receiving, sending or downloading chain email (including jokes)
- Sexually explicit material
- Inflammatory or derogatory communications

**Company assets must be returned immediately upon departure (termination of employment).**





## Q&A

**Q. I want to livestream from my workspace so my friends and family can see what I do on my job. Is that okay?**

**A.** No. Photos, videos and recordings are not permitted in work areas. Protected Health Information or other confidential data may appear in the photo or be overheard that could lead to a non-permitted disclosure of protected health information. Posting such images or information to social media could lead to sanctions or corrective action, including termination, or state or federal enforcement action against you by regulators.

## Software

In accordance with the IT Asset Management [policy](#), we cannot copy or use illegal or unauthorized software on Anthem's electronic assets or computer networks. NGS associates can locate the policy [here](#).

## Social networking

If we participate in electronic communication such as social network sites, blogs, chat rooms, Facebook, Twitter, Instagram, Periscope and similar forms of communication, we must not disclose Anthem's confidential information. We are expected to consider company [policies](#) and the ramifications of all of your communications, both internally and externally. We must also make it clear the views we express are ours alone and not Anthem's views. The content of our messages may not be discriminatory or harassing towards any person or entity including other associates, managers, members, competitors or any business partners of the company.

## Record retention and destruction

We are committed to complying with the recordkeeping requirements of applicable laws. Destroying or disposing of company records is not at our individual discretion. The [Anthem Records Management](#) program governs record retention and the appropriate disposition of records once the applicable retention period has expired. In addition, records relevant to actual or anticipated litigation, or government investigations, may not be altered or destroyed and must be preserved.

Destruction or alteration of records to avoid disclosure in a legal proceeding, government investigation or audit is strictly prohibited and may constitute a criminal offense.

Before destroying records, we are required to check the [Record Retention policy](#) to determine if the applicable retention period has expired. We must also check with our manager or the [Legal Department](#) to determine if the records are the subject of a Legal Hold Notice. If so, the records must be preserved and may not be altered or destroyed without approval from the Legal Department, even if the regular retention period has expired. NGS associates should follow the [NGS Record Control Procedure](#).

