



Agent Code of Conduct

A commitment to honesty, integrity and respect

Our program's purpose:
At Blue Cross and Blue Shield of Minnesota, we are committed to the principles of integrity, honesty and respect in everything that we do. We want our activities to reflect positively on our government customers, the companies and individuals we serve and on Blue Cross. As an agent, you play a critical role. This brochure details some of our most important matters of compliance. "We," "our," or "us" refers to Blue Cross. "You" or "your" refers to you as the agent of Blue Cross.

Compliance with the law

Blue Cross and its agents are subject to a variety of legal requirements and compliance with the law is critical in all of our business activities. Failure to comply with the law can result in termination of your agent or agency relationship with us.

Blue Cross assets and information

Use of company funds and assets

Our assets may be used only for legitimate Blue Cross business purposes and only by authorized users. Our assets include much more than equipment, inventory, corporate funds or office supplies. Assets are also concepts, business strategies and plans, financial data, intellectual property rights for trademarks and patents, and other information about our business. All assets owned by us, including the services of attorneys, contractors, consultants or other employees, are solely intended for conducting our business and not for the personal gain of any individual.

Confidential information and proprietary information

We must maintain a strict standard of confidentiality to protect our confidential and proprietary information. Any unauthorized access, use or disclosure of this private company information is prohibited. Confidential information includes anything that is not generally known or shared with the public.

Examples include:

- Health and other sensitive information that we obtain through our business or employment relationships
- Proprietary information, often known as "trade secrets," which is helpful to our competitors and is generally not available to the public
- Information about our agents, customers, employees, consultants, temporary workers or participating providers that isn't public knowledge

You also have the duty to respect the confidentiality of others' information. We prohibit the acquisition of confidential or proprietary information (including technology) about other companies through improper means such as deceit, misrepresentation, or receipt of information from a third party or a present or former employee who is not authorized to disclose it. If you obtain such information improperly, it is not only unethical and wrong, it may also be illegal.

Member protected health information

We are obligated to ensure that our members' protected health information (PHI) is secure. Disclosing PHI to anyone other than the individual, without the individual's authorization, is strictly prohibited, unless otherwise allowed by the law.

PHI includes any information related to someone's past, present or future physical or mental condition or treatment, including payment of benefits for any treatment received by the individual. PHI also includes any demographic information which may be used to identify the member, including a member identification number.

Equally important in securing our members' PHI is to restrict access to and use of PHI only to when it is necessary to complete the job function. Any other use is strictly prohibited.

Data security and software license obligations

To ensure maximum protection of our company data, Blue Cross and its agents must strictly enforce data-security provisions. You must protect the integrity of company data by allowing only authorized users to access protected information. You must take every precaution to ensure that user IDs and passwords are not available to unauthorized users.

We use a wide variety of computer software that is protected by various licensing agreements and copyright laws. You cannot duplicate or use the computer software outside the bounds set by the vendor. The penalties for violating these licensing agreements are severe and may include personal liability.

Suppliers and customers

Business conduct

The superior value of the products and services we buy and sell is the basis for our business conduct. No payments or offerings of any kind, other than those included in our standard marketing policies, may be made to customers or prospective customers to gain their business. Further, any payment made to a third party for any purpose other than that disclosed on the payment documentation is prohibited.

Suitability

We are committed to offering only products that meet a prospect's need for coverage, provider network, and premium and cost-sharing. You have a special role and are obligated to ensure that your clients purchase the health plan product that best meets their needs. You fulfill this obligation by determining:

- If your clients' providers are in the Blue Cross network under consideration
- If that product covers services, such as maternity, that the client may need
- If the premium and out-of-pocket costs are consistent with the client's financial situation

Suitability is particularly important in sales of Medicare products, individual products, and all high-deductible health plan products.

You are responsible for being informed and knowledgeable about the products that you sell. We require all agents to participate in initial and ongoing Blue Cross product-specific training and appropriate sales technique training.

Advertising and promotions

We strive to ensure that our advertising is truthful and expect you to follow the same high standard. If you make specific claims about Blue Cross products or services, you should have a good-faith basis for those claims. Products or services should not be marketed in any way that might cause confusion between our products or services and those of our competitors. If you believe that a customer or potential customer may have misunderstood you, you must promptly correct any misunderstanding.

If you compare our products or services to those of our competitors, such comparisons must be fair and fact based.



Reporting violations

We are committed to providing steps to help agents report violations of law or the code of conduct. We strictly prohibit intimidation or retaliation of any kind against you for good faith reporting of violations of our policies, for participation in an investigation of alleged violations, or for filing charges external to Blue Cross.

We offer a number of resources and reporting options to you:

Direct contact with Judith Walker, chief compliance and ethics officer, at (651) 662-1946; or Karen Matz, assistant compliance and ethics officer, at (651) 662-6281 — these company officials are available to answer any questions you may have, investigate any potential concerns and address any confirmed compliance violations.

Compliance Hotline at 1-866-311-4229 (toll free) — This hotline connects you to an operator who is available to answer your call 24 hours a day, seven days a week. The source of the call remains confidential unless you choose to identify yourself.

Fraud Hotline at 1-800-382-2000, ext. 28363 — We have a comprehensive plan to detect, correct and prevent fraud, waste and abuse within our community. If you know of or suspect any type of insurance fraud, call the fraud hotline at (651) 662-8363 or 1-800-382-2000, ext. 28363, between 8 a.m. and 4:30 p.m. Monday through Friday. If you are calling after hours, please leave a voicemail message. Callers may identify themselves or remain anonymous.

Audit Hotline at 651-220-0016 — This is a separate hotline for concerns, questions and reports of potential accounting and audit violations. The hotline is monitored by the chair of our board of trustees Audit Committee.

Anonymous external mail —
You may send information to:
Chief Compliance and Ethics Officer
P.O. Box 50821
Mendota, MN 55150-0821