



CORE VALUES
— AND —
CODE OF CONDUCT



CORE VALUES AND CODE OF CONDUCT

Colorado Access, its subsidiaries and affiliated entities, are dedicated to providing access to high quality healthcare services to members while conducting business in an ethical manner. We must act with honesty, respect and integrity in all aspects of our operations.

Colorado Access operates by a set of core values and the Code of Conduct reflects those values.

This Code of Conduct (“Code of Conduct” or “Code”) is the foundation of the Colorado Access compliance program. Compliance means doing what we must do to meet

the requirements that govern our business, including laws, rules, regulations, contract requirements and internal policies and procedures. Ethics means doing what we should do in our actions with others, with respect to what is right and wrong.

It is the responsibility of every individual who provides services to Colorado Access to adhere to the Code of Conduct and Colorado Access compliance program. Our collective dedication to upholding the Code of Conduct will keep us on the path to future success in a manner that is aligned with our core values.

OUR CORE VALUES ARE:

- ▶ **COMPASSION**
- ▶ **TRUST**
- ▶ **EXCELLENCE**
- ▶ **COLLABORATION**
- ▶ **INNOVATION**

PURPOSE AND OVERVIEW

Each of us has an obligation to act honestly and ethically. The Code of Conduct serves as a guideline to help us understand how to do the right thing while achieving our mission, strategies and goals. The Code describes the behaviors we demonstrate while conducting business and is an integral part of our compliance plan and culture.

Our Code provides the framework to put our company's values into action. For purposes of this code, "Colorado Access," the "Company," "we," "us," or "our," refer collectively to Colorado Access, its subsidiaries and affiliated entities' employees and boards of directors, and anyone acting on behalf of Colorado Access. "You" refers collectively to workforce members of Colorado Access subsidiaries and affiliated entities.

Colorado Access has developed an enterprise-wide compliance program to foster an environment that promotes the prevention, detection, investigation and resolution of misconduct. We have an obligation to respect and meet the needs of our key stakeholders including government agencies, members and families, our

local communities and each other. We must demonstrate honesty, integrity, fairness, respect, confidentiality, safety and quality in the way we do business.

The Code applies to all members of the Colorado Access workforce. It supplements, and does not take the place of, Colorado Access policies and procedures

or the employee handbooks. Adherence to the Code of Conduct is a condition of employment and is a component of job and/or contractual performance evaluation. Any questions about the Code should be directed to your supervisor, a member of the compliance team or the chief compliance officer.





THE STANDARDS

ABIDING BY THE LAW

We will be familiar with the applicable laws, rules and regulations governing our work and we will conduct business accordingly. Colorado Access will not tolerate the violation of laws, rules and regulations, whether willful or not, that apply to our business operations.

Colorado Access will cooperate with government officials conducting unannounced visits or investigations. We maintain all documentation in anticipation of, or related to, a request for the information. We will treat all government auditors, investigators and other government representatives with respect and courtesy and respond truthfully. We have a written policy and procedure on how to respond to government visits, audits and investigations.

DOCUMENTATION AND RECORD KEEPING

Colorado Access will maintain accurate and complete information and do so in a timely manner. Our documentation related to our business, including member records, employee records and financial records, will be accurate and maintained in accordance with applicable rules and regulations. We will not knowingly process or approve a false, fraudulent or fictitious claim for payment.

Any reports or claims we submit will be accurate and truthful. We will promptly correct any identified deficiencies or errors in documentation.

CONFIDENTIALITY

Colorado Access will protect and properly use information whether related to members, employees, providers or Colorado Access business dealings. We will use information only for its intended purposes; confidential and proprietary information will be accessed and used only as needed to perform specific job responsibilities. Confidential or proprietary information will not be disclosed without proper authorization. Confidential and proprietary information includes, but is not limited to:

- Data
- Documents
- Contracts
- Medical Records
- Member Files
- Claims
- Email
- Requests for Proposals and Responses (RFPs)
- Methods of Operation
- Business Practices
- Policies and Procedures
- Strategic Plans and Planning Documents
- Board of Directors Documents
- Information Systems
- Financial Data/Reports
- HR/Employment Records

All Colorado Access workforce members are required to sign a confidentiality agreement upon hire and periodically thereafter. Workforce members will seek guidance as needed from the compliance and legal department.