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

– Oprah Winfrey

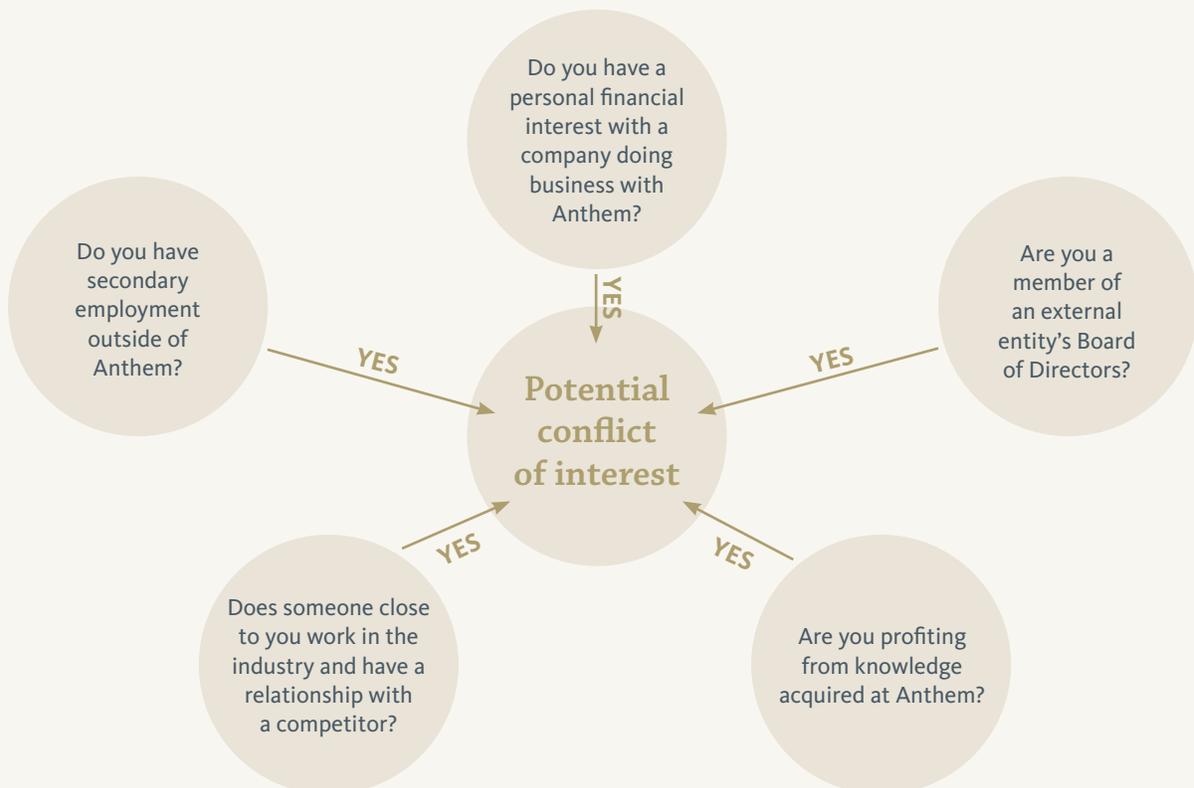


## On our own time

We are required to perform our responsibilities in a manner that furthers Anthem’s interests. We must not compromise those interests due to actual or perceived conflicts with other business or personal concerns. A conflict of interest arises when your personal interests or activities appear to influence, or may influence, your ability to act in the best interests of Anthem.

### How do I know if I have a conflict of interest?

Ask yourself the following questions:



If you answer “yes” to any of these questions seek guidance from the [Ethics Department](#).

## Conflict of interest – disclosure

New and rehired associates must complete a [Conflict of Interest](#) survey within 30 days of receiving the assigned survey. Directors, officers, managers and associates on subsidiary boards of directors must complete a Conflict of Interest survey on an annual basis. In addition, when our job responsibilities, outside activities or personal relationships change, we are required to disclose any potential conflicts of interest. To help avoid a potential conflict of interest in any of the following situations, we should discuss with our manager and contact the [Ethics Department](#) to update our conflict of interest form.

## Personal financial interest

We may not own, directly or indirectly, a [significant financial interest](#) in any business that does business with, seeks to do business with, or competes with Anthem.

We must not refer customers, members, beneficiaries or anyone who does business with the company to an entity in which we or a family member has a financial or other material interest.

Some unique situations may qualify as an exception to this policy and will be addressed on an individual case-by-case basis. Exceptions to this policy may require the written approval of the Chief Compliance Officer.

## Family and personal relationships

Employment of relatives and individuals involved in personal relationships with associates is allowed as long as those individuals are the best-qualified candidates for the job, and it is not a [prohibited relationship](#).



If you reside on an external entity's board of directors, the Ethics Department must be notified, as this may require pre-approval from the Chief Executive Officer.

## Living our values: Integrity

We must avoid even a perception our outside activities conflict with our ability to do our job.

## Outside employment and other activities

Our primary employment obligation is to Anthem. Any activities such as a second job, a member of an external board of directors or operating personal business must not conflict with our obligations to Anthem. In most cases, a mitigation plan can be developed to help prevent any actual or perceived conflicts. In addition, we may not use company time, name, assets or the services of other associates for any outside activities unless authorized by company [policy](#).

## Political activity and contributions

Applicable laws restrict the use of corporate funds and assets in connection with elections. Unless authorized in accordance with established corporate policy, we should only use personal property, facilities and time for any personal political activity. We may use our own personal funds to make [political contributions](#) to any candidate, office holder or political organization. However, all political contributions to a candidate, office holder or political organization for, or on behalf of Anthem, must go through [Anthem's Public Affairs Department](#) and require the approval of the Senior Vice President of Public Affairs.

If eligible by Federal Law, we may voluntarily support Anthem's employee-funded political action committee – Anthem PAC. We are also encouraged to attend candidate forums, appearances by public officials and other programs sponsored by Anthem.

## Lobbying/contacting elected officials, regulators or state government agencies

There are strictly enforced federal and state laws regarding contacting elected officials, regulators and state government agencies (referred to as covered entities). In addition, our contracts with federal and state agencies may include restrictions on lobbying or other contacts (including business development) with elected officials and regulators. If we have a business need to meet with any of the above listed covered entities, we must first contact Anthem's Public Affairs Department for guidance. If we are contacting any of these covered entities outside of our official capacity with the company, we must let it be known the views expressed are ours alone and not those of Anthem.

Federal law prohibits gifts to Executive and Legislative branch officials, including, among other things, tickets, travel, food and logo items. Many state and local laws also have prohibitions or restrictions. We must request prior approval from Anthem's Public Affairs Department before giving a gift to a state or local government official.

Contact the Anthem [Public Affairs Department](#) with questions.

## Q&A

### Q. What should I remember, when I participate in personal volunteer political fundraising or other political activities?

