



Our Commitment

GlobalHealth is committed to doing business in an honest and ethical manner, and in compliance with applicable Federal and State laws, regulations, policies, and contractual requirements. In support of our compliance commitment, GlobalHealth has established a Code of Conduct. The Code of Conduct communicates the basic principles and standards of behavior expected in our work environment and the responsibility we all share for helping GlobalHealth remain in compliance.

This Code of Conduct has been approved by senior management and our governing board and is designed to promote honest, ethical, and lawful conduct by all employees, officers, directors, agents, and first tier, downstream, and related entities (“FDRs”). Your actions have an effect on our reputation and integrity. That is why it is important for you to read this Code of Conduct carefully so that you can understand and abide by its content.

→ All GlobalHealth employees, officers, directors, agents, and FDRs are required to read the Code of Conduct and sign a Compliance Certification form.

Reference policy #GH-CO-002.

Compliance Program

GlobalHealth maintains a comprehensive, effective Compliance Program to ensure compliance with applicable Federal and State laws and regulations, including those pertaining to Federal Health Care Programs (e.g., Medicare, Medicaid, Federal Employees Health Benefits Program (FEHBP), etc.). Our Compliance Program includes, at a minimum, the required elements in the Office of the Inspector General (“OIG”) model compliance program guidance, U.S. Federal Sentencing Guidelines, and compliance program requirements from The Centers for Medicare and Medicaid Services (“CMS”). This includes: (1) designated Chief Compliance Officer; (2) Code of Conduct; (3) written policies and procedures; (4) auditing and monitoring; (5) education and training; (6) methods for reporting compliance concerns, including a toll-free anonymous hotline; (7) periodic risk assessments; and (8) disciplinary, corrective, and/or remedial action when compliance concerns are identified.

→ All GlobalHealth employees, officers, directors, agents, and FDRs must complete appropriate compliance training upon employment, contract execution, or appointment, and annually thereafter.

Reference policy #GH-CO-001. Also see 42 CFR §§422.503(b)(4)(vi) and 423.504(b)(4)(vi); CMS Publication #100-16, Chapter 21; and CMS Publication #100-18, Chapter 9.

Reporting Compliance Violations

GlobalHealth employees, agents, officers, directors, and FDRs have an obligation to report compliance violations or concerns, including violations of GlobalHealth policy or the Code of Conduct. Reports may be made directly to the Chief Compliance Officer (“CCO”) or Compliance Department or through a 24-hour toll-free anonymous reporting hotline. All reports concerning a potential compliance violation are investigated by the CCO and held in the strictest confidence possible depending on the nature of the report.

GlobalHealth has a strict non-retaliation policy. Anyone who in good faith reports a violation, or assists in an investigation of a possible violation, will not be intimidated or retaliated against.

→ Methods for contacting Compliance

CCO Direct Phone:	(405) 280-5711
Toll-free:	1-877-280-5852 (anonymous 24-hour hotline)
Email:	compliance@globalhealth.com
FAX:	(405) 280-5894
Address:	ATTN: Compliance Officer GlobalHealth, Inc. 701 NE 10 th ST Suite 300 Oklahoma City, OK 73104-5403

Reference policy #GH-CO-003.

Fraud, Waste & Abuse (“FWA”) Program

An important part of the Compliance Program is to ensure adequate methods for prevention, detection, and deterrence of Fraud, Waste, and Abuse (FWA).

Fraud is knowingly and willfully executing, or attempting to execute, a scheme or artifice to defraud any health care benefit program (such as Medicare) or to obtain by means of false or fraudulent pretenses, representations, or promises, a payment or benefit from the health care benefit program.

Waste is the overutilization of services, misuse of resources, or other practices that directly or indirectly result in unnecessary costs to the Medicare Program.

Abuse includes actions that may, directly or indirectly, result in unnecessary costs to the Medicare Program, improper payments, payment for services that fail to meet professionally recognized standards of care, or services that are medically unnecessary.

