

Code of Ethical Business Conduct

GEHA.

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INTRODUCTION

The GEHA Board of Directors expects that all GEHA employees and business partners will conduct all business on behalf of GEHA and its subsidiaries in an ethical manner, with the highest level of integrity, and in compliance with all laws, regulations, contract requirements, and other legal requirements.

Our Code of Ethical Business Conduct is intended to provide you with certain standards and guidance as you endeavor to do “the right thing” every day. You are expected to comply with this Code while recognizing no single document can anticipate or address every situation you will encounter in your work on behalf of GEHA. When confronted with situations not addressed in this Code, you should: look to our Corporate Mission, Vision, Values and Compliance Commitment; use common sense; and exercise good judgment consistent with the intent and spirit of the Code.

GEHA offers annual training to help you understand and comply with GEHA’s Code of Ethical Business Conduct. It is important that you participate and pay attention, so you do not inadvertently compromise your or GEHA’s reputation or future. Similarly, it is important that you ask questions if you do not understand something in the Code or you are not sure what may be “the right thing” in a particular situation. Finally, it is critical that you “speak up” whenever you have questions or concerns.

Our Mission

We empower our members to be healthy and well.

Our Vision

We inspire our members to live their best lives in pursuit of their overall health and well-being.

Our Corporate Values

- Care for Our Members and Each Other
- Work as One Team
- Own It and Achieve Excellence
- Embrace Diversity, Equity, Inclusion, and Belonging
- Commitment to Growth and Improvement

Our Compliance Commitment

Promote an organizational culture that encourages ethical conduct and a commitment to compliance with the law.

ETHICAL EXPECTATIONS

- 1 Comply with the Law.** You must conduct all GEHA business in accordance with all applicable laws, regulations, contract requirements, and other legal requirements. This means, at a minimum, you must:
 - 1.1** Be aware of, understand, and comply with all obligations under all federal, state, and local laws, regulations, and ordinances, all government and other contractual requirements, and all other legal requirements. Such laws may include, but are not limited to, federal and state false claims acts, the Anti-Kickback Statute, the Fraud Enforcement and Recovery Act (FERA), the Affordable Care Act, and the Health Insurance Portability and Accountability Act (HIPAA), as well as all Medicare and Medicaid program requirements.
 - 1.2** Follow all contracting and purchasing policies and procedures, including only engaging in business relationships consistent with our Corporate Values and Ethical Expectations.
 - 1.3** Protect all confidential information, which includes personal and health information, in compliance with our HIPAA Privacy Program, cybersecurity and other information security policies, as well as our records and information governance policies.
 - 1.4** Safeguard all property and equipment belonging to GEHA or others, including GEHA's electronic systems.
 - 1.5** Never engage in any illegal or unethical activity, or any activity that may jeopardize our members or providers, your job or the jobs of others, our contracts or other business relationships, or the future of GEHA.
 - 1.6** Raise any questions or concerns regarding any specific laws, regulations, or contract requirements with the Compliance Officer (ComplianceOfficer@geha.com).
- 2 Act with Integrity.** It is extremely important that you maintain the highest standards of honesty and fairness when engaging in any activity on behalf of GEHA, particularly activities involving our members, providers, government agencies, and other business partners. At a minimum, you must:
 - 2.1** Be honest and forthright at all times, even when it is not in your personal interest.
 - 2.2** Only share information accurately and through appropriate channels.
 - 2.3** Never compromise the security of our computer systems, electronic information, or other systems or information.
 - 2.4** Never falsify documents; attempt to mislead anyone with incomplete documentation or information; or dispose of, hide, or otherwise destroy or inappropriately handle any documents (including claim forms, mail, and other production work).
 - 2.5** Never engage in dishonest, misleading, or fraudulent activity, or attempt to gain an unfair or unlawful advantage over another.