- Only conduct the activity on your own personal time.
- Only collect political contributions on personal property.
- Only use your own personal stationery and postage, or the campaign's stationery or postage.
- Only type letters and political communications from home.
- Return any RSVP to the campaign, to a home office, a personal email address, a personal telephone number or to a post office box not associated with Anthem.





## Conducting Anthem's business

We obtain business on the merits of our products, services and people. We strive to do business with organizations that also have high standards of business ethics and integrity. No matter what organization we are dealing with, or what its relationship is to Anthem, we must always observe the following general standards.

### Living our values: Community

Corporate responsibility is intrinsic to fulfilling our vision to be the most innovative, valuable and inclusive partner.

### Fairness

We all have a responsibility to deal fairly and honestly with anyone we do business with. The manner in which we conduct our business relationships affects our reputation, builds long-term trust and contributes to Anthem's success.

### Community service

The Anthem Foundation is a private, non-profit organization funded by Anthem, Inc. Through national and local grants, we partner with community organizations on initiatives that help address social drivers that will create a healthier generation of Americans.

Through charitable corporate contributions and local sponsorships, Anthem's Community Relations Investments strategically support and enhance our Foundation partnerships. In addition to providing health-related grants, the Foundation also matches the funds Anthem associates donate through our Dollars for Dollars Program, and encourages associate community engagement through our portfolio of volunteer programs. Through our disaster relief efforts and Anthem Cares Fund, and our Memorial Scholarship Fund, the company supports our associates, their families and communities in times of need.

### Environment

We are encouraged to minimize, reuse and recycle waste at our facilities, if possible. Consider the impact on the environment before printing. We can also help Anthem conserve energy by turning off computer monitors and unnecessary lighting after business hours.

### Gifts and special courtesies

Use good judgment and discretion to avoid even the appearance of impropriety or obligation in giving or receiving gifts and entertainment. We should be certain any gift given or received, or entertainment hosted or attended does not violate the law, customary business practices or the Code.

## Gifts and special courtesies – acceptance

All associates should refer to the [Gifts and Special Courtesies policy](#) before accepting any gift. We will not accept any gift valued at more than \$100 (or \$200 from any vendor during a calendar year). Some of us working in procurement and/or certain government business units, are limited by department policy and cannot accept any gifts. We should consult our manager and/or business unit's compliance contact with questions.

### Accepting prize drawings

We may accept items given away in prize drawings at health fairs and industry conferences provided:

- The event is a bona fide, legitimate giveaway.
- Everyone has the same opportunity or chance to win (not buying a chance to win).
- The prize is not excessive or inappropriate to the occasion.
- The prize is not cash.
- We are not placed under any obligation for having entered and winning the prize item (for example, an obligation to use a specific company's services or to provide the sponsoring company with your business attention).

In all instances, no matter what the value of a prize, we do not accept any prize that might influence our decision making or otherwise compromise our ability to act in the best interests of Anthem.

We may accept gift cards from external sources if the gift cards cannot be redeemed for cash and do not violate our [gift policy](#) limits.

## Gift and special courtesies – offering

All associates should refer to the [Gifts and Special Courtesies policy](#) before offering any gift. We will not offer any gift valued at more than \$100 (or \$200 to any recipient during a calendar year). Some of us working in procurement and/or certain government business units, are accountable for knowing and complying with specific business unit policies on gifts and special courtesies, as more stringent exceptions may apply. We should consult our manager and/or business unit's compliance contact with questions.

In most cases, we do not offer or receive gifts to or from government officials. Any exception must be pre-approved by Anthem's Chief Compliance Officer and at least a Vice President of the business unit conducting the activity.

Individual business units should track their gifts offered to external sources to monitor gift policy compliance. There are special rules for gifts to government employees as outlined in the political activity and contributions sections of this Code.

Offering gift cards to external sources is permitted, on a limited basis, such as part of an approved wellness or marketing incentive program. All associates should refer to the policy on [Gift Cards & Gift Certificates](#).

Gifts purchased and expensed to the company that violate the [gift policy](#) dollar limits may be denied expense reimbursement, and corrective action may be taken up to and including termination of employment.