Examples of FWA include (but are not limited to):

1. Falsifying documents or submitting fraudulent documentation/reports to the government in order to obtain financial or other benefit.
2. Upcoding or billing for items/services that are not documented in the medical record or were not provided.
3. Forged prescriptions.
4. Member sharing their ID card with someone else.
5. Routine ordering of medically unnecessary services.
6. Duplicate charging / billing.
7. Receiving an overpayment from Medicare and keeping it.

GlobalHealth employees, agents, officers, directors, and FDRs are expected to participate in the prevention, detection and reporting of FWA. This includes participation in required FWA training. Do not worry about deciding whether something is fraud, waste, or abuse. If you have reason to suspect possible FWA, you have a duty to notify the CCO or FWA manager.

Reference policy #GH-CO-013.

The Federal False Claims Act

The Federal False Claims Act (“FCA”), 31 U.S.C. §§3729-3733 and 3801-3812, and similar state laws, prohibit the knowing presentation of false or fraudulent claims to the Federal or State governments. Fraudulent and abusive activities may include knowingly (1) billing for services not provided; (2) including incorrect codes or charges on bills to receive higher reimbursement; (3) forging, altering or destroying documents to secure payment; or (4) making or using, or causing to be made or used, a false record or statement in order to receive payment or benefit.

No intent to defraud is required under the FCA. A person or entity acts “knowingly” if he/she/it has actual knowledge that the act is fraudulent, or acts in deliberate ignorance or reckless disregard of the truth. In other words, the standard is, “knew or should have known.” Examples: (1) you suspect that a coworker is committing fraud but you choose to ignore it; (2) you do something that you believe may be incorrect based on guidance or policy; and (3) you are not sure whether it is correct, and you fail to review the policy or procedure or ask for guidance.

Violations of the FCA include fines of up to three (3) times the dollar amount claimed (referred to as “treble damages”) and civil monetary penalties (“CMP”) from \$5,500 to \$21,000 for each false claim. A violation of the FCA may also result in forfeiture of participation in Federal health care programs (i.e., no longer being able to participate in the Medicare Program).

Individuals who believe that Federal health care program billing requirements have been violated may pursue alternative administrative or legal remedies under the FCA or State law and cannot be retaliated against for reporting such a violation. Individuals with knowledge of false claim billing may also file a lawsuit on behalf of the United States government and receive a percentage of any recoveries.

→ If you believe there is a potential FCA situation, report it to Compliance.

Anti-Kickback Statute

The Anti-Kickback Statute (“AKS”), 42 U.S.C. §1320a-7b(b), provides penalties against anyone who knowingly and willfully solicits, receives, offers, or pays remuneration, in cash or in kind, to induce or in return for (1) referring an individual to a person or an entity for the furnishing or arranging for the furnishing, of any item or service payable under the Federal health care programs or (2) purchasing, leasing, ordering, or arranging for or recommending the purchasing, leasing, or ordering of goods, facilities, services, or item payable under the Federal health care programs.

Individuals and entities that engage in unlawful referral or kickback schemes may be subject to criminal penalties, civil monetary penalties, or exclusion from participation in Federal health care programs.

→ GlobalHealth is committed to compliance with the AKS. Anyone who is aware of a potential AKS violation should report it to the CCO.

Reference policy #GH-CO-008.

Conflicts of Interest

A conflict of interest occurs when a relationship or private interest influences or impairs, or may give the appearance of impairing, your ability to make objective and fair decisions in the performance of your job or is contrary to GlobalHealth’s business interests. Employees, and those acting on behalf of GlobalHealth, should avoid situations that might force choosing between personal interests and the interests of GlobalHealth.

It is not possible to describe or anticipate all circumstances and situations that involve a conflict of interest, but below are a few examples that might be a potential conflict.