COLORADO ACCESS OPERATES

BY A SET OF CORE VALUES AND

THE CODE OF CONDUCT REFLECTS THOSE VALUES

AVOIDING CONFLICTS OF INTEREST

A conflict of interest arises when you, or a member of your immediate family, have a financial or other interest that might influence your judgment or actions on behalf of Colorado Access. The appearance of a conflict of interest may be just as harmful as an actual conflict. We will avoid situations or conduct that could influence (or appear to influence) objective decisions required in our job performance. We will also refrain from conduct that could raise questions as to the honesty and integrity of Colorado Access or otherwise negatively impact its reputation. Workforce members will disclose any actual or potential conflicts of interest such as outside employment, advisory board and board of director activities, ownership interests in any provider or business entity that we conduct business with and/or any other activity that may pose an actual or potential conflict of interest upon hire and as they arise.

GIVING AND RECEIVING BUSINESS COURTESIES

Colorado Access will conduct business ethically and in compliance with rules and regulations that govern how we deal with potential referral sources and partners. Colorado Access will not offer or receive any business courtesy (gift, meal or entertainment) in exchange for referrals. Colorado Access has policies and procedures that describe when and how workforce members may give or receive gifts, meals or entertainment from referral sources, business partners and other non-employees. Use good judgment and discretion to avoid even the appearance of impropriety or obligation in giving or receiving gifts and entertainment. You must never offer to give money directly or indirectly to influence, obtain or retain business. Such payments may be considered bribes or kickbacks that violate company policies and laws.

COMPETING FAIRLY

We will compete fairly and ethically for all business opportunities. We will not make any agreement, arrangement or discussion with competitors concerning prices, terms and conditions of contracts that could be interpreted as price fixing or anti-competitive behavior.

We will not engage in any formal or informal agreement with a competitor to refrain from doing business with a particular customer, provider or in a geographic region. We will not use competitor information that is deemed confidential or proprietary to seek unfair advantage in the marketplace.

UPHOLDING THE CODE OF CONDUCT

WILL KEEP US ON THE PATH

TO FUTURE SUCCESS

You should be certain that any gift given or received, or entertainment hosted or attended does not violate the law, customary business practices or the Code. We will not accept cash or cash equivalents (such as gift cards) under any circumstances. This standard does not apply to gifts given between Colorado Access employees for non-work related purposes and does not apply to any gift, incentive or bonus given to employees by the company.

POLITICAL ACTIVITY AND CONTRIBUTIONS

Colorado Access encourages employees to participate fully and actively in the political process. It is important, however, that employees separate personal political activities from Colorado Access business activities. We will not use Colorado Access resources, including email, to solicit personal support or express personal political views and will not use the Colorado Access name in political advertisements or fundraising materials.

We will not use corporate funds to support any individual candidate or political party. Individual contributions by employees will not be reimbursed by Colorado Access, either directly or indirectly. We will comply with government laws, rules and regulations regarding corporate lobbying activities.

HOW WE TREAT OTHERS

We are committed to providing a positive, safe and cooperative work environment in which all workforce members are treated in a fair and equitable manner. We will serve

our customers in a professional manner with integrity and respect and will identify and meet standards for ensuring quality of care, accessibility to quality providers, and availability of services to our members.

We will apply the Colorado Access Code of Conduct and internal policies and procedures equally to all Colorado Access workforce members regardless of position in the workplace. We will take all reasonable precautions and follow applicable safety rules and regulations to maintain a safe environment for our members/consumers/families and visitors, as well as members of the Colorado Access workforce.

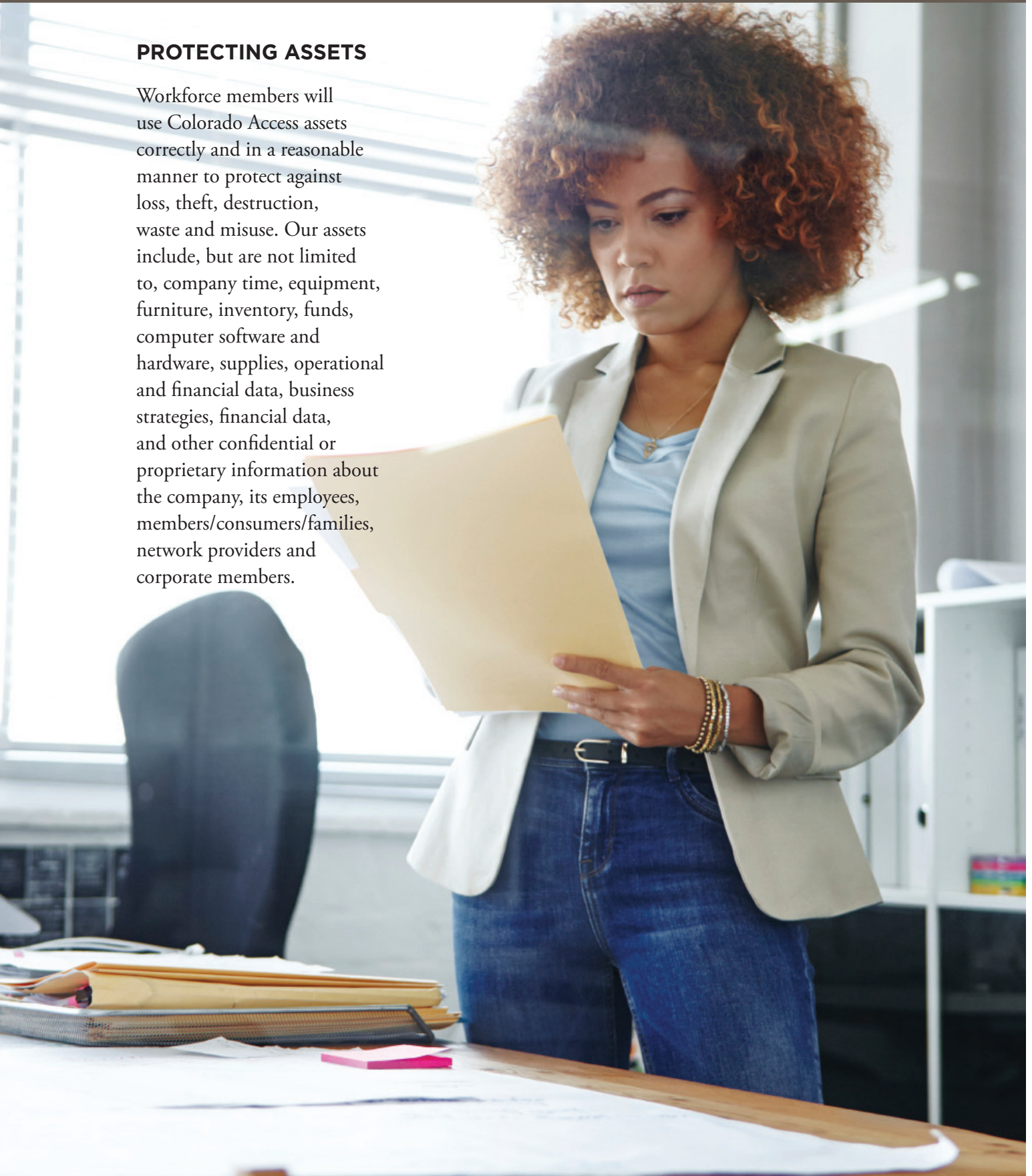
We will foster a work environment based on mutual respect, honesty and integrity, and recognition of cultural diversity:

- ▶ We will show respect and consideration for one another
- ▶ We will not tolerate any form of violence, threats, abuse, harassment or discrimination
- ▶ We will foster a work environment free of solicitation from employees



PROTECTING ASSETS

Workforce members will use Colorado Access assets correctly and in a reasonable manner to protect against loss, theft, destruction, waste and misuse. Our assets include, but are not limited to, company time, equipment, furniture, inventory, funds, computer software and hardware, supplies, operational and financial data, business strategies, financial data, and other confidential or proprietary information about the company, its employees, members/consumers/families, network providers and corporate members.





ASKING QUESTIONS AND SPEAKING UP

All levels of management will demonstrate and promote a commitment to ethical and legal behavior that is consistent with the Colorado Access Code of Conduct.

We need everyone's participation to address concerns; we are all required to report any questions or concerns. Promptly report any suspected or actual

violation of laws, rules and regulations to a supervisor, the chief compliance officer, a member of the compliance team, or the **Compliance Hotline at 877-363-3065**.

We will review and investigate all reports and questions in a confidential and impartial manner. There is a non-retaliation policy protecting individuals who make such reports. The chief compliance officer will investigate complaints about retaliation.

If you think
it may be wrong...
don't do it!

If you're not sure
what to do...
ask!



ADDITIONAL GUIDANCE AND RESOURCES

The Code of Conduct describes the behaviors we expect while policies and procedures provide specifics about what to do in the various situations faced by workforce members. Refer to the specific policies and procedures for detailed information and if you need additional guidance or your question isn't covered by a policy and procedure or department manual, speak with your supervisor or a

member of the compliance team. If there ever appears to be a conflict between the Code of Conduct and other Colorado Access documents, ask your supervisor or a member of the compliance team for clarification. The Code of Conduct, employee handbooks and internal policies and procedures are available via the company intranet, or through a member of the compliance team.