## Q&A

**Q. A company vendor gave me a \$25 gift card to my favorite restaurant as a thank you for helping them meet a project deadline. Can I accept the gift card?**

**A. Yes, you may accept the gift card in most circumstances.**



**Q. A vendor sent me a gift basket of cookies valued at \$150 to thank me for helping on a project. Can I keep it?**

**A. Yes, if your manager approves, you do not work in Procurement or a business unit servicing a government contract, and you share the cookies with the department.**

**Q. My team would like to give a \$50 gift card to a provider's office manager for helping us identify a claim error. Are we allowed to give her a gift card?**

**A. No. See policy on [Gift Cards & Gift Certificates](#) for further guidance.**



## Discounts

Anthem may provide discounts if they are:

- Of nominal value.
- Reasonable, based upon the circumstances.
- Only offered to existing members for health-related products or based on health-related activities, and the discount is not generally available to the public.

Always check with the [Legal Department](#) to determine current requirements before offering a discount.

## Business entertainment

Our relationship with vendors, customers and prospective customers may include business entertainment functions. Business matters are discussed as part of business entertainment even where it is apparent the event is not intended solely as a business meeting. When we provide or accept business entertainment, both an Anthem associate and the vendor, customer or prospective customer must be present at the event. Business entertainment includes, but is not limited to:

- Meals
- Charitable and sporting events
- Golf, spas and parties
- Plays and concerts
- Industry conferences
- Other events where business matters are discussed

We must display socially appropriate behavior during business entertainment events.

When any business entertainment involves government officials, we must ensure it is reasonable and does not violate the company's gift [policy](#), Global Anticorruption policy and various laws such as the Foreign Corrupt Practices Act., U.K. Antibribery Act of 2010 and various other countries' laws prohibiting bribery and corruption. Before participating in business entertainment, consult with your manager and review [Anthem's Gift, Global Anticorruption](#) and [Travel and Expense policies](#).

Anthem's [Travel & Expense Reimbursement](#) policy requires management pre-approval for business entertainment over \$200 per person/per event. Any business entertainment over \$1,000 must be pre-approved in writing by an Executive Vice President.

**“ Integrity gives you real freedom. You have nothing to fear since you have nothing to hide. ”**

– Zig Ziglar

## Anti-rebating statutes – offering gifts to customers and potential customers

Anti-rebating laws prohibit any person representing Anthem from offering our customers or prospective customers the following in an attempt to solicit or induce the purchase of our products or services:

- Employment
- Shares of stock or other securities
- Any advisory board contract, or any similar contract, agreement or understanding, offer providing for or promising any profits or special returns or special dividends
- Any prizes, goods, merchandise or property of an aggregate value in excess of individual state guidelines or local law

Always check with the [Legal Department](#) to determine individual states' current requirements.

## Antitrust laws

We comply with applicable antitrust laws. We independently determine the pricing structure of our products and provider contracts, subject to applicable regulatory review.

Antitrust laws are intended to provide customers with a variety of products at competitive prices unrestricted by artificial constraints such as price fixing, illegal cartels and boycotts. Contact the [Legal Department](#) and refer to the [Antitrust Compliance policy](#) with questions about the kinds of conduct that could implicate antitrust laws.

## Procurement

We must maintain an honest, objective and efficient procurement process. The purchase of materials and services must be in accordance with our [procurement policies](#).

Purchasing decisions must be based solely on predetermined selection criteria, including, but not limited to, quality, performance and price. Relations with suppliers must be maintained on an objective basis, free from the influence of gifts and favors.

All buying and selling decisions must be independent. Anthem associates who are in positions to influence purchasing decisions for Anthem, must be able to recognize reciprocity and consult with the [Legal Department](#) and/or the [Ethics Department](#) about its implications when potential reciprocity is identified.

In addition, we have a [Supplier Code of Conduct](#), which all of our vendors must adhere to while they are conducting business with and/or on behalf of Anthem. Vendors are responsible for ensuring that their employees and subcontractors adhere to our Supplier Code of Conduct. The NGS Supplier Code of Conduct is located on the Internet at [www.ngsservices.com](http://www.ngsservices.com).

## Q&A



**Q. A vendor invited me to a round of golf and dinner to discuss their current contract performance and other related matters. Can I accept the offer?**

A. Yes, if the value of the dinner and golf is over \$200, you must receive advance approval from your manager.

**Q. I pre-purchased some professional basketball tickets to take a vendor with me to a game. I had an unexpected personal emergency, and now cannot go to the game with the vendor. I do not want these tickets to be wasted. Can I just give them to the vendor?**

A. If the value of the tickets is under \$100, and you have not reached the \$200 annual limit in a calendar year with this vendor, you can give them the tickets as a gift.

If the tickets are greater than \$100 in value, you normally cannot give the tickets as a "gift," as it would violate our gift policy. You should instead find another associate(s) who could accompany the vendor to the game for business entertainment purposes. See the [Travel and Expense Reimbursement](#) policy.