- Direct or indirect financial interest in, or in a financial, consulting, managerial or employment relationship with, a company that is a competitor, customer, or a supplier of goods and services to GlobalHealth.
- Solicitation or acceptance, directly or indirectly, of gifts, payments, or other benefits from customers, suppliers, or those doing business or seeking to do business with GlobalHealth.
- Receiving personal honoraria for services performed that are closely related to the individual’s job duties with GlobalHealth.
- Employment in a second job or having a relationship with a competitor or other entity where the nature of that job or relationship places the individual in a conflict with GlobalHealth’s interests.
- Using information, property, or one’s position with GlobalHealth for personal gain.
- Acquiring, directly or indirectly, real property, leaseholds, or other property or rights in which GlobalHealth has, or the individual has reason to believe at the time of acquisition, that GlobalHealth is likely to have an interest.
- Serving on a board of directors or similar body of a for-profit company or government agency.

You are free to engage in outside activities that do not interfere with the performance of your responsibilities to GlobalHealth or that are in conflict with GlobalHealth interests. Although GlobalHealth encourages professional

activities and community involvement, care should be taken not to compromise duties owed to GlobalHealth.

→ If you have questions concerning a possible conflict or are aware of a conflict of interest situation involving yourself or someone else, report this to the Compliance Officer.

Reference policy #GH-CO-016.

Use of Company Assets and Property

Assets or property belonging to GlobalHealth may only be used for legitimate, authorized business purposes. You may not (1) take, use, or knowingly misappropriate Company assets or property for personal use or gain, or for use by another, or for an improper, unethical, or illegal purpose; (2) remove, dispose of, or destroy anything of value belonging to GlobalHealth without GlobalHealth's consent; (3) take for yourself personally any opportunities discovered through the use of GlobalHealth's property, information, or position. Additionally, you should not engage in the unauthorized use, copying, distribution, or alteration of computer software.

Competition and Antitrust

GlobalHealth complies with applicable antitrust and similar laws that regulate competition. Examples of conduct prohibited by antitrust laws include: (1) agreements to fix prices; (2) bid rigging; (3) collusion with competitors; (4) boycotts; (5) certain exclusive dealing; (6) price discrimination agreements; (7) unfair trade practices including bribery, misappropriation of trade secrets, deception, intimidation, and (8) similar unfair practices. These behaviors and situations must be avoided.

Privacy and Security of Information

GlobalHealth complies with Federal and State laws and regulations concerning the privacy and security of Protected Health Information ("PHI"), including the Health Insurance Portability and Accountability Act of 1996 ("HIPAA") and the Health Information Technology for Economic and Clinical Health ("HITECH") Act. Member/Patient health information is confidential and should not be released without proper authorization.

PHI includes any information that can identify an individual (e.g., name, address, phone, account number, email address, date of birth, SSN, etc.) and has to do with the individual's past, present, or future health status. GlobalHealth must take reasonable precautions to safeguard PHI. This includes, but is not limited to, the following:

- (1) Read and follow GlobalHealth policies pertaining to privacy and security of PHI including the Notice of Privacy Practices ("NPP").
- (2) Do not discuss PHI with affiliates or coworkers unless necessary for business purposes.
- (3) Do not discuss PHI with your family and friends or other outside party. Do not post confidential company information or PHI on social media.
- (4) Shred all documents containing PHI. Do not put confidential information in a regular trash can – only use bins that are labeled as confidential shred bins.
- (5) Log off computer screens when not in use.

- (6) Always use an approved, completed FAX cover sheet when faxing confidential information.
- (7) Do not email PHI without proper authorization. If you are sending a confidential email, make sure it is properly encrypted and includes an approved privacy disclaimer.
- (8) Change your computer password often. Do not share your password or post it where others can see. Make sure your password is secure: an ideal password contains at least eight (8) characters with a combination of numbers, alpha, symbols, and upper and lower cases, and is not a word found in the dictionary.
- (9) Ensure that any electronic devices used outside our facilities, whether company owned or personally owned, have the proper safeguards including encryption. This includes laptops, tablets, USB (thumb/flash) drives and cellphones/smartphones.