- 3 Avoid Fraud, Waste and Abuse.** We are committed to helping our members get the best value for their health care dollars. Consistent with this commitment, we expect that you will be aware of and fight against health care fraud, waste, and abuse, including cooperating openly and honestly with GEHA's internal investigators and attorneys, outside investigators and attorneys, and all local, state and federal agencies to report, investigate, and remediate health care fraud, waste, or abuse.
- 4 Be Aware of Conflicts of Interest.** We depend on you to avoid situations where your personal interests could conflict, or even appear to conflict, with our Corporate Values. You must be free of actual, apparent, or perceived conflicts of interest when dealing with people or entities on behalf of GEHA. You must not, for example, allow personal gain to influence your judgment when making business decisions. Business should be awarded solely on merit and a competitive basis, with the best value for GEHA in mind. You must thoroughly disclose all information related to any actual, apparent, or perceived conflicts of interest to GEHA's Compliance Officer (ComplianceOfficer@geha.com), as well as annually when you are asked to complete the Conflict of Interest Form. At a minimum, you must recognize and appropriately handle the following common conflicts of interest:
- 4.1 Close Personal Relationships.** You must make all business decisions consistent with our Corporate Values, free from the improper influence of your family members (e.g., spouse, brother or sister (whole or half-blood), spouse of brother or sister, children, grandchildren, and great-grandchildren) and close relatives (e.g., parents, grandparents, in-laws, stepchildren, and stepparents) as well as, depending on the situation, significant others (includes domestic partners) and close personal friends. Children, grandchildren and great-grandchildren are family members whether related to you by blood or through adoption. Among other things:
- a. You must disclose any family member, close relative, or significant other who works for another company or who is self-employed in any way related to GEHA, or who may impact GEHA or your work at GEHA, including (but not limited to) work with or for GEHA's competitors or business partners or a business or entity which exercises regulatory authority over GEHA.
 - b. You must not process claims, enrollment changes, or provider changes for anyone with whom you have a familial or close personal relationship; handle confidential, personal, or medical information regarding anyone with whom you have a familial or close personal relationship; or improperly direct business opportunities to, or provide a business advantage for, anyone with whom you have a familial or close personal relationship.
- 4.2 GEHA Resources.** You must protect GEHA's resources, including but not limited to, GEHA's property, equipment, computer programs, and employees, as well as contractors and vendors working with GEHA. Among other things, you must use GEHA's resources appropriately to conduct legitimate GEHA business.
- 4.3 Outside Employment.** You are expected to devote your best efforts to the interests of GEHA. While you may engage in self-employment or outside employment that does not interfere with your work for GEHA, you are expected to fully disclose and obtain written permission from the appropriate Vice President or above and Compliance to engage in work that is in any way related to GEHA. This includes but is not limited to work with or for GEHA's competitors or business partners and work in an area similar to your role at GEHA whether self-employed or other outside employment.

4.4 Financial Interests and Transactions. You must not borrow money from, lend money to, invest in, or engage in any other personal, financial transaction with any current or potential member, contractor, vendor, or other person with whom GEHA has a current or potential business relationship. In addition, you must not represent GEHA in any transaction in which you or a member of your family has potential conflicts of interest (e.g., financial gain). GEHA does not do business with entities where a GEHA employee has a material ownership interest unless an exception is approved by the appropriate Senior Leadership, Vendor Management Office, and Compliance.

4.5 Gifts and Entertainment. Gifts and entertainment can be appropriate in building and maintaining business relationships. However, care must be taken because these activities can create the appearance of improper influence or conflicts of interest. Refer to the Gifts and Entertainment Corporate Policy for specific expectations [Gifts and Entertainment Policy](#).

4.6 Bribes and Kickbacks. Various laws (e.g., Federal Anti-Kickback Statute, State bribery statutes) prohibit offering or accepting anything of value to obtain or reward favorable treatment related to the purchase or sale of goods or services. Such activity could be construed as a kickback or bribe – which are not only unethical, but in many cases are illegal.

5 Set a Good Example. All executives, managers, and supervisors are expected to set a good example for all GEHA employees and business partners. This includes but is not limited to:

5.1 Modeling ethical behavior consistent with this Code.

5.2 Making sure your employees understand and comply with this Code, as well as the spirit and intent of the Code.

5.3 Speaking up immediately when any employee brings an ethical question or concern to your attention in full recognition there are no “off the record” or “off duty” communications.

6 Continuous Improvement. We will take affirmative steps to evaluate and reinforce our compliance efforts whenever deemed necessary, and at least annually, to ensure we remain a leader and model of business ethics and integrity. We may modify our compliance or ethics policies and procedures, our training efforts, and other policies, procedures, and guidelines consistent with these efforts.

7 Related Policies and Procedures. We have developed a number of policies and procedures to help guide you through different aspects of your employment or business relationship with GEHA. You may find these policies in our Employee Handbook, on MyGEHA, in various individual departments throughout our workplace, and public-facing policies on www.geha.com (e.g., Notice of Privacy Practices, Website Privacy Policy). You are expected to comply with our policies and procedures, including any related reporting requirements.

DUTY TO SPEAK UP – REPORTING ETHICAL CONCERNS

GEHA takes great pride in its reputation for ethical conduct and recognizes that it only takes one misguided or inappropriate action to put that valuable reputation at risk. GEHA, accordingly, requires that all employees and business partners (including contractors, vendors, and providers) report any potential unethical, illegal, improper, or wrongful conduct or activity to GEHA.

8 Your Responsibility to Speak Up. You are responsible for reporting to GEHA all information regarding any alleged conduct or activity that may constitute a potential violation of law, regulation, contract, policy, or procedure.

You must speak up in good faith regardless of whether you personally experienced the alleged conduct or activity, or merely learned of it from another. Reports should be timely and thorough, but may take a number of forms, including verbal, written, or electronic, and may even be phrased as a question.

9 Process for Speaking Up.

Corporate Compliance Officer and GEHA Ethics Hotline. You must report any alleged conduct or activity that may constitute a violation of law, regulation, policy, or procedure to GEHA's Compliance Officer (ComplianceOfficer@geha.com) or through the GEHA Ethics Hotline.

GEHA Ethics Hotline

Reports may be made by calling **800-356-5803**.

*****Anonymous reports are allowed*****

Reports submitted anonymously are, and will remain, anonymous. The identity of anyone who openly submits a report will be protected to the greatest extent possible consistent with the needs of the review, investigation, and remediation.

NOTE: If a report is made to management (i.e., supervisors and above), the recipient of the report is expected to immediately communicate with, or forward the report to, the GEHA Compliance Officer at ComplianceOfficer@geha.com so that Compliance may document the report and ensure its appropriate review, investigation, and resolution.

10 Handling Reported Concerns.

- 10.1** GEHA will promptly review, investigate, or otherwise handle all reports.
- 10.2** All employees are required to provide documents, participate in interviews openly and honestly, and otherwise cooperate with GEHA's efforts to review reports, investigate reports, and otherwise handle or correct issues raised in reports.
- 10.3** GEHA will:
 - a. Handle all reports as discretely as possible, including discussing the report or related facts on a "need to know" basis, consistent with GEHA's duty to review, investigate, or otherwise handle the report.
 - b. Protect the identity of the reporting employee, contractor, or vendor consistent with GEHA's duty to review, investigate, or otherwise handle the report.
- 10.4** GEHA will take corrective action to the extent GEHA deems appropriate based on GEHA's review, investigation, or other handling of the report. Corrective actions include, but are not limited to, any one or more of the following:
 - a. Disciplinary action, up to and including termination of employment;
 - b. Modification or termination of a business partner relationship (including work with contractors or vendors);
 - c. Requiring participation in training classes, whether individually or as a group;
 - d. Taking steps to recoup any monetary losses; and
 - e. Reporting information to a government agency or the authorities.

11 Retaliation Strictly Prohibited.

- 11.1 Protection from Retaliation.** You are protected against retaliation for acting in good faith consistent with the requirements of this policy, including but not limited to, making a report; participating as a witness, or otherwise, in the review, investigation, or handling of a report; making or filing a complaint with a federal, state, or local government agency; refusing to carry out a directive which would result in the violation of a law or regulation; or engaging in any other activity protected by law.
 - a. All forms of retaliation are prohibited, including but not limited to termination of employment, demotion, harassment, and other adverse employment actions.
 - b. "Good faith" means you reasonably believed the report, complaint, or information you provided was accurate and complete to the best of your knowledge, and any action you took or refused to take was based on a reasonable belief a violation of law would otherwise result.
 - i. You may be acting in good faith even if you make a mistake or your report is not substantiated.
 - ii. Good faith reports, information, and acts are not knowingly false or misleading or intended to improperly harm or gain an advantage over GEHA or another employee, contractor, or vendor.

- c. Corrective action based on your improper conduct (or participation in improper activity) is not retaliation, regardless of who reports the conduct or how it is reported.
- d. GEHA is committed to complying with all laws to ensure you are protected against retaliation for acting in accordance with this policy.

11.2 Your Responsibility to Report Retaliation. You are responsible for reporting to GEHA all information regarding any alleged conduct or activity that may constitute retaliation, consistent with the process set forth in Section 9 (“Process for Speaking Up”) of this policy. Potential retaliation must be reported regardless of whether the alleged conduct or acts were personally experienced or observed, and regardless of whether the alleged acts were directed at you or another person.

11.3 Investigating Potential Retaliation. GEHA will promptly review, investigate, or otherwise handle all reports of retaliation, and take appropriate corrective action (including termination of the employment of anyone found to have engaged in retaliation), consistent with the policies and procedures set forth in Section 10 (“Handling Reported Concerns”) of this policy.

12 Immunity from Liability for Disclosure of GEHA’s Trade Secrets.

12.1 No one shall be held criminally or civilly liable under any federal or state trade secret law for the disclosure of any of GEHA’s trade secrets, provided:

- a. The disclosure is made in confidence to a federal, state, or local government official, either directly or indirectly, or to an attorney, and is made solely for the purpose of reporting or investigating a suspected violation of law; or
- b. The disclosure is made in a complaint or other document filed under seal in a lawsuit or other proceeding.

12.2 Anyone who files a lawsuit for retaliation by GEHA for reporting a suspected violation of law may disclose GEHA’s trade secrets to an attorney, and use the trade secret information in a court proceeding, provided:

- a. Any document containing the trade secret is filed under seal; and
- b. The trade secret is not disclosed except pursuant to a court order.

POLICY METADATA

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Business Owner	Director of Compliance
Approval Authority	Chief Legal Officer

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