## Kickbacks

We may not offer, solicit an offer, provide or receive kickbacks of any kind. Anti-kickback laws impose criminal and civil monetary penalties on individuals and companies who offer, give, solicit or accept a kickback. Even an attempt to offer a kickback or an attempt to obtain a kickback may violate the law.

The scope of this prohibition is far reaching and can include things such as: self-referrals by members in exchange for incentives and referrals to enroll in any of our products receiving federal or state funding and incentives to encourage providers to steer members to us. The laws prohibiting kickbacks are very broad and cover many of our relationships with vendors, providers, brokers and potentially even our members. The [Legal Department](#) should be consulted before offering, giving, soliciting, or receiving anything of value that is not a bona fide, fair market value payment for actual services or items provided.

We must not, directly or indirectly, make or offer bribes or kickbacks to any third party, for the purpose of wrongfully obtaining, retaining or directing our business. This includes giving, favors, preferential hiring or anything of value to any government official.

## Q&A

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### Q.What does a kickback typically involve?

A. A kickback can be money, gifts, entertainment, services or anything else of value.

A kickback is giving, offering, soliciting or receiving anything of value in an attempt to induce referrals or as a reward for referring a person to any person or entity to receive items or services paid for by a health care program (includes Medicare Advantage, state Medicaid and CHIP programs, among others) or in connection with a prime federal government contract.

## Vendor relationships

External sources such as vendors, pharmaceutical manufacturers or physicians may offer cash, materials, services or equipment to be used for company activities like member or provider education and disease management programs. These offers have the potential to be perceived as bribes, kickbacks or unfair sales practices and could violate company policies and laws.

We may not:

- Receive cash directly or indirectly from an external source without any services or services of comparable value.
- Receive products or services for free or at less than fair market value, such as:
  - Materials to be distributed internally or externally.
  - Offers to perform member/provider mailings solely on our behalf at no cost to us.
  - Participation in joint activities, such as health fairs or other marketing activities.
  - Waiver of seminar fees.
  - Receive anything with more than a nominal value from an external source, for which no payment or payment of less than fair market value by the company is involved.

External sources such as charities, non-profits, professional societies, vendors, industry groups, public policy advisory groups and other external sources, may extend offers of paid travel and lodging expenses, waiver of conference fees, and compensation for participating in conferences, seminars or other meetings. Generally, if the sponsor is waiving the conference fees for all speakers at the event, and we are an invited speaker, then we can also accept the waived conference fees. However, any offers for honoraria, stipends or any other type of compensation offered must be declined.

## Q&A

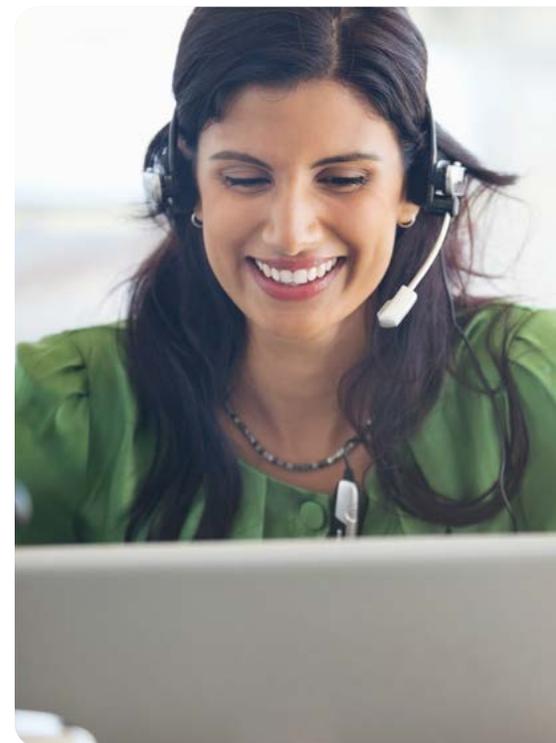
### Q. Can we endorse a vendor's product?

A. Our general policy is to decline vendor requests unless the circumstances warrant an exception to our policy. The [Supplier Requests to Reference Anthem Company Names and/or Brands policy](#) allows for exceptions, which are granted on a case-by-case basis. A vendor cannot use Anthem as a reference without an approved policy exception. Contact Corporate Communications with any questions regarding requests for endorsements or to request a policy exception.

### Q. A current vendor has offered to pay for our travel and lodging expenses to visit their headquarters. Can my team accept the offer?

A. Generally, no, unless there is contractual language in the vendor contract covering the vendor paying for Anthem associates to conduct site visits, inspections or training. Anthem must pay for the expenses related to traveling to the vendor's locations for legitimate business reasons. The Ethics Department must review and approve any unique situations where a policy exception may be granted.

Some limited offers of paid travel and lodging expenses from professional societies, charities, industry associations, public policy development groups and non-health care vendors may be allowed. Any offers extended to us by event organizers to pay for our travel/lodging expenses require review and approval from the Ethics Department. Contact the [Ethics Department](#) to review the offer before accepting.





## Business relationships with pharmaceutical manufacturers

Any compensation received directly or indirectly from a drug company is subject to both state and federal regulation. Such compensation creates a potential for the compensation to influence, or appear to influence, our business decisions regarding our coverage of drugs or utilization management decisions. Certain highly trained associates at IngenioRx have the responsibility to negotiate with drug companies and no associate should engage in any activity that gives rise to compensation from a drug company without consulting the [Legal Department](#).

## Broker compensation

We are committed to disclosing all broker compensation. Our [Broker Compensation Disclosure policy](#) governs the compensation related to the sales and distribution of our products when using an external sales distribution system. The policy applies to individuals and entities paid by Anthem. Due to the complexity of legal requirements, contact the [Legal Department](#) for guidance.

## Business agreements

All business agreements must be in writing and clearly state the services to be performed, the basis for earning the commission or fee, and the rate or fee.

## Other key laws that impact our business

### The Telephone Consumer Protection Act of 1991

The Telephone Consumer Protection Act of 1991 (TCPA) regulates the way we place calls and send text messages to consumers. [Anthem's Telecommunications policy](#) sets forth how to comply with the TCPA and other related laws, and honor consumer requests to be placed on Anthem's Do Not Call list. FGS' Telecommunications policy is located in the FGS RISE Pulse Community.

### Non-Discrimination under the Affordable Care Act

In the context of insurance contracts issued under the Affordable Care Act (ACA), health insurers cannot exclude from participation in, deny benefits of, or subject to discrimination any person based on race, color, national origin, sex, age (if 40 or over) or disability status.

With regard to offering group or individual health insurance coverage, Anthem cannot discriminate with respect to participation under the plan or coverage against any health care provider who is acting within the scope of that provider's license or certification under applicable state law. However, Anthem is not required to contract with any health care provider and Anthem may establish varying reimbursement rates based on a provider's quality or performance measures. Also, see our Prohibition on Discrimination in Marketing and Enrollment pertaining to government business contracts in the Doing Business with the Government section.

“ *Supporting the truth, even when it is unpopular, shows the capacity for honesty and integrity.* ”

– Steve Brunkhorst



## Doing business with the Government

Much of our business comes from contracting directly with U.S. federal and state governments. Please note, this section primarily deals with U.S. operations, business conducted outside the U.S. may be subject to the laws and regulations of other countries as well. Business units performing U.S. government contracts (federal, state or local) must comply with additional laws and program requirements. If we are unsure of these additional requirements, contact our manager or business unit's Compliance team for guidance.

### Monitoring for excluded persons

In our role as a government health care program contractor, Anthem may not employ or contract with individuals or companies barred from taking part in such programs, or receiving funds from such programs. To meet this obligation, we screen our associates, providers, vendors, and our first tier, downstream and related entities against exclusion lists kept by the Office of Inspector General (OIG) and General Services Administration (GSA) before hiring or entering into contracts.

We must also re-screen associates, providers and others on a regular basis. We also require first tier, downstream and related entities supporting state and federal health care programs to screen and rescreen their employees and subcontractors against the OIG and GSA lists in the same manner.

We should consult with our manager or our business unit's Compliance team for the screening policies applicable to our business unit.

## Prohibition on discrimination in marketing and enrollment

Anthem does not take part in any discriminatory marketing, enrollment, disenrollment, medical management, benefit design, provider contracting, or other policy or practice designed to inappropriately prevent or discourage enrollment in, or encourage disenrollment from a health plan based on race, color, ethnicity, national origin, religion, age, gender, gender identity, mental or physical disabilities, sexual orientation, genetic information, including pregnancy and expected length of life, present or predicted disability, degree of medical dependency, quality of life, or other health condition or health status.

Health factors that may not be considered for marketing or enrollment purposes include medical condition, claims experience, use of health care service, medical history, genetic information, evidence of insurability and disability (subject to special rules relating to end-stage renal disease under Medicare Advantage plans).

Federal laws also forbid discrimination against providers serving high-risk groups or specialize in conditions requiring costly treatment. We will not select or reject providers based on these factors.

All of our government sponsored health plans are subject to restrictions on, and requirements for, marketing and other promotional and/or sales activities and the content of materials. They also require that sales and marketing presentations fairly and accurately describe our products and avoid misleading consumers.

If these considerations are applicable to our job responsibilities, we should seek guidance from our manager.

## False Claims Act and False Statements Act

The federal [False Claims Act \(FCA\)](#) imposes civil and criminal penalties on those who defraud the U.S. government and/or improperly act to avoid paying money to the U.S. government (e.g., keeping money the government paid in error). Also, many states have enacted their own versions of the FCA.

The False Statements Accountability Act imposes criminal penalties on anyone who falsifies or covers up a material fact in connection with a U.S. government matter (including U.S. government contracts).

## Stark Law

The Stark Law is a health care fraud and abuse law that prohibits physicians from referring individuals for specified “designated health services” for which Medicare pays any entity in which the physician has a “financial relationship.” The term “financial relationship” includes any direct or indirect ownership or investment interest by the referring physician, as well as, any financial interests held by any of the physician’s family members. The government can bring a civil action against Stark Law violators under the civil monetary penalties law. Stark Law violations can result in penalties of up to \$15,000 for each billed service that is based on a prohibited referral, as well as three times the amount of the government overpayment. Contact the [Legal Department](#) regarding any concerns about Stark compliance.

## Obstruction of a Federal Audit

We do not wrongfully influence, obstruct or impede a federal auditor in the performance of official duties. Failure to permit access to a federal auditor may result in penalties up to \$15,000 per day.

## Restrictions on Obtaining and Disclosing Certain Information

The Restrictions on Obtaining and Disclosing Certain Information restricts the activities of government contractors and individuals or companies seeking contracts with the government.

We may not:

- Offer gifts or anything of value to government officials or competing contractor.
- Discuss future employment possibilities with government officials or competing contractor.
- Offer to pay fees contingent upon the award of a federal contract to an employee or third party who holds itself out as being able to obtain the contract through improper influence.
- Solicit or obtain from government officials, any proprietary information about competitors or source selection information that is not publicly available including, but not limited to:
  - Proposed prices
  - Source selection plans
  - Technical evaluation plans
  - Anthem or competitors' proposed prices or costs
  - Anthem or competitors' approaches, processes, operations or techniques
  - Anthem or competitors' information identified as contractor bids, proposal information or restricted data

The same guidelines apply when interacting with competitors.

## Truthful Cost or Pricing Data Act

Under certain U.S. government procurements, contractors and subcontractors are required to submit certified cost or pricing data to the government. Knowingly violating can result in criminal and civil penalties.

If we are involved in U.S. government contracting, we may be asked to sign such a certification. We should consult with the [Legal Department](#) before signing such a certification. Retain copies of information related to costs or pricing provided in connection with a U.S. government contract. Typically, we maintain our U.S. government records for ten years. Contact the [Legal Department](#) with questions.





## Doing business across the globe

Whether based in the United States or in another country, we are responsible for conducting business in accordance with the laws of all impacted countries. We are subject to local laws, regulations and jurisdictions. Contact your manager, the [Legal Department](#) or the [Ethics Department](#) with questions.

### Bribery and corruption

Anthem prohibits any form of bribery or corruption, whether in commercial dealings with private parties or in dealings

with officials of any government. We are committed to complying with the U.S. Foreign Corrupt Practices Act (FCPA), the U.S. Travel Act, the U.K. Antibribery Act and all other applicable anti-bribery laws.

We must not, directly or indirectly through a third party, make or offer anything of value to anyone in order to improperly obtain or retain business or improperly influence any action to benefit Anthem. Anything of value can include gifts, services, favors or preferential hiring. We cannot arrange for a third party to provide anything of value.

We follow due diligence requirements before Anthem engages a third party to act on its behalf in conducting international business. Anthem has adopted approval procedures that must be followed when giving gifts, entertaining and engaging in certain sales and marketing activities with government officials. These activities require prior review and approval. Review [Anthem's Global Anticorruption policy](#) and a [Guide to Due Diligence of Third Parties Conducting International Business On Behalf of Anthem, Inc.](#) or contact the [Ethics Department](#) or the [Legal Department](#) with questions.

## Anti-boycott

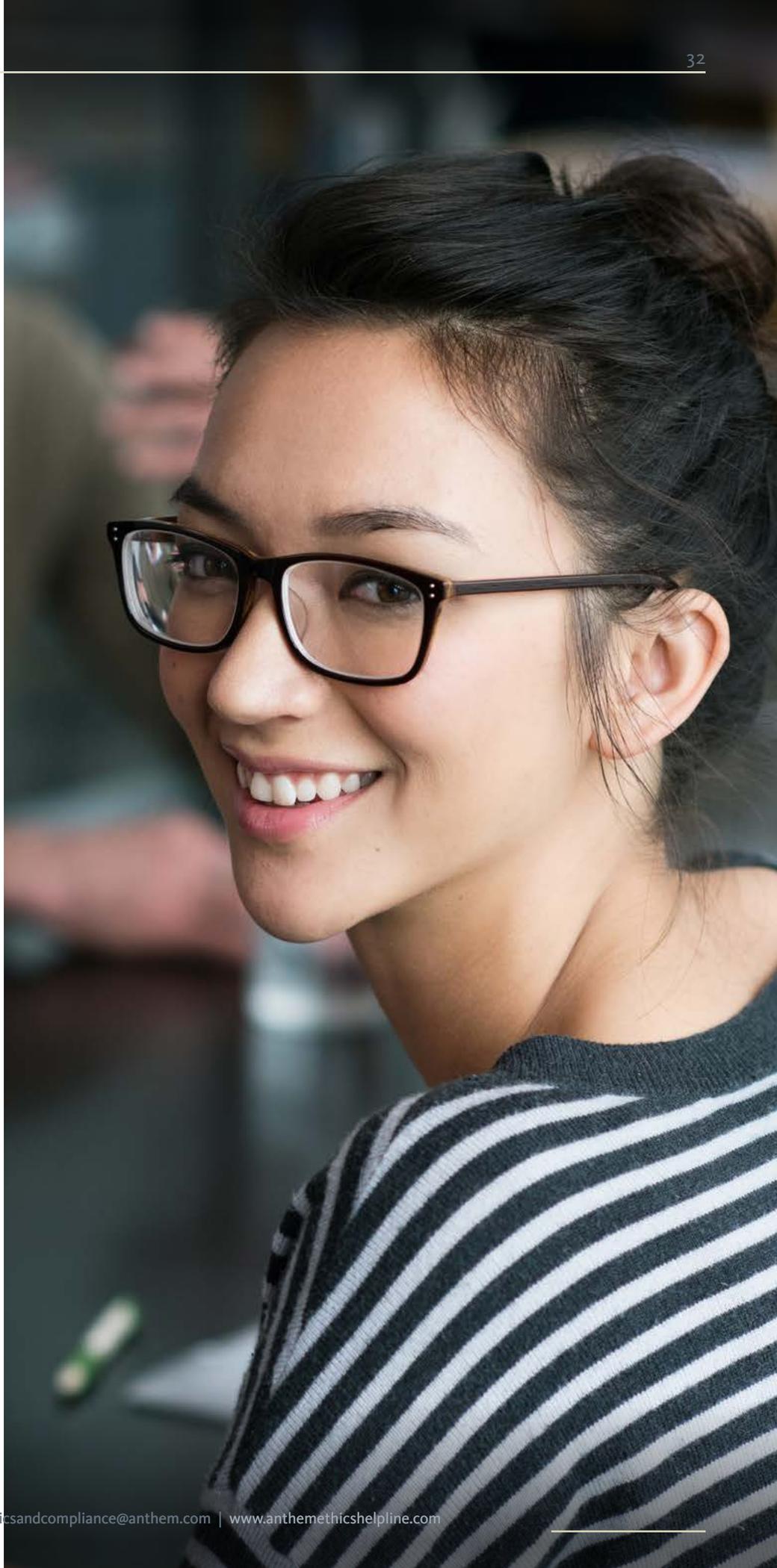
Anti-boycotting laws do not allow boycotting certain countries, goods and services, as well as discrimination.

## Barred countries/ Office of Foreign Asset Control Screening

The Office of Foreign Asset Control publishes a list of Specially Designated Nationals and Blocked Persons. All U.S. companies must screen all individuals and countries they do business with against the lists to ensure that the company does not do business with individuals or entities on the lists (unless a license is obtained). We conduct such screening to ensure there are no electronic wire transfers or other payments made to affected countries, entities or individuals.

## Human rights

We support basic human rights. If we become aware that any party to our business transactions is denying basic human rights, we must report the concern. Denied human rights can include lack of access to food and water, forced labor, child labor and other illegal and/or unethical activities.



# Anthem<sup>®</sup>

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