→ If you have any question concerning a privacy or confidentiality matter or believe a HIPAA privacy violation may have occurred, contact the GlobalHealth Privacy and Information Security Officer as soon as possible at (405) 280-5524 or email privacy@globalhealth.com. Or, call the toll-free hotline at 1-877-280-5852 and leave a message.

Reference policies #GH-HI-001 – 010.

Network / Computer Use

Any individual who accesses or uses the GlobalHealth computer network system must follow system use agreement requirements and policies. This includes safeguarding electronic information and mobile devices and taking all reasonable precautions to protect confidential information stored on computers. PHI must be secured in accordance with requirements established by HIPAA, HITECH, and other applicable federal and state regulations. Breaches of unsecured PHI may result in serious fines and penalties. Additionally, there are notification requirements for breaches of unsecured PHI, including reporting such breaches to the affected parties, the government, and the media.

→ If you are aware of an improper disclosure or breach of PHI, or if you have lost or misplaced a mobile device containing PHI, notify the GlobalHealth Privacy and Information Security Officer (call 405-280-5524 or email privacy@globalhealth.com) and the Help Desk (helpdesk@globalhealth.com) immediately.

Reference policies #GH-HI-001 – 010.

Sales and Marketing

GlobalHealth's marketing and advertising must be truthful and not misleading. Claims about GlobalHealth products or services must be supported by evidence to substantiate the claim. Further, GlobalHealth must comply with specific marketing rules that pertain to Medicare Advantage plans. Anyone responsible for sales or marketing of Medicare products must complete approved specialized training, testing, and compliance attestation each year.

→ If you are aware of questionable sales or marketing practices, notify the Compliance department.

Reference policy #GH-CO-006. Also see CMS Publication #100-16 – Medicare Managed Care Manual, Chapter 3.

Workplace Behavior

General

GlobalHealth is committed to a work environment that respects the rights, dignity, and cultural differences of its work force. GlobalHealth expects that all employees and associates will conduct themselves in a professional manner both in the work place and at any time or location while representing GlobalHealth. Employees should refer to the Human Resources (HR) Tab on the GlobalHealth intranet site for updated HR policies.

Harassment

GlobalHealth does not tolerate harassment in the work place. Harassment occurs when one's conduct creates an intimidating, offensive, or hostile environment that interferes with work performance. Harassment may include, but is not limited to, the following: inappropriate verbal conduct, such as racial epithets or sexual innuendos; display of inappropriate materials; use of inappropriate gestures; transmitting sexually suggestive, derogatory, or offensive materials via GlobalHealth computers or accessing such information while at work; assault; unwanted physical contact, coerced sexual conduct, touching, patting, or pinching; and threats or demands to submit to sexual requests. Harassment, or any other form of physical, mental, or verbal abuse or disruptive behavior, is inappropriate and will not be tolerated. Anyone who believes he or she has been unlawfully harassed should promptly report this to his or her supervisor, HR director or the Compliance Officer.

Reference policy #GH-HR-205.

Weapons

Weapons are prohibited in the GlobalHealth workplace, whether legally permitted or not.

Drugs/Alcohol

GlobalHealth is committed to providing a drug-free work environment. All job applicants must pass a drug screening test prior to employment. The illegal possession, distribution, or use of any controlled substances on company premises or at company functions is strictly prohibited. Reporting to work under the influence of any illegal drug or alcohol is also prohibited. Employees may be asked to undergo drug testing in certain situations as defined by written policy and State law.

Reference policy #GH-HR-309.

Smoking/Tobacco

GlobalHealth maintains a tobacco-free, smoke-free environment; this includes a restriction on the use of electronic cigarettes (e.g., vaping) on any GlobalHealth leased or owned property.

Reference policy #GH-HR-307.

Work Attire

Employees and agents are expected to display a professional appearance at work and while representing GlobalHealth. This includes maintaining proper grooming and business attire.

Reference policy #GH-HR-308.

Solicitation

To promote an atmosphere conducive to productivity and free of undue pressure, GlobalHealth does not permit anyone to sell or solicit other employees to purchase goods or contribute money to non-Company approved fundraisers in work areas or during work time.

Travel Safety

Everyone is expected to obey all traffic laws when operating a vehicle for company business purposes. This includes not texting or emailing when driving.

Accounting and Recordkeeping

All GlobalHealth records must be prepared accurately, reliably, honestly, and in accordance with established finance/accounting or other written procedures. Entries of cost, financial or other business information are made only to the regularly maintained books and records. GlobalHealth has a system of administrative and accounting controls to (1) safeguard its assets; (2) check the accuracy and reliability of its accounting data; (3) promote operational efficiency; and (4) comply with laws and regulations.

All records must be stored in a secure location for the period of time required by law or by policy, whichever is longer – typically ten (10) years. Records should be organized in a manner that permits prompt retrieval. Records that are no longer needed, either in paper or electronic form, must be properly disposed of, or purged, in accordance with applicable record retention policies. A record should never be destroyed in anticipation of, or in response to, a request for those documents by any government agency, court, or litigation hold.

→ Know and follow the record retention policies that apply to your area. If you are not sure, ask your supervisor or contact the Compliance Department.

Reference policy #GH-CO-011.

Hiring or Contracting with Ineligible or Excluded Individuals or Entities

GlobalHealth will not credential, hire or contract with individuals or entities that: (1) have been excluded within the last five years from any Federal health care program (e.g., Medicare, Medicaid, CHAMPUS); (2) are owned or controlled by individuals who have been convicted, sanctioned, and/or excluded from a Federal program; (3) have been convicted of a criminal offense that would trigger exclusion from a Federal program; or (4) are proposed for sanction by a program. All individuals employed by or contracted with GlobalHealth must notify GlobalHealth of the occurrence of any of the above listed actions.

GlobalHealth conducts pre-employment screening of all new employees against the Office of the Inspector General (“OIG”) list of excluded individuals and entities at <http://exclusions.oig.hhs.gov> and <https://www.sam.gov>. Such screenings are also conducted on network providers, contractors, and vendors. Follow-up screening is performed monthly. Non-contracted providers are screened prior to any claims payment. FDRs are expected to screen their employees, contractors and subcontractors in accordance with GlobalHealth policy.

Reference policy #GH-CO-004.

Claims Processing and Determinations

GlobalHealth complies with applicable Federal and State laws and regulations pertaining to payment of claims for services, including those from The Centers for Medicare & Medicaid Services (“CMS”), as applicable. GlobalHealth takes reasonable measures to ensure that claim determinations are made accurately and timely. Individuals who work in claims areas are expected to understand and comply with applicable Federal health care program requirements, contractual agreements, and GlobalHealth policies related to claims adjudication and payment.

Standard clinical admissions criteria that include medical necessity guidelines are used to determine whether or not reimbursement may be made for inpatient care. Authorization determinations are made based on established criteria and are made without discrimination, prejudice, or bias.

→ Seek guidance from management if a policy is unclear or a unique situation arises where you are uncertain how to proceed.

Reference policy #GH-CO-007.

Interactions with Regulatory Agencies and Government Officials

GlobalHealth is honest in its dealings with regulatory agencies and government officials, and complies with applicable reporting and disclosure requirements. GlobalHealth employees, directors, officers, affiliates, representatives, agents, and FDRs must not attempt to influence, bribe, or have dealings with government officials that are, or would give the appearance of being, illegal or unethical.

→ Consult the CCO for any questions concerning communication with or reporting to a regulatory agency or government official.

Reference policy #GH-CO-018.

Non-Discrimination and Affirmative Action

GlobalHealth complies with federal and state employment laws and does not discriminate in its hiring practices with regard to age, race, color, gender, religion, national origin, ethnicity, disability, gender identity, gender assignment, sexual orientation, or veteran status. GlobalHealth is an Equal Opportunity Employer and affirmatively seeks to recruit, employ, and advance qualified protected veterans and qualified individuals with disabilities.

→ If you are a supervisor, or in a position to make hiring decisions, make sure you understand GlobalHealth’s employment-related policies and relevant laws. If you don’t know, contact the CCO or HR.

Reference policy #GH-CO-019.

Disciplinary Action

One of the elements of an effective compliance program is consistent enforcement of compliance through corrective, remedial, and/or disciplinary action. In accordance with our Compliance Program, GlobalHealth takes appropriate and timely corrective action when non-compliance situations are discovered.

Further, GlobalHealth has a written disciplinary action policy that provides guidance for consistent handling of employee matters (e.g., Code of Conduct violations, policy violations, and other non-compliance situations, misconduct, etc.).

Reference policy #GH-CO-012.

Policies

GlobalHealth employees, agents, directors, officers, and FDRs are expected to adhere to GlobalHealth's policies and are responsible for knowing where and how to access those policies. Policies are maintained on the GlobalHealth intranet site <http://polaris/sites/1greatteam/policies/default.aspx>. Compliance policies are available for outside entities (agents, FDRs, providers, etc.) through the internet applicable tab.

It is not possible to anticipate every decision or action that you might face or encounter. If you have any doubt about the right ethical or legal choice to make, review GlobalHealth policies for guidance, or seek direction from the responsible manager or the Compliance Department.

Below is a list of Compliance policies as of the print date of this Code of Conduct. Note: This list is not inclusive of all GlobalHealth policies. Please review policies periodically, at least annually.

Compliance Policies	Description
- GH-CO-001	Compliance Program
- GH-CO-002	Code of Conduct
- GH-CO-003	Reporting Compliance Concerns (including the toll-free hotline)
- GH-CO-004	OIG Exclusion Screening
- GH-CO-005	Non-Retaliation
- GH-CO-006	Medicare Marketing
- GH-CO-007	Claims Payment
- GH-CO-008	Anti-Kickback Statute
- GH-CO-009	Appeals & Grievances
- GH-CO-010	FDR Oversight
- GH-CO-011	Record Retention
- GH-CO-012	Disciplinary Action
- GH-CO-013	Fraud, Waste, and Abuse (FWA)
- GH-CO-014	Advance Directives
- GH-CO-015	Compliance Audit Plan
- GH-CO-016	Conflict of Interest
- GH-CO-017	Social Media Use
- GH-CO-018	Dealing with Regulatory Agency or Government Officials

- GH-CO-019 Non-Discrimination and Affirmative Action
- GH-CO-020 Contract Management
- GH-CO-021 Policy Approval Process

HIPAA Policies

Description

- GH-HI-001 Privacy Policy
- GH-HI-002 Breach Notification
- GH-HI-003 Release of PHI
- GH-HI-004 Email
- GH-HI-005 FAX
- GH-HI-006 Information Security
- GH-HI-007 Remote Access
- GH-HI-008 Mobile Computing Devices
- GH-HI-009 Amendment of PHI
- GH-HI-010 Destruction of Confidential Materials



Compliance Certification

I have read the GlobalHealth Code of Conduct and will abide by its contents.* I understand that it is my responsibility to bring known or potential violations of the Compliance Program, Code of Conduct, applicable laws or regulations, or GlobalHealth policy to the attention of the Compliance Department. I understand that I will not be retaliated against or punished for my good faith report or inquiry.

I know how and where to access GlobalHealth’s compliance polices and any other policies relevant to my job. I also understand that it is my responsibility to periodically review the GlobalHealth Code of Conduct and policies and to seek guidance from management or the GlobalHealth Chief Compliance Officer if I have any questions.

Print Name _____ Title _____

Signature _____ Date _____

Your Department or Company Name (if FDR): _____

*Please state below any known or potential conflict of interest or other situation that might prevent you from fully complying with the Code of Conduct, Compliance Program, or GlobalHealth policies.

Sign and return this form to Human Resources or your designated